

GENERAL COMMENTS	
Consultation Report	Trialling Report
a. Should be linked to a set of core sustainability requirements	3.7.7 Missing guidance on hydropower in the sustainability context
b. Major condensation and simplification is required	
c. Project proponents cannot be measured on issues outside their sphere of influence	
d. Conflicts with/duplicates other standards, regulation and evaluation processes	
e. Not all aspects are relevant to all projects	
f. Need industry consensus/commitment to use protocol	
g. Purpose and use of the Protocol are not clearly identified	3.3.3 Lack of clarity on assessment purpose and object
	3.7.6 Draft Protocol Introduction - missing guidance on potential users
h. Need to mention non-hydro benefits	
i. Capacity building is needed to use Protocol	
j. Consider a section on dam decommissioning	3.3.5 Not appropriate for addressing decommissioning

1. PRACTICABILITY AND EASE OF USE	
Consultation Report	Trialling Report
1a. Overwhelming and complex	
1b. Difficulty of conducting a robust audit in a realistic timeframe	3.4.1 Too much time required for preparation and assessment
	3.7.5 Missing guidance on length of a typical trial
1c. Need to reduce number of aspects/attributes/sub-attributes	3.4.4 Too many attributes and sub-attributes
	3.4.3 Aspect scoring tables too bulky
1d. Protocol is too focused on large hydropower projects	
1e. Confusing language and terminology	3.1.1 Loose criteria language leading to definition difficulties and subjective scoring
	3.2.1 Language difficulties for non-English speakers
	3.2.4 Inconsistent terminology
1f. Too much redundancy and repetitiveness	3.3.4 Duplications and irrelevant aspects
1g. Inconsistency with industry practice and reality of a project lifecycle	3.3.2 Aspects not adjusted to the relevant project stages
	3.4.8 Project stages defined by Sections I & II are not always consistent with regulatory approaches
1h. Protocol should be goal and outcome oriented	
1i. Stakeholder and consultation requirements too onerous	3.2.3 Too broad a definition of stakeholders
1j. Introduce a test period during which modification to the Protocol may be carried out as a result of ongoing development of the Protocol	
1k. Concern about expertise & training of auditors	3.7.4 Missing guidance on composition of auditing team
	3.2.2 Attribute phrasing as descriptions rather than questions
	3.4.2 Not the most logical ordering of aspects

2. CONTENT - GENERAL	
Consultation Report	Trialling Report
2a. Mixed response on the content: - broad and comprehensive, maybe too much so	3.3.1 Overly comprehensive
2b. Concern about approach and definition of requirements for environmental flows	
2c. Free, Prior and Informed Consent	
2d. Concern about requirements for Consent	
2e. Criticism of weak requirements for resettlement	
2f. Relevance of legal compliance for strategic assessment stage questioned	
2g. Need for greater ecological emphasis	
2h. Demonstrated need should be further elaborated	
2i. Approach to assessing greenhouse gas (GHG) emissions is not meaningful	
2j. Re-think the benefit sharing aspect	
2k. Further attention needed for River Basin and Transboundary Issues	
2l. Food security and livelihoods underrepresented	
	3.3.10 Instream biota and fisheries inadequately emphasised
2m. Institutional capacity assessment of project stakeholders is difficult	
2n. Communications should not be a stand-alone aspect	3.3.6 Stakeholder management and communication not adequately addressed
2o. Issues not addressed in content: - gender issues, traditional governance systems	3.3.9 Gender difficult to assess
2p. Unclear if national legislative documents can be used as examples of supporting evidence	
2q. Include more specific examples of evidence	3.7.9 Aspect-specific guidance notes - Missing guidance on examples of evidence
2r. Provide references to international recognised websites on technical issues	
2s. Protocol should be able to interface with / into existing management systems	
	3.4.5 Need more clarity on conformance and compliance attributes
2t - 2ac. Section I specific comments	
2ad - 2ai. Section II specific comments	
2aj - 2aq. Section III specific comments	
2ar - 2bd. Section IV specific comments	

3. GUIDANCE	
Consultation Report	Trialling Report
3a. Guidance is generally helpful, but desire for it to be more clear, consistent and concise: - not enough; - inconsistent in level of detail; - too lengthy; - not focused enough on goals/outcomes	3.7.10 Aspect-specific guidance notes - target more clearly to auditing needs
3b. Repetition of introduction not necessary	3.7.1 Draft Protocol Introduction - make a separate document
	3.7.2 Draft Protocol Introduction - remove standardised attributes
3c. Need to strengthen guidance in relation to: managing conflicting views; - obtaining input from local communities; - undertaking assessment if regulatory/legal framework is weak; - review of data quality	
3d. Unclear how risks are considered	
3e. Guidance needed on how developers should best engage with stakeholders	3.2.3 Too broad a definition of stakeholders
3f. Need further guidance on measuring consent, stakeholder support and human rights issues, and defining stakeholders	3.1.5 Contestable stakeholder support scores
	3.7.8 Modifications required to stakeholder figure (p.19)
3g. Need for a simplified auditing guidance	3.7.3 Draft Protocol Introduction - missing checklists
3h. Need for practical examples of application	
3i. Need to clarify purpose of guidance notes (educational or auditing tool)	
3j. Exclude issues outside proponent's responsibilities	
3k. Lack of guidance with regards to the necessary level of detail and confidentiality	
3l. Recommendation to base on an international auditing standard (ISO 19011)	
	Uncertainties assessing... 3.6.1 environmental aspects with multiple influences; 3.6.5 projects within a cascade; 3.6.6 refurbishment and redevelopment
	Need more clarity on... 3.6.3 applicability to pump storage; 3.6.4 applicability to small hydro and mini hydro
	3.6.2 Uncertainties assessing Financial Viability and Corporate Governance for Large Companies
	3.6.9 Issues with expectations for public versus private developers

4. SCORING	
Consultation Report	Trialling Report
4a. Scoring seen as highly subjective and qualitative	3.4.6 Too prescriptive to be broadly applicable
4b. Definitions under scoring for current practice are in many cases not adequate	
4c. Scoring system is not uniform or systematic	
4d. Change the number of scoring levels	
4e. Large leap in criteria between scores seen as problematic	
4f. Scoring masking low performance	
4g. Change Section I scoring to a Yes/No format	
4h. Problem of replicability of results from different auditors	
4i. Make scoring meaningful for financial institutions	
4j. Unclear how to score non-relevant aspects	
4k. No numeric incentive for high performance	
4l. Scoring for stakeholder engagement needs revising	
4m. Consensus on scoring established before undertaking assessment	

5. PRESENTATION OF RESULTS	
Consultation Report	Trialling Report
5a. Content of auditor report should include recommendations for improvement	
5b. Suggestions for improving the presentation of results	
5c. Mixed view about determining a final grade	
5d. Need consistent methodology for reporting results	3.8.2 Need for consistent approaches to presentation of results
	3.8.1 Limited usage of the auditor's worksheet

6. BASIC GOOD PRACTICE	
Consultation Report	Trialling Report
6a. Clear definitions and examples of basic good practice required	3.1.4 Too many definitions of scores 3 and 5
6b. Confusion about how basic good practice corresponds to national laws and regulations	3.1.2 Superceding more or less refined national regulations
	3.6.8 Issues with consistency with national legislation and policies in different countries
6c. Concern about consistency of good practice standard between countries	3.6.7 Issues with comparability of scores under different regulatory environments in developed and developing countries
6d. Concern about good practice not being good enough	
6e. Suggestions for basic good practice	

7. PROVEN BEST PRACTICE	
Consultation Report	Trialling Report
7a. Clear definitions and examples of proven best practice are required	3.1.4 Too many defintions of scores 3 and 5
7b. Suggestion to evaluate proven best practice from a process and product standpoint	
7c. Difficulty of achieving best practice	
7d. Scores of 4 and 5 don't represent international best practice	3.1.3 Superceding of international standards
7e. Suggestions for criteria for proven best practice: – corresponds to internationally recognised practices and standards; - no non-conformances or non-compliances; - no opportunities for improvement at time of audit	