



**First Public Consultation**  
November 2020 - February 2021

Hydropower Sustainability Assessment Council

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# First Public Consultation Summary and Responses



## EXECUTIVE SUMMARY

This document provides a compendium of all material issues raised during the First Public Consultation on the Hydropower Sustainability Standard, gathered in the period between 12 November 2020 and 8 February 2021.

Respondents were asked to submit their comments electronically by completing an online response form. Respondents provided feedback on recommendations by answering a series of yes/no, multiple-choice and open-text questions. Responses to yes/no and multiple-choice were statistically analysed and are presented as percentages. Open-text comments were anonymised and presented by matter under consultation. Comments and responses to comments presented in this paper have been approved by the Working Group and are considered a matter of public record.

### Overview of respondents

In total, 43 responses were provided to the consultation paper. Respondents were from research and consultancy (including Accredited Assessors), industry (Hydro-Quebec, Landsvirkjun, Andritz, Brookfield Renewable), financial institutions (World Bank), academia (Papua New Guinea University of Technology), government (South Africa, India, Switzerland), NGO (WWF), and standards and certifications (LIHI). It should be noted that the response submitted by the WWF represents the outcome of an extensive internal consultation.

*Table 1 - Number of respondents by sector*

Main stakeholder groups	Number of respondents	Percentage
Research and consultancy	16	38%
Industry (manufacturers, owners and developers)	14	31%
Government	4	10%
Academia	3	7%
NGO	3	7%
Financial institutions	1	2%
Standards and certifications	1	2%
Unknown	1	2%
Total	43	100%

### Statistical summary of responses

A statistical summary of the feedback received on the matters for consultation is provided below. Generally, the feedback from the first consultation was very positive, with support for recommendations ranging from 69% to 95%. Open-text comments allowed respondents to provide additional feedback that is not captured in the statistical analysis but is summarised further in the comments and responses. In addition, the statistical analysis does not capture the wider consultation efforts conducted over the same period and the emphasis put on capturing and considering the strength and diversity of inputs. For example, WWF-Int responded on behalf of the whole organisation after an internal consultation and International Rivers responded outside the consultation process so their views were considered but not captured in the statistics.

## First Public Consultation Summary and Responses

*Table 2 - Statistical summary of responses*

#	Matter for consultation	Statistical summary
1	<b>Object of the Standard and Rating System</b>	69% support the recommended Option 3 (HESG good practice pass + ratings for higher performance) <ul style="list-style-type: none"> <li>• 7% support Option 1 (HSAP good practice pass)</li> <li>• 10% support Option 2 (HESG good practice pass)</li> <li>• 7% support Option 4 (HSAP good practice+ ratings for higher performance)</li> <li>• 5% support none of the proposed options</li> </ul>
2	<b>Certification Process</b>	83% support the recommended Option 1 (Assessment, Publication and Application) <ul style="list-style-type: none"> <li>• 17% support Option 2 (Pre-assessment Application, Assessment, Publication and Recommendation)</li> </ul>
3	<b>Sustainability in Progress Recognition</b>	75% support the recommendation
4	<b>Duration of the Sustainability Rating</b>	80% support the recommendation
5	<b>Rating Renewal and Update Processes</b>	88% support the recommendation
6	<b>Changes to the Standard</b>	93% support the recommendation
7	<b>Appeals Process</b>	85% support the recommendation
8	<b>Governance</b>	95% support the recommendation
9	<b>Communications and Transparency Processes</b>	88% support the recommendation
10	<b>Quality of Consultation Paper</b>	77% agreed the paper covered all main topics, 80% agreed that the provided recommendations were relevant and suitable, 93% agreed that provided information was fair and unbiased.

### Summary of additional open-text comments

Respondents had the option to provide open-text comments on the recommendations and suggest alternative methods or approaches. Some of the comments included:

- There is a need to define the Standard's theory of change (i.e. how will the standard help to achieve sustainability? What is going to incentivise dam developers and operators to certify their plans beyond rewarding the virtuous ones? Is the standard aimed at supporting green electricity markets? What is the business case for plants to get certified?).

## First Public Consultation Summary and Responses

- There are issues around credibility as IHA is seen as the spokesperson of the industry (i.e. the governing board of the standard must be seen as fully independent from IHA).
- There are concerns around establishing an acceptable minimum threshold while also incentivising continuous improvement (i.e. too low a threshold could be viewed as greenwashing).
- There is a need to be cautious about the “Sustainability in Progress” recognition, given the perception of greenwashing.
- How projects will be monitored during the rating period should be established.
- Clear communications are key to avoid misconceptions about the legitimacy and quality of the existing tools, assessment process and topic-specific requirements, and clarify the theory of change of the Standard.
- The “PLUS” methodology of the recommended option still needs to be developed which adds a level of uncertainty.

Comments on the consultation matters, as well as other material issues raised, are summarised in the synopsis below.

Building on the feedback received, the Working Group has finalised the design proposal of the Standard and provided recommendations to the Hydropower Sustainability Governance Committee.

## COMMENTS AND RESPONSES

This section illustrates the options and recommendations, anonymises and summarises the open-text comments received, and provides a response to each material issue raised. If two or more comments express the same issue, the comments are regrouped and/or summarised, then responded to as a single issue. Comments and responses to comments presented in this paper have been approved by the Working Group and are considered a matter of public record.

### 1. Object of the Standard and the rating system

Summary of options	
<p><b>Option 1</b> <b>HSAP good practice pass</b></p>	<p><b>Object of the Standard:</b> HSAP (<u>good practice</u>).</p> <p><b>Rating system:</b> A pass at the level of good practice if all HSAP Level 3 scoring statements are met for all relevant topics.</p>
<p><b>Option 2</b> <b>HESG good practice pass</b></p>	<p><b>Object of the Standard:</b> HESG (<u>good practice</u>).</p> <p><b>Rating system:</b> A pass at the level of good practice if all HESG scoring statements are met for all relevant topics (noting that the HESG has fewer topics than the HSAP, prioritising Environmental, Social and Governance topics, and only sets out criteria at the level of good practice).</p>
<p><b>Option 3 (Recommended)</b> <b>HESG good practice pass plus ratings for higher performance (to be developed)</b></p>	<p><b>Object of the Standard:</b> HESG (<u>good and best practice</u>).</p> <p><b>Rating system:</b> A pass at the level of good practice if all HESG scoring statements are met for all relevant topics (noting that the HESG has fewer topics than the HSAP, prioritising Environmental, Social and Governance topics, and only sets out criteria at the level of good practice), PLUS a rating applied to performance levels above good practice which is to be developed by adding HSAP best practice scoring statements to the HESG.</p>
<p><b>Option 4</b> <b>HSAP good practice pass plus ratings for higher performance</b></p>	<p><b>Object of the Standard:</b> HSAP (<u>good and best practice</u>).</p> <p><b>Rating system:</b> A pass at the level of good practice if all HSAP Level 3 scoring statements are met for all relevant topics, PLUS a rating applied to performance levels above good practice.</p>

## First Public Consultation Summary and Responses

<p><b>Option 5</b></p> <p><b>HSAP good and best practice</b></p>	<p><b>Object of the Standard:</b> HSAP (<u>good and best practice</u>).</p> <p><b>Rating system:</b> Tiered with two levels of certification: International Good Practice and International Best Practice.</p>
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Public Comment Issue Raised	Response
<p><b>Scoring statements:</b> How would HESG with additional scoring statements still be quicker and less expensive than HSAP as a base?</p> <p>The selection of the proven-best practice criteria for the ratings for higher performance will be very important.</p>	<p>The Standard has more project performance requirements than the HESG, but covers fewer topics than the HSAP. Like the HESG, the Standard focuses on the environmental, social and governance topics of the HSAP and does not include the following topics: Integrated Project Management, Asset Reliability and Efficiency, Financial Viability and Economic Viability. The streamlined reporting format in the Standard's Assessment Tool will result in a faster assessment process than for a lengthier HSAP assessment report.</p> <p>The process of gathering evidence for advanced (best practice) performance requirements does not require a significant work increase to the Accredited Assessor. This is because the advanced performance requirements are easily incorporated into the evidence collection processes being undertaken for the minimum (good practice) performance requirements, i.e. in many cases they will be informed by the same verbal, visual and documentary evidence.</p> <p>The advanced (best practice) performance requirements for the Standard are fully based on the present HSAP best practice criteria.</p>
<p><b>Cross-compatibility:</b> Cross-compatibility is necessary between the Standard and the HSAP/HESG tools.</p> <p>If the HSGC and ME plan to continue promoting all the tools, then there should be some cross-compatibility with the standard and both the HSAP/HESG otherwise the result will be to prejudice potential users against one of the tools. Unless the goal is to ultimately retire one of the tools?</p>	<p>The Standard is not designed as a replacement for the HSAP/HESG tools; instead, it presents another form of using them, tailored to the very specific process around project certification. In other words, the HSAP/HESG tools will continue to be available and promoted for users alongside the Standard.</p> <p>At this point in time, it is difficult to predict how the demand for the various assessment tools will evolve and impact their uptake, and no actions will be taken to restrict or remove availability of the HESG/HSAP from use. For example, organisations such as the Climate Bonds Initiative might drive demand for use of the HESG for other purposes (e.g. green bonds). Companies may find the HESG</p>

## First Public Consultation Summary and Responses

	<p>tool a useful internal assessment tool to undertake self-evaluations of their performance. Companies may prefer to get the fuller HSAP assessment for more elaborated findings and commentary, and may request the Accredited Assessors to also produce an Assessment Report using the template for the Standard to submit to the HSGC for certification recognition following the harmonisation process described in the Assurance System.</p>
<p><b>Standard's ease of application:</b> Option 3 facilitates the application of the Standard, provides incentives for performance improvement and the best practice criteria can be developed easily based on the HSAP.</p> <p>Option 2 combines ease of application, comprehensiveness and results communication. It is preferred, especially when extending the Standard to a generation fleet, one of the future goals in the development of the Standard.</p>	<p>Both options 2 and 3 used the HESG as the basis for the object of the Standard. Option 3 is recommended because it includes additional advanced (best practice) performance requirements and thus provides incentives for performance improvement, which is a very important objective for the creation of the Standard. Option 3 has the same ability to later be extended to a generation fleet.</p>
<p><b>Rating levels:</b> Including intermediate levels of fulfilment between international good and best practice should be reflected on, and the selection of proven best practice criteria carefully thought through.</p>	<p>Intermediate levels of fulfilment between minimum (good practice) and advanced (best practice) performance requirements are part of the recommended certification scheme. Points are assigned for evidence of significant additional effort beyond minimum (good practice) performance requirements, based on each advanced (best practice) performance requirement statement that the project meets. These points against advanced performance requirements are the basis for the higher certification ratings. The exact scoring methodology is described in the Standard.</p> <p>The advanced requirement statements in the Standard's Assessment Tool are fully consistent with the existing HSAP best practice statements. Some refinements occurred to ensure the stand-alone statements are fully understandable and to avoid repetition. The process of incorporating the Standard's advanced requirement statements has been done in consultation with the Accredited Lead Assessors and the Working Group, and approved by the HSGC.</p>
<p><b>New ranking system:</b> Developing a new ranking might delay the Standard introduction or compromise its quality. If there is a high risk for this, use the already existing scoring system for the HESG and evaluate its performance (for 2 or 3 years) before review and develop a higher</p>	<p>There is no anticipated delay, as the system is based on existing comparable systems and already approved HSAP best practice statements.</p> <p>The Standard will have a monitoring and evaluation system and will be reviewed and updated in the future, based on the experience of its application.</p>

First Public Consultation Summary and Responses

<p>performance ranking system.</p>	
<p><b>Choice of tool:</b> HSAP is the comprehensive tool and should be used.</p> <p>HSAP is too comprehensive and would deter interest in utilising the certification.</p> <p>The options don't provide clear differences between each other in order to apply the Standard.</p> <p>Using the HESG would be a big mistake. It would devalue the currency right from the start.</p> <p>The selection of HESG would represent a down-grading. Reading between the lines of the public consultation document, the proposal of HESG as the key rating tool seems to be aimed at reducing the work and costs for dam-designers and builders. Desirable though that might appear in the short term, it will, in the medium term, reduce the value of the sustainability label you are seeking to create.</p>	<p>The HESG Plus is recommended as the Standard's Assessment Tool because it offers the best combination of comprehensiveness and practicality.</p> <p>The Standard's Assessment Tool incorporates the ESG good and best practice scoring statements of the HSAP. It therefore offers the same rigour and quality of the HSAP, only slightly more limited in scope (i.e. number of topics). In addition, the performance requirements of the Standard will be reviewed every five years to ensure that they continue to be relevant and based on most up-to-date science and knowledge, and lead to intended outcomes.</p> <p>The streamlined reporting format in the Standard's Assessment Tool results in a faster assessment process than for a lengthier HSAP assessment report. Through the faster reporting process, there are cost reductions to be made without sacrificing the quality of the assessment.</p>
<p><b>Credibility:</b> There are concerns with regards to greenwashing as certification would be project stage based, i.e. a "sustainable" project in the Operation stage could have not been in the Preparation and Implementation stages.</p>	<p>Assurance of credibility and avoidance of any perceptions of greenwashing are essential for the Standard and associated certification system. The concerns with certifying an operating stage project that has not been certified at an earlier project stage are well understood and are addressed in the Assurance System.</p> <p>An Operation stage certification is accompanied by statements clarifying that this does not provide any determination about the project's preparation or implementation (see Claims Policy in the Assurance System).</p> <p>In terms of legacy issues, these are defined as the impacts of previous projects that are unmitigated or not compensated with a similar good or service, or longstanding issues with a present (existing) project, or pre-existing issues in the present location of a new project. For the minimum requirements (good practice), projects are required to be responsible for their own impacts.</p> <p>At the Preparation and Implementation stages, the minimum requirements include understanding and scoping of cumulative impacts which could include legacy issues (HS-1 Environmental and Social Assessment and Management), and a number of</p>



## First Public Consultation Summary and Responses

	<p>topics require assessment and management of ongoing issues.</p> <p>At the Operation stage, in general the present condition is taken as the baseline, but some topic focal areas (project affected communities and project benefits within HS-4 Community Impacts and Infrastructure Safety, and HS-5 Resettlement) evaluate delivery of past commitments and identification of ongoing or emerging issues as part of the minimum requirements.</p> <p>For the advanced requirements (best practice) at all project stages, project performance requirements require taking into account ongoing issues and broad considerations, and contributing to outcomes that extend beyond the project's own impacts, which for older projects often include legacy issues.</p>
<p><b>Performance levels:</b> All propositions made for the Standard and the rating system share the basic flaw of HSAP: its focus on "common good" or "proven best" practice in the hydropower sector. This means the Standard does not draw any red lines that go beyond "don't do worse than has been before".</p>	<p>The HSAP was developed through consensus by a multi-stakeholder forum over a three-year period. The forum included representatives of governments, industry, financial institutions, civil society and NGOs. The proposed criteria for minimum (good practice) and advanced (best practice) performance requirements of the Standard are a result of this work and take into account the perspectives of the different stakeholders in hydropower. If a project cannot meet the minimum (good practice) criteria, it will not be certified. The criteria have been updated over time to include new provisions around achieving the Free, Prior and Informed Consent of Indigenous Peoples and minimum acceptable thresholds for climate change mitigation, through multi-stakeholder consultation and decision-making.</p>
<p><b>ISEAL certification:</b> ISEAL certification of the Standard is recommended.</p>	<p>ISEAL certification for the standard is being pursued but will not delay the standard launch as ISEAL certification can only be pursued for existing Standards. It should be noted that the process to achieve ISEAL Code Compliant Status may take up to three years.</p>
<p><b>Design option:</b> Option 4 with a score of 5 required for environmental and social topics is suggested.</p> <p>Recommendation to establish knock out criteria that filter out non-qualified dams on the specific topics.</p> <p>The largest sustainability impacts from hydropower come from early stage planning. Unfortunately, this has been lost in the development of the Standard as</p>	<p>The scoring criteria at level 3 is expressed in every topic as a minimum requirement that all projects are expected to achieve regardless of their size, location and complexity, as determined through the multi-year multi-sectoral global process of the Hydropower Sustainability Assessment Forum (2008-2010). An initial screening process is not recommended at this stage in the development of</p>

First Public Consultation Summary and Responses

<p>its focus is only on the Preparation, Implementation and Operation stages and the Early Stage focus has been lost.</p>	<p>the Standard. Though, it should be noted that concerns around project siting and design are addressed in the Preparation stage performance requirements. In addition, in determining project eligibility, Accredited Assessors are encouraged to have discussion with project proponents on system boundaries and any red flags which could halt a project's path towards HS Certification. These could include significant external conflicts (civil war, interstate disputes), criminal records of key players, and legacy issues beyond resolution.</p> <p>The Standard's rating system offers a tiered rating system (Certified, Silver and Gold) for higher performance and is aligned with the overall design of the HST. The Theory of Change identifies strategies to incentivise project proponents to reach these higher levels.</p> <p>The topic selection and balance of topic numbers in the Standard is weighted towards environmental and social topics, and is a preferable approach to weighting of scores.</p> <p>At the Early Stage, there is only a project concept which is highly likely to change based on more detailed information through the feasibility studies, ESIA and design process. Therefore, a concept of a project is not certifiable. The HSAP's Early Stage tool can continue to provide an assessment process against basic and advanced expectations for projects at this concept/pre-feasibility stage.</p>
<p><b>System-scale renewable energy:</b> System-scale renewable energy planning should be considered during evaluation (need and strategic fit) and minimum standard certification entry requirements should be set.</p> <p>There is a big challenge with considering a particular hydropower project "sustainable" without accounting for where it has been located within a basin relative to other potential sites that may have fewer impacts.</p> <p>The largest sustainability impacts from hydropower come from early stage planning. Unfortunately, this has been lost in the development of the Standard as its focus is only on the Preparation, Implementation and Operation stages and the Early Stage focus has been lost.</p>	<p>Assessing whether there is a system-scale renewable energy plan is beyond the scope of the HST, which focus on a single project.</p> <p>Though the Early Stage assessment tool is not included in the Standard, the criteria within the recommended Standard's topics at the Preparation stage include consideration of a project's strategic fit with identified needs for water and energy services and whether cumulative impacts have been assessed.</p> <p>Projects need to meet minimum performance requirements (good practice) in all relevant topics to achieve certification against the Standard.</p>

## 2. Certification process

Summary of options	
<p><b>Option 1 (Recommended)</b> <b>Assessment, Publication and Post-assessment Application</b></p>	<p>Existing assessment process and additional post-assessment step of Application by the project proponent to the HSGC, via its Management Entity, after the public comment period.</p>
<p><b>Option 2</b> <b>Pre-assessment Application, Assessment, Publication and Recommendation</b></p>	<p>The certification process includes the existing assessment process and adds on a pre-assessment step of Application, an additional review of the final report and a post-assessment step of Recommendation, all managed by the Management Entity.</p>

Public Comment Issue Raised	Response
<p><b>Gap management:</b> The definite certification against international good practice should be conditional to the successful implementation of a gap management plan.</p>	<p>To achieve certification, a project needs to meet the minimum threshold (basic good practice in all topics) at the time of assessment. Certification is not conditional on the implementation of a gap management plan. In other words, a project that does not meet the minimum performance requirements (good practice) of the Standard will not achieve certification.</p> <p>Project proponents who do not meet the minimum performance requirements of the Standard will be encouraged to conduct a gap action plan which is produced as part of the HESG assessment report and assists the project proponent / owner / operator to know where further efforts could be most effectively focused. The Standard would offer the project proponent the opportunity to improve its performance upon future reassessment (see Section 3.7 in the Assurance System).</p>
<p><b>Quality assurance:</b> Quality control measures should either be independent from existing management entities, such as through an independent audit, or ensure transparency in some way to avoid impartiality concerns.</p> <p>Current assessment process offers sufficient quality control measures.</p> <p>Option 2 to be modified to include an independent audit of the certification assessment.</p> <p>Even though the ME will publish the report for public comment, we would suggest that the direct</p>	<p>There are a number of layers of quality control throughout application of the HST, which are included in the HS certification scheme.</p> <p>At present these include:</p> <ul style="list-style-type: none"> <li>- Independent Accredited Assessors who have passed a number of training and qualification thresholds and who must verify the absence of conflicts of interest for every assessment.</li> <li>- Triangulation of objective evidence: assessors must seek as far as possible to</li> </ul>

## First Public Consultation Summary and Responses

<p>engagement with the assessor may cast doubt upon the independence of the report. Greater independence would be demonstrated if the assessor was accountable to the ME rather than the applicant. It is also unclear as to whether the ME makes the final decision or if that is left to the AA.</p>	<p>get consistency from three different types of data: project documents, a site visit and stakeholder interviews.</p> <ul style="list-style-type: none"> <li>- A public comment period of 60 days during which anyone can provide comments on the assessment results. Assessors will then be required to respond to each comment. All comments and responses are a matter of public record.</li> </ul> <p>All existing quality control measures will be maintained at a minimum, and refined and improved as part of development of the Standard's Assurance System. Further quality control measures to be brought in with the certification scheme include a verification process through multi-stakeholder oversight (Hydropower Sustainability Governance Committee) of all certification decisions. These include: a Conflicts of Interests policy, Appeals and Complaints Mechanism and a Claim policy with final oversight from the multi-stakeholder Hydropower Sustainability Governance Committee, as described in the Assurance System.</p> <p>An independent audit of the certification process is not recommended. As the assessors are independent, there is no need for an additional third-party review of an assessment. The HS Secretariat (previously known as Management Entity) reviews the final report for alignment with all templates and appropriate inclusions, confirms that public comments were appropriately responded to, and provides a recommendation for certification rating to the HS Council (previously known as HSAC) for their consideration and decision on approval.</p>
<p><b>Continuous improvement:</b> Option 1 does not incentivise continuous improvement enough because of the absence of HSGC review, which would have allowed for more transparency through the involvement of varied stakeholders with multiple skills, experiences and networks.</p>	<p>Incentivising continuous improvement is seen to be best delivered through a tiered approach (minimum and advanced performance requirements) of the recommended Standard and in the rating system that recognises and awards higher levels of performance. The certification process is an administrative aspect of the standard.</p> <p>Option 1 for the certification process is in line with the existing assessment process, but adds a post-assessment step of "Application" by the project proponent to the HSGC, via its Management Entity, after the public comment period.</p> <p>The proposed approach for the Standard involves HSGC oversight. The HS Secretariat (previously</p>

## First Public Consultation Summary and Responses

	<p>known as ME) notifies the Governance Committee of its intention to certify the project and then issues the certification, if no objection or concern is raised by the Governance Committee. Should a member of the HS Governance Committee have a concern about the allocation of HS certification for the project, the Governance Committee chair will determine a process by which the Governance Committee can inform itself about the concerns and provide clarity to the HS Secretariat (previously known as ME) regarding the issuing of the HS certification.</p>
<p><b>Certification process:</b> Option 1 keeps administrative process as light as possible and offers sufficient quality control measures via an independent assessment with Accredited Assessors and a public comment period. The application step is not required. Having the assessment first allows the company to determine if they want to pursue certification based on the assessment outcomes.</p>	<p>This comment is in line with the rationale behind the recommendation to proceed with Option 1.</p>
<p><b>Certification process:</b> Option 2 includes a “pre-assessment” stage, which is crucial to quality-assurance work.</p>	<p>A pre-assessment stage can improve the assessment quality, but adds to the time, cost and administrative burden of implementation of the Standard. Given the number of layers of quality assurance, it is not viewed as crucial to assurance of quality. However, this will be included as a key point of review following the launch of the Standard, and may be introduced in the future if deemed necessary to ensure full credibility whilst being able to be practically implemented.</p> <p>See also the response in Section 3 titled Functionality.</p>
<p><b>Certification process:</b> It needs a failure certificate option.</p>	<p>A failure certificate is not recommended by the Working Group. Such a measure would undermine the continuous improvement approach and diminish interest in applying for the standard. If there is very good take-up of certification across the global hydropower sector, then those projects that are not certified will have more questions asked about them. The HS Council, through its Theory of Change and through the “How-to” guides on HST topics, is strongly committed to assisting and encouraging projects and their associated stakeholders on implementation of good practice measures.</p>
<p><b>Certification process:</b> HSGC’s recommendation is to use the existing framework whereby applicants hire Accredited Assessors. Even though the ME will</p>	<p>There does not appear to be any advantage gained by having the HS Secretariat (previously known as ME) appoint the Accredited Assessors (AAs) versus</p>

## First Public Consultation Summary and Responses

<p>publish the report for public comment, we would suggest that the direct engagement with the assessor may cast doubt upon the independence of the report. Greater independence would be demonstrated if the assessor was accountable to the ME rather than the applicant. It is also unclear as to whether the ME makes the final decision or if that is left to the AA. As the ME is ultimately responsible for the standard, the ME (or the HSGC) should be responsible for making the final decision.</p>	<p>having the project proponent directly engage with the AA.</p> <p>AAs must attest to the absence of any conflicts of interest with any projects they are involved in. Concerns regarding a lack of independence of AAs can be raised with the HSGC and will be considered seriously. Please refer to the Conflicts of Interests policy, and Appeals and Complaints Mechanism described in the Assurance System.</p> <p>The AAs score the project’s performance against the criteria statements based on verbal, visual and documentary evidence. This evidence must be cited in the AA’s report in a manner that is transparent and can be checked by another AA, whilst protecting confidentiality of individual interviewees where needed.</p> <p>The report of the AAs is the project’s assessment report, which shows the scores for the project against the Standard. Following a period of public comment and AA responses to this, the project proponent can apply to the HSGC, via the HS Secretariat, to be certified at a level commensurate with the assessment results. The HSGC is responsible for the final decision.</p> <p>AAs are obligated to act as independent professionals, to respect a licence agreement annually updated with the HS Secretariat (previously known as ME), and to follow a code of ethics. AA competency concerns are and will continue to be able to be raised with the HSGC via the HS Secretariat (previously known as ME) in line with the Appeals and Complaints Mechanism described in the Assurance System.</p>
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### 3. Sustainability in progress recognition

<b>Recommendation</b>	
Projects that have been assessed against the Standard but have not met the requirements will receive a “Sustainability in Progress” recognition.	
Public Comment Issue Raised	Response
<p><b>Credibility:</b> Certifications should adopt a “pass/fail” or well-defined levels approach, especially to avoid perceptions of greenwashing and weakening the Standard’s credibility.</p>	<p>This recognition was proposed to promote continuous improvement and to incentivise the uptake of the Standard. However, based on the comments received, the Working Group</p>

## First Public Consultation Summary and Responses

<p>WWF strongly opposes to provide a label of "Sustainability in Progress" and recommends exploring other means of achieving certification.</p> <p>Sustainability in Progress creates a loophole for projects, that are not sustainable to claim the standard anyway. There would be great danger that such a label would give unsustainable projects access to financing (especially in early stage assessment) they would otherwise not get.</p> <p>Sustainability in progress is a wide-open comment. It does not indicate the real progress achieved and how much shortfall or gap exists between present status and target.</p>	<p>reconsidered and decided to adopt the category "Seeking Certification".</p> <p>Projects being assessed as part of the process of seeking certification are able to communicate that they are in an assessment process, but this should in no way imply that Certification is pending. A project that has been assessed and does not meet the minimum requirements for HS Certification will be noted as "Seeking Certification" on the HS website for a period of 12 months. Projects listed as "Seeking Certification" are not able to make any claims until they have achieved "Certified" status.</p> <p>This way, projects receive recognition for making the effort to try to obtain certification and to showcase that they are in the process of undertaking this improvement journey with an internationally recognised category that avoids potential for greenwashing.</p> <p>Communication and transparency around this recognition will be crucial.</p>
<p><b>Functionality:</b> I support the idea of some recognition for trying and transparency, but if the criteria is that a project must meet basic good practice on all topics, why would a proponent apply for a rating unless they have met that requirement upon completion of an assessment? Unless any project that does an assessment, regardless of application for a rating will receive such recognition?</p>	<p>Projects will not apply for a rating unless they have met all basic good practice criteria on all topics. Projects that do not meet this level of practice will be recognised as "Seeking Certification", as discussed above.</p>
<p><b>Time limitation for higher performance:</b> A time limit for the achievement of higher performance as well as follow-up monitoring processes and an analysis of available budget to that end should be put in place. Projects on their way to international best practice and associated improvements should be recognized as well.</p>	<p>To achieve certification, a project needs to meet the minimum threshold of good practice (Level 3 on all topics) at the time of the assessment.</p> <p>Projects can apply for re-assessment earlier than the duration period of the rating under strict rules that is specified in Section 3.7 of the Standard's Assurance System.</p> <p>This will be the case for projects that are closing gaps against the minimum performance requirements for certification (good practice) as well as for projects on their way to meeting advanced (best practice) performance requirements criteria statements.</p>
<p><b>Minimum requirements:</b> the minimum requirements to obtain 'Sustainability in Progress', as surely a project with all scores of 1 could not be</p>	<p>The Working Group has reconsidered the recognition "Sustainability in Progress" and adopted "Seeking Certification" which can be applied to all</p>

## First Public Consultation Summary and Responses

<p>said to be 'in progress', raising the question of how many significant gaps is acceptable.</p>	<p>projects that have not achieved minimum performance requirements.</p>
<p><b>Duration of recognition:</b> How long can a project remain with a 'Sustainability in Progress' rating before being struck off?"</p>	<p>The Working Group has reconsidered the recognition "Sustainability in Progress" and adopted "Seeking Certification". Projects being assessed as part of the process of seeking certification are able to communicate that they are in an assessment process, but this should in no way imply that certification is pending. A project that has been assessed and does not meet the minimum requirements for HS certification will be noted as "Seeking Certification" on the HS website for a period of 12 months. Projects listed as "Seeking Certification" are not able to make any claims until they have achieved "Certified" status.</p>
<p><b>Resulting consequences:</b> The consequence of (not) achieving the Standard are not clear, i.e. does it lead to a reward/sanction?</p>	<p>There are no sanctions for not meeting the minimum performance requirements (good practice) of the Standard.</p> <p>Projects that do not meet the minimum certification performance requirements will be listed on the HS website in the manner discussed above.</p> <p>In an HESG assessment report, an action plan is included with recommended actions to close the gaps and achieve better practices. This is in the interest of continuous improvement.</p> <p>The HS Secretariat (previously known as ME) will activate parallel processes to assist businesses to address gaps. As implementation of the Standard progresses, the HS Secretariat (previously known as ME) will increase its understanding of where capacity-building and assistance will be most beneficial.</p> <p>A reassessment of the project is always possible in the path to certification.</p>

### 4. Duration of the sustainability rating

<p><b>Recommendation</b></p>
<p>A Sustainability Rating is specific to the life cycle stage tool (Preparation, Implementation, Operation) and is valid for up to five years (or ten years in the case of projects of more than ten years from the date of commissioning of the first unit).</p>

<p><b>Public Comment Issues Raised</b></p>	<p><b>Response</b></p>
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## First Public Consultation Summary and Responses

<p><b>Time limitation:</b> Limit should be 3 years. Limit should be 5 years. 10 years is reasonable – shorter duration would disincentivise use of the standard.</p>	<p>Based on the feedback received through the public consultation process, the Working Group recommends that the duration of the rating is 3 years for Preparation and Implementation stages, and 5 years for the Operation stage. This provides a time period long enough to capture changes in the project’s situation regarding the Standard’s performance requirements, but short enough to avoid any need for an administrative process around annual audits or certification renewals. The five-year period for operating projects is also in line with the Standard’s five-year review period.</p>
<p><b>Auditing:</b> Annual audits of certified plants. It is unclear how the project is monitored during the term.</p>	<p>The Working Group does not recommend that annual audits of certified plants are a process requirement. The assessment process is a major commitment for a project proponent and takes considerable time and effort.</p> <p>Shortening the recommended duration periods, as recommended above, removes the need to have an annual process.</p> <p>Reassessments are recommended to be in line with the duration of sustainability rating, or earlier (subject to the governance rules) in line with the project proponent’s aspiration to demonstrate improvements.</p>
<p><b>Change in Operations:</b> A change of operation parameters or in ownership that could be detrimental to the sustainability rating should be notified to the ME.</p>	<p>Procedures for notifying the HSGC of any major changes in a certified project’s status or performance are included as part of the HS Assurance System. These procedures will be readily accessible on the HS Secretariat (previously known as ME) website.</p>
<p><b>Certification:</b> There are concerns regarding the certification to be obtained in all three stages for recently developed projects.</p>	<p>Projects are assessed according to their life cycle stage. The certification label will make it clear that it applies to that particular project stage in the particular year it is awarded. Statements about project stage will accompany certification to make it clear that no recognition of certification is to be implied about earlier project stages (see Claim Policy in the Assurance System).</p>

## 5. Rating renewal and update process

<b>Recommendation</b>
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## First Public Consultation Summary and Responses

A lighter methodology is available for renewing at the end of the certification period or for updating ratings if within the time period of a rating.

Public Comment Issues Raised	Response
<p><b>Methodology:</b> Agree with lighter methodology and consideration of virtual evaluations.</p> <p>A full assessment should be required.</p> <p>A longer period of validity makes the option of a lighter methodology less attractive.</p> <p>It is important to make sure that there is no discount on project performance upon renewal.</p>	<p>The Working Group recommends that a full assessment against the Standard is required at the end of the certification period, fully in line with the certification process steps outlined in the HS Assurance System.</p> <p>The recommendations on duration of the certification period are made based on timeframes within which changes may occur.</p>
<p><b>Renewal process:</b> The renewal should be independent of IHA.</p>	<p>The existing multi-stakeholder body, the HSGC, has and will continue to have the oversight in all governance matters relating to the Standard and certification, including with renewals. IHA has no control over the HSGC.</p> <p>IHA will actively work with its membership on helping achieve the outcomes and impacts expressed in the Theory of Change, and is fully committed to the vision expressed in this document.</p>
<p><b>Credibility:</b> There are concerns regarding “Sustainability-In-Progress” projects using renewals as a loophole and the lighter methodology used.</p>	<p>Projects that do not achieve certification requirements, i.e. that do not meet minimum performance requirements (good practice) on all relevant topics, are eligible for reassessment processes as outlined in the HS Assurance System. These processes exist already and have been applied by several projects, particularly in the case where one action that can be implemented by the project within a short timeframe can close a critical gap. Nothing about the design of these processes enable a “loophole” to be exploited.</p>

## 6. Changes to the Standard

Recommendation
<p>A review of the Standard is conducted every five years. Each project Sustainability Rating will be published with a timestamp, so it is clear which version of the Standard was used.</p>

Public Comment Issues Raised	Response
<p><b>Review:</b> Every 5 years.</p> <p>Periodic review is supported.</p>	<p>The Working Group recommends that the Standard be reviewed every 5 years, which is in line with ISEAL requirements.</p>

## 7. Appeals process

Recommendation
External stakeholders can appeal a project Sustainability Rating by submitting an appeals form to the Hydropower Sustainability Governance Committee for its consideration.

Public Comment Issue Raised	Response
<p><b>External stakeholders:</b> Abuse when it comes to external stakeholder appeal could represent an issue. A two-step approach should be considered. First whether to accept the request for appeal, and second its actual adjudication of the appeal.</p> <p>The only Appeal available should be for the respondent (i.e. to appeal an unfavourable decision by the Committee).</p> <p>An appeal be allowed to all stakeholders (project affected people, local environmental groups, basin organizations and regulators) even if the appellant did not submit comments and along all certification lifespan.</p> <p>Include an appeal process for assessors performance.</p>	<p>In situations where the HS Secretariat (previously known as ME) becomes aware of a complaint against an Accredited Assessor or an appeal against an assessment finding in relation to the HS certification, a two-step approach is recommended by the Working Group and outlined in the Standard’s governance documents; first whether to accept the complaint or the request for appeal, and second its actual adjudication of the appeal. The two-step approach ensures that parties raising informal complaints are given the opportunity to submit these formally, and prevents risk of abuse when it comes to potentially frivolous complaints or appeals. This is in line with the World Bank Inspection Panel.</p> <p>Appeals can only be made within the first 12 months of certification, after which the appeal is considered invalid and is not processed. Appeals are open to all stakeholders (project affected people, local environmental groups, basin organisations and regulators) even if the appellant did not submit comments. This process is further described in the Appeals and Complaints Mechanism part of the Assurance System.</p>
<p><b>HSGC decision-making process:</b> The percentage required for and HSGC decision to be made should be clarified.</p>	<p>The HSGC functions on a consensus decision-making process. Where there is a lack of alignment within the HSGC, consensus-building procedures will be implemented, which will include how divergent views are noted if needed in an ultimate decision. This is fully in line with how the Hydropower Sustainability Assessment Forum functioned in development of the HSAP.</p>
<p><b>Appeal validity:</b> An appeal should be allowed all along the lifespan of a certification as well as for an assessor’s performance.</p>	<p>The Appeals and Complaints Mechanism (including appeals against certification status and complaints against assessor performance) will consist of a two-step approach: first whether to accept the request for appeal and second the actual adjudication of the</p>

## First Public Consultation Summary and Responses

	<p>appeal. The two-step approach prevents risk of abuse when it comes to potentially frivolous appeals. Appeals can only be made within the first 12 months of Certification, after which the appeal is considered invalid and is not processed.</p>
<p><b>Submission process:</b> The appeals submission process should be clarified for rural affected communities that may not have internet access, as well as relevant assistance if needed.</p>	<p>The appeal process requires project proponents to identify the methodology they will use to ensure comments can be obtained from project-affected communities who would not be able to engage effectively with the website-based public comment mechanism, and this needs to be approved by the HS Secretariat (previously known as ME).</p>
<p><b>Bias:</b> There are concerns of bias when it comes to the composition of the HSGC, its neutrality and impartiality.</p>	<p>The HSGC has been designed to avoid concerns of bias and impartiality. The Standard will continue to be governed by the HSGC, which is a multi-stakeholder body made up of environmental and social NGOs, governments, financial institutions and industry.</p> <p>The HSGC will look to guidance from ISEAL to identify further measures it can incorporate to increase credibility, avoid concerns of partiality, and to show independence from the hydropower industry.</p>
<p><b>Role of AAs:</b> Accredited Assessors should constitute an “advisory group” to the HSGC to provide a verdict on such concerns, instead of bringing in an “Independent Accredited Lead Assessor”.</p>	<p>The merits of an AA reference or advisory group to the HSGC are understood to be so those who work most closely with the Standard and its detailed scoring criteria and assessment processes can give insights to the HSGC on appropriate matters where there are no conflicts of interest.</p> <p>The constitution of an advisory group to the HS Secretariat (previously known as ME) or HSGC will be discussed with the HS Council, with the aim of making a decision before the launch of the Standard.</p>

## 8. Governance of the Standard

Recommendation
<p>The Hydropower Sustainability Governance Committee continues to be the governing body for the Standard and all HST products. The existing Charter and Terms of Use are modified following the guidance from this consultation and the decision on the Standard.</p>

Public Comment Issue Raised	Response
<p><b>Impartiality:</b> A more rigorous oversight by HSGC</p>	<p>Considerable effort will be put into ensuring rigorous</p>

## First Public Consultation Summary and Responses

<p>is needed.</p> <p>The certification management body should be independent and truly impartial to increase the standard's credibility.</p> <p>There exist doubts whether this body is sufficiently impartial to fulfil this role.</p>	<p>oversight, independence, impartiality and credibility of the HSGC in elaboration of the governing documents and assurance systems. The HS Secretariat (previously known as ME) will get independent review of the proposed Assurance System prior to making a recommendation to the HSGC. ISEAL certification will be sought as soon as it is able to be realised, which will provide an extra layer of assurance regarding credibility of the standard.</p>
<p><b>Decision-making process:</b> The process to adopt when a consensus is not reached should be clearly defined.</p> <p>Accredited Lead Assessors (ALAs) should be more involved.</p>	<p>Consensus decision-making is sought at all times, recognising and respecting divergent views and that everything any individual organisation seeks will not be fully met.</p> <p>If the Working Group does not reach consensus on its recommendations to the HSGC, the decision matters will be presented for HSGC to make a decision accompanied by information to inform the HSGC decision.</p> <p>Where there is a lack of alignment on decision-making within the HSGC, consensus-building procedures will be implemented, which will include how divergent views are noted if needed in an ultimate decision. This is fully in line with how the Hydropower Sustainability Assessment Forum functioned in development of the HSAP.</p> <p>The constitution of an advisory group or reference group of ALAs to the HS Secretariat (previously known as ME) or HSGC shall be discussed with the HS Council as responded to above.</p>
<p><b>Certification management:</b> It should be ensured that the additional workload for the HSGC does not cause certification delays.</p> <p>Archives of all certifications should be publicly available.</p>	<p>The HS Secretariat (previously known as ME) shall manage and guarantee all required resources are in place for the good functioning of the HS certification scheme.</p> <p>Archives of all certifications will be publicly available. A project that is assessed against the Standard has the choice about whether to make the assessment report public or not, but will not be certified unless it is published and a public comment period has been undertaken.</p>

## 9. Processes for communications and transparency

### Recommendation

## First Public Consultation Summary and Responses

The Standard will leverage the existing Hydropower Sustainability brand and develop new marketing graphics and labels.

Public Comment Issue Raised	Response
<p><b>Partnerships:</b> Large organizations should be reached out and convinced into supporting the standard.</p> <p>Partnering with entities in the finance sector, e.g. the Climate Bonds Initiative, would be ideal to enhance communication.</p>	<p>The communication and engagement strategy will include outreach to large organisations and financial institutions.</p>
<p><b>Marketing:</b> IHA should consider ads appearing on its social networks and websites displaying projects assessed.</p>	<p>The communication and engagement strategy will include web press releases and social media campaigns.</p>
<p><b>Communications:</b> Emphasis should be put on the intent of the standard when communicating.</p> <p>The levels of certification should be named, e.g. "Silver", "Gold", "Platinum" in LEED building standard.</p> <p>Confusion should be avoided when it comes to the adequation between basic good practices and sustainable projects.</p>	<p>A Theory of Change has been developed to better understand, communicate and evaluate the outcomes and impact of the Standard.</p> <p>The Standard labels (Certified, Silver or Gold) which are part of the certification rating system reflect the degree of additional effort put in by a project to achieve performance above good practice requirements.</p>

## 10. Quality of the consultation paper

Public Comment Issue Raised	Response
<p><b>Theory of Change:</b> The reason for the need of the standard is not properly advocated in the paper.</p> <p>The consultation paper does not focus on the content of the standard. The desired outcome is not clear either.</p>	<p>A Theory of Change has been developed and is a key section of the Standard.</p>
<p><b>Ease of adoption:</b> The standard may not be adopted as easily by development banks, as opposed to commercial institutions.</p>	<p>Proactive engagement and capacity building will contribute to increasing adoption of the Standard among key global actors. Those institutions that have their own standards may not be able to tie decisions directly to certification, but the certification may help inform their decisions (as is presently the case with HSAP and HESG assessment reports).</p>
<p><b>Other hydropower-related issues:</b> Ageing infrastructure issues, as well as GHG emissions and the potential role of the G-res tool, which was not</p>	<p>These topics are covered in the performance requirements of the proposed HS Standard.</p>

## First Public Consultation Summary and Responses

<p>mentioned, should be given more attention.</p>	
<p><b>Existing issues with HSTs:</b> Existing problems with the HSAP were not mentioned.</p>	<p>The consultation paper presented advantages and disadvantages of each option. The development of the Standard includes a technical review every 5 years to ensure any apparent problems are addressed.</p> <p>These five-yearly reviews are intended to ensure that all practical problems encountered with the application of the HS Standard can be rectified, that the performance requirements are appropriately expressed and calibrated to good and best practice, and that emerging practice norms are adequately embedded.</p> <p>There is nothing to stop an earlier amendment to the Standard by the HSGC if there are clear edits required earlier than in the five-year review process.</p>
<p><b>System-scale renewable energy:</b> More proposals regarding the fit of hydropower with largely based solar and wind renewable energy systems should be made.</p>	<p>The strategic fit of the project with needs for water and energy services, and relevant policies and plans is covered by the performance requirements at the Preparation Stage. These considerations also come through strongly in the advanced (best practice) performance requirements included in the Standard.</p>
<p><b>Project stages:</b> “The HSAP/HESG Operation (O) stage tool is tailored for operations. A project could have been developed irresponsibly, either in its fundamentals (location, design) or its construction, but its operations may still meet the O stage standard. A project may have met only basic good practice during implementation but is awarded a higher rating for some activities during operations that meet proven best practice.</p> <p>The paper did not discuss the question of how to rate performance during the early stage, preparation, and implementation stages when certifying an operation stage project.</p>	<p>The certification is clearly aligned to the stage of the project. Any labelling will clearly designate stage and year.</p> <p>Only projects in Preparation, Implementation and Operation stages can be certified. Early Stage projects are not eligible, for the reasons stated in the introduction to the Early Stage HSAP. The scope regarding eligible project stages is clarified in the Standard under section 3.1.</p> <p>Assurance of credibility and avoidance of any perceptions of greenwashing are essential for the Standard and associated certification system. The concerns with certifying an operating stage project that has not been certified at an earlier project stage are well understood and are addressed in the Assurance System.</p> <p>An Operation stage certification will be accompanied by statements clarifying that this does not provide any determination about the project’s preparation or implementation.</p> <p>In terms of legacy issues, these are defined as the impacts of previous projects that are unmitigated or</p>

First Public Consultation Summary and Responses

	<p>not compensated with a similar good or service, or longstanding issues with a present (existing) project, or pre-existing issues in the present location of a new project. For the minimum requirements (good practice), projects are required to be responsible for their own impacts.</p> <p>At the Preparation and Implementation stages, the minimum requirements include understanding and scoping of cumulative impacts which could include legacy issues (HS-1 Environmental and Social Assessment and Management), and a number of topics require assessment and management of ongoing issues.</p> <p>At the Operation stage, in general the present condition is taken as the baseline, but some topic focal areas (project affected communities and project benefits within HS-4 Community Impacts and Infrastructure Safety, and HS-5 Resettlement) evaluate delivery of past commitments and identification of ongoing or emerging issues as part of the minimum requirements.</p> <p>For the advanced requirements (best practice) at all project stages, project performance requirements require taking into account ongoing issues and broad considerations, and contributing to outcomes that extend beyond the project's own impacts, which for older projects often include legacy issues.</p>
<p><b>Cascade, river basin and company fleet:</b> A further issue is the potential of awarding certification to groups of projects (in a cascade, river basin, or a company's fleet). This may offer some potential for cost savings. This was not discussed in the paper.”</p>	<p>Only individual projects, new and existing, are eligible for assessment and certification against the HS Standard. There are no eligibility restrictions on size or location. Multipurpose dams can be assessed against the Standard if they have a hydroelectrical component.</p> <p>In the future, the HS Secretariat (previously known as ME) will develop processes in which multiple power stations could be assessed under a single certification, in cases in which the stations are designed to function in cascade or as a complex, are at the same life cycle stage and under the same owner. At present these processes are not developed, and so cascades and complexes are not eligible for a single certification. Clients could consider undertaking an HSAP Assessment for a cascade or complex and then follow the harmonisation process to have the individual stations certified if eligible.</p> <p>Certification for a river basin or a company is not</p>



## First Public Consultation Summary and Responses

	<p>within the scope of the Standard at this stage. The Working Group notes this comment and does not exclude the possibility of further development in this direction in a future review of the Standard.</p>
<p><b>Financial viability:</b> There is a lack of understanding related to the financial mechanism that will make the Standard feasible. It should include fund allocation to restore ecosystems impacted by dams.</p>	<p>The full cost of certification against the Standard has yet to be defined. This will include an assessment cost and a certification cost based on the existing assessment fees and equivalent standard certification fees.</p> <p>Allocation of funds for dam impact restoration is not part of the proposed financial model, but may be part of future considerations once the Standard has become established.</p>
<p><b>Topics covered:</b> The document does not explain clearly the difference between the sustainability topics covered by the HESG versus the HSAP.</p>	<p>The existing HESG includes all the environmental, social and governance good practice requirements of the HSAP. Further information can be found at the HS website, specifically on the Standard FAQ page. Further queries about the tools are accepted at <a href="mailto:sustainability@hydropower.org">sustainability@hydropower.org</a>.</p>

## 11. Additional comments

Public Comment Issue Raised	Response
<p><b>Standardisation:</b> Hydropower cannot be standardised as projects are site-specific.</p> <p>It is rather a developer's and owner's performance that can be assessed with regards to sustainability, subjecting the certification to potential issues when a plant is sold.</p> <p>A global standard is not feasible as requirements across countries are too varied.</p>	<p>The Hydropower Sustainability Tools (HST) have demonstrated how the performance of individual hydropower projects can be assessed with a globally applicable framework. The recommended HS Standard is based on the same requirements and assessment process of these tools.</p>
<p><b>Standard approach:</b> A people-centric approach rather than a lobbyist-pressurized model should be adopted for the development of the Standard.</p> <p>The access of local populations to independent legal and technical staff for the expert independent analysis to be of added value.</p>	<p>The Standard and all associated processes are governed by the HSGC, a multi-stakeholder body made up of environmental and social NGOs, governments, financial institutions and industry.</p> <p>Interviews by the AAs with local populations are an essential component of the assessment process, including those who represent civil society groups and who hold opposing views about a project. An assessment is not a legal review.</p>
<p><b>Conflicts:</b> Discussions should be held to make sure that this Standard does not conflict with existing ones.</p>	<p>The HS Secretariat (previously known as ME) has been and will continue to be in close communications with existing standards, such as the</p>

## First Public Consultation Summary and Responses

	<p>Low Impact Hydropower Institute in the United States and the Environmental and Social Framework of the World Bank.</p>
<p><b>Consultation:</b> More technical details in this paper would have been appreciated by stakeholders.</p> <p>High quality, transparency and consultation are important objectives to achieve.</p>	<p>Project performance requirements of the Standard can be found in the Standard. Because the Standard is based on the existing tools and their criteria, the consultation paper did not focus on what these included, but rather on the governance frameworks and assurance systems associated with using the Standard in the HS certification scheme. The details of the hydropower performance requirements will be part of the focus of the five-yearly review of the Standard.</p> <p>High quality, transparency and consultation are driving principles in all aspects of the Standard.</p>
<p><b>First assessment:</b> ENGIE suggests that the Jirau HPP be assessed by the new HP Standard.</p>	<p>All hydropower projects are welcome to be assessed against the Standard.</p>
<p><b>Theory of Change:</b> Issues related to hydropower, e.g. concrete environmental and socio-economic impacts, should have been mentioned in this paper to better understand the role of the Standard in assessing projects.</p> <p>While I can see how a standard is a more understandable and accessible format for the HST, I am not sure the consultation paper has laid out a strong case for why the standard is needed, what gap it fills that the current tools don't.</p>	<p>The Standard is based on the existing Hydropower Sustainability Tools (HST) and their criteria, which fully address the range of material sustainability issues that challenge hydropower projects globally.</p> <p>The consultation paper was focused on the governance frameworks and assurance systems associated with using the Standard in a certification scheme.</p> <p>A Theory of Change is included in the Standard, and outlines areas of key concern and the vision that the Standard is seeking to achieve.</p>
<p><b>Financial viability:</b> Financial and economic feasibility, as well as strategic fit are to be better considered.</p>	<p>The strategic fit of the project with needs for water and energy services, and relevant policies and plans is covered by the project performance requirements in the Preparation stage assessment tool. These considerations also come through strongly in the advanced (best practice) performance requirements included in the Standard.</p> <p>Financial and economic viability are not included in the Standard, as the selection and balance of performance requirements in the Standard is weighted towards environmental, social and governance issues. Future review of the Standard will consider whether additional requirements on financial and economic feasibility should be included.</p>
<p><b>Partnerships and IHA bias:</b> LIHI wants to partner up for the development of the Standard,</p>	<p>Partnerships are a critical part of the forward roadmap for hydropower sustainability efforts. The</p>

## First Public Consultation Summary and Responses

<p>work towards the certification of their already LIHI-certified facilities and be considered for inclusion in the HSAC. LIHI is also considering the development of a global country-specific framework in its future.</p> <p>I think a longer discussion may be warranted with some MDBs about potential conflicts arising from a new standard and their existing standards and whether this helps or hurts efforts to more formally institutionalize their use of the HSTs.</p> <p>The paper was short in providing a view beyond IHA experience with HSAP and HESG and in screening options through the broader lens of other certifications schemes.</p>	<p>Council will actively engage with partners to combine and standardise efforts. This will include partnerships beyond IHA membership, including partnerships with the financial and public sectors, NGOs, civil society and existing standard bodies.</p>
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