Feedback Type/Area	Feedback Received	How to Address
Section 4 - Declaration, Disclosure, & Reporting	- It says that assets must show either a commitment or demonstration of adherence to the baseline criteria and demonstrable or anticipated significant contribution to one or more of the criteria. At what point will they need to evidence that this commitment has resulted in action or that this anticipated contribution has been achieved? For example, if a pre-operational asset forecasts a much better impact than when it is operational, does it lose its SI label? And in terms of the 'commitment' to baseline criteria - how long do they have to complete all the required reporting before losing their label.	Further details included in Section 4 of SI Framework noting evidence required and associated levels of reporting for pre-operational and operational assets.

Information on whether SI Label can be withdrawn provided in FAQ document. |
General	- No mention of Paris Agreement in the framework; strongly recommend making reference to it and including it among baseline standards to be reached.	- Made reference to Paris Agreement in Framework document Section 2.
General	- Comments on the following: (i) further developing the analysis and quantification of the infrastructure's contribution to SDGs and (ii) allowing to meet higher benchmark of positive impact on people (through contribution to infrastructure's end users and wider economy) and planet (through deployment of innovative climate solutions) - will further enhance the relevance and benefits of the label in emerging and developing markets. Infrastructure assets in developing and emerging markets do not replace existing and high emitting infrastructure but are part of the wider sustainable socio-economic development of these countries. Where infrastructure assets deliver both socio-economic development in a country that lags on SDGs and does so by meeting international criteria of environmental sustainability and health and safety, this additional value should be captured and made recognizable to the market. We therefore propose an enhanced Sustainable Development Impact badge/label for sustainable infrastructure that specifically contributes to SDGs where the needs are greatest. This would be particularly useful when considering the need for blended finance in infrastructure investment in developing and emerging markets.	Well-noted on importance of label scoring/banding. While external review remains highly encouraged, such considerations (particularly alignment to SDGs) would be useful benchmarks.
General	- The SI Label is missing an emphasis on the early phase, which is most critical for projects to be considered 'sustainable'. We request to be included in a new dimension/ criteria/ requirement focused on demonstrating that the project is best suited/least impactful regarding energy, water delivery, transportation etc., though the emphasis on monitoring (pre-and after monitoring) importance is greatly welcome.	
General	- Planning/ development of a sustainable asset must ensure that the indicators for the newly proposed infrastructure take into account a high degree of avoidance of the intersection of the national ecological network (protected natural areas, wilderness areas, ecological corridors).	Emphasis of SI Label's importance at the earliest phase of the infrastructure lifecycle included in the SI Framework.
General	- Labelling itself does not consider the socio-environmental impact of specific infrastructures on the land. The sheer existence of environmental impact assessments is not sufficient to assess the impacts, due to issues related to the quality of the assessments, which demand governmental and legislative engagement in order to assure that these instruments will be robust and therefore useful to the approach proposed by the Label. CPI Brazil has studies that provide input about this matter (https://www.climatepolicyinitiative.org/the-topics/infrastructure/).	Well-noted resource, thank you.
IFC PS Annex	- The "IFC Performance Standard" section does not contain details for the governance section.	Removed the IFC Performance Standards Annex
Governance & Reporting	- In the Developed World where there are high thresholds with respect to legal, planning and licensing requirements that need to be met by a project, consideration should be given to how to streamline some of these requirements to avoid unnecessary cost or duplication that could make adoption of the Label unattractive to sponsors. A clear and detailed example scope of work for each report would be helpful to enable sponsors to understand where there are additional requirements over and above current expected due diligence required by the market.

More detail on requirements of the ESMS would be helpful. | Additional guidance included on ESMS integrated into the SI Framework. Well-noted on the importance of detailed scopes of work for such reporting to be of high quality. |
| General | - The standard is missing an emphasis on the Early Stage/Upstream Planning phase, which is most critical for projects to be considered 'sustainable'. | Included reference to importance of early stage/upstream in the SI Framework. |
| Asset List | In Annex1, in the category of "Green Buildings & Social Infrastructure", can we include the facilities that have been set up using green technologies and construction methods within the industrial sector? There is a need to make our manufacturing facilities climate resilient so that we can secure green jobs for the future generation. Under the very same category of "Renewable Energy", could we rename it to "Renewable Energy, Energy Efficiency and Environmentally Sound Technologies" so that they are more encompassing of the infrastructure that are set up within cities and existing urban hotspots. | The Asset list provides an indicative list of assets that could be referenced, but it remains non-exhaustive (and does not connote automatic qualification). Facilities using green technologies could be considered, provided sufficient rationale is offered. |

Governance & Reporting	- External review should be required; without it , it may create room for lack of uniformity and assurance in reporting, which is currently a challenge. Therefore, there is need to have in place mechanisms to maintain integrity in the absence of independent external review being a requirements.	Approach draws on Green Bond Principle justifications, which similarly do not require external review. More details are provided in the FAQ, including guidance for External Review, should it be persued.
Governance & Reporting	- Label should be re-evaluated annually.	Noted
Governance & Reporting	- To safeguard the robustness of the label, close follow-up of the quality of self-declarations should be done post-launch of the SI Label (for example, through a quality audit of the self-declarations submitted during the first 12 months and presented to the Executive Committee). In case of quality issues, consideration should be given to turning the independent external review into a mandatory aspect of the SI Label.	Noted, scope to consider once Secretariat is established.
Governance & Reporting	- Label should be re-evaluated every two years.	Pre-operational, it's as applicable (don't need to disclose the same data every time); if asset is operational and hasn't changed in performance, light reporting req. Deferring to GBP annual reporting method (articulated in FAQ).
Governance & Reporting	- Label should be re-evaluated annually.	Noted
General	- Possible impediments to the success of the Label for investors from the EU investing in LIC - due to capital weighting requirements. Will the team also undertake some capacity building amongst finance regulators and the financial community to explore if the label could result in investment capital weighting requirements being adjusted?	Included broad reference to capacity-building as part of role of the Secretariat; form of assistance can be explored once Secretariat identified.
Governance & Reporting	- Will there be a tiered approach for data i.e. in the absence of available data could a conservative estimate be applied?	Noted, to be considered by Data Reporting Platform.
Governance & Reporting	- Self-declaration and reporting does not provide required level of confidence on reported data. There is high risk of green/SDG washing in the market as the ESG market has revealed. Hence, external review should be mandatory to make SI label fully credible.	Noted
Governance & Reporting	- Not entirely clear what would be subject to simple declaration / disclosure by management / Sponsors, and what may be subject to external validation. We believe a materiality test should be added to the various criteria, and to apply the relevant upfront declaration / disclosure, ongoing reporting or external validation based on this risk element.	Added a catch-all comment that materiality should be considered when you're looking at reporting / alignment with minimum safeguards and external review.
Governance & Reporting	- Review of label should be done every two years (given amount of reporting and due diligence required).	Noted, frequency and level of reporting amended in SI Framework to be provided as required based on material changes to the asset.
General	- Doubts on whether this should be a single label (e.g., 'green', 'yellow', 'red'). Suggestion on one page report detailing how the project was ranked as sustainable instead.	Thank you for the suggestion.
Governance & Reporting	- Suggest annual reporting for the construction/pre-construction phase; for the operational assets, we suggest review every five years.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Label should be re-examined annually and self-declaration without required external review doesn't provide adequate level of transparency.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Label should be re-evaluated annually. External review should be required.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.

General	- Additional resources are necessary in order to apply the Fast-Infra label. Assets in developed countries would be the main beneficiaries, as for now. However, if Fast-Infra could support developing countries with initial financial and technical resources, developing countries once initiated their participation in the labeling scheme, would be able to mobilize additional financial and technical resources for future projects.	Tech-enabled platform looking to fill knowledge gaps in terms of structuring transactions; could be leveraged when considering SI Label declaration. Secretariat can also provide education to market of benefits of Label, how to declare/report; they could provide this function. Also in EMs, DFIs and other MDBs could tap into TA facilities. Secretariat can coordinate with them (drawing on potential membership of secretariat).
General	- The framework would benefit from integrating guidelines for creating or strengthening enabling conditions. It should not be only about checking boxes but mainstreaming sustainability throughout sectors and different levels. This can only be achieved by providing technical and financial support to governments and other stakeholders to strengthen their structures, regulations, procurement processes, and capacities.	Noted; added language around building capacity as a potential area of focus for the Secretariat.
Governance & Reporting	- To have higher credibility, third party verifications should be mandatory for those wanting to keep the label.	Noted.
Governance & Reporting	- Reporting every year is too short to report on changes. The label should adopt at least a two years period for reporting.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Does not agree that self-declaration with independent external review highly encouraged, but not required, would be sufficient. External audit or independent external review will add quality to governance and reporting. It should be definitely encouraged. However, the specific methodology applied for reporting on a particular asset or portfolio of assets should be reviewed and approved by the Secretariat. - Recipients of SI Label should be reviewed annually and every two years.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
IFC PS Annex	- We are not quite sure what this section is providing - we believe it is a summary of the IFC PS requirements and which label they sit under? If this is the case there are considerable sections of PS missing so this should be carefully reviewed to ensure nothing is missed.	Removed this annex to avoid confusion and reiterate in framework to ensure compliance.
Governance & Reporting	- Does not agree that meeting full baseline and at least one positive contribution factor is enough. - There is a need to differentiate minimum SI vs additional positive contribution (more than one dimension). Suggestions are made above about ways to differentiate based on SDG contribution and relevance as well as expected direct impact on people and planet and wider economy.	Noted, baseline is designed to be robust and demonstrate sustainability above minimum safeguards. It is encouraged to show adherence to more that one criterion.
Governance & Reporting	- Believes that current approach to self-declaration is sufficient, with review done every two years for SI Label recipients.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Agrees that current approach of meeting full baseline requirement and one positive contribution is sufficient. - Disagree with self-declaration process. - Believe label should be reviewed every five years.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Agree with approach of meeting full baseline and at least one positive contribution. - Agree with proposed approach to declaration, disclosure, and reporting and approach to self-declaration. - SI Label review should happen every five years.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Agree with approach of meeting full baseline and at least one positive contribution. - Agree with self-declaration approach. - SI label review should happen every two years.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.

Governance & Reporting	- Agree with approach of meeting full baseline and at least one positive contribution. - Doesn't agree with self-declaration approach. - SI Label review should happen annually.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Agree with approach of meeting full baseline and at least one positive contribution. - Agree with self-declaration approach, however, over time and to increase robustness of reported data, encouragement of independent data verification by third parties. - SI Label review should happen annually.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Agree with approach of meeting full baseline and at least one positive contribution. - Agree with self-declaration approach. - SI Label review should happen every five years.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Agree with approach of meeting full baseline and at least one positive contribution. - Agree with self-declaration approach. - SI Label review should happen every two years. - We believe that data availability and transparency, at the aggregate level at least, is important and would be beneficial to the sustainable infrastructure agenda.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance. Data Platform will offer transparency to SI Label reporting and disclosure.
Governance & Reporting	- Doesn't agree with approach of only meeting one positive contribution. - Agree with self-declaration approach. - SI Label review should happen every two years (to ensure that re-examination is an enabling, and not prohibitive, cost).	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
General	-In Europe financing of greenfield infrastructure is a largely bank led market, with large amounts of liquidity available for well structured projects with a strong business case. It is difficult to see how the Label will increase that liquidity. Whilst the Label may help banks internal requirements around ESG reporting or CRR501a assessments, it is unlikely to impact decision making or pricing. If this is the case it may be difficult to persuade sponsors to adopt the label given inevitable cost or 'hassle' of additional requirements.	Noted
Governance & Reporting	- Agree with meeting all baseline requirements and at least one positive contribution criteria. - SI Label review should happen every two years.	Frequency of reporting adjusted in framework (pre-operational might not require annual reporting if there are no material changes); operational assets within 3 years of operational performance.
Governance & Reporting	- Doesn't agree with self-declaration approach: Existing standards for labelled sustainability products are moving towards making an external review mandatory. We are hence not sure if providing an explanation of why an external review has not be carried out will be sufficiently robust for the European market. It is also not clear if the role of the external review is to opine on alignment with the SI label, or to validate accuracy of information reported.	External Review is highly encouraged and is in line with best practice (similar to Green Bond Principles).
Governance & Reporting	- Further clarifications regarding the inspection of the accuracy of declaration, disclosure, and reporting processes are needed. - Agree with self-declaration approach; however independent external review should be in place down the road to encourage adequate self-declaration. - SI Label review should happen annually.	Noted
Governance & Reporting	- Reporting approach is clear but disagrees with self-declaration without external review. - FAST-Infra SI Label should be re-examined annually.	Noted
Governance & Reporting	- Agree with self-declaration approach and adherence to all baseline and at least one positive contribution criteria. - SI Label review should happen every two years.	Noted

Governance & Reporting	- Agree with meeting all baseline requirements and at least one positive contribution criteria. - SI Label review should happen every two years. - Does not agree with self-declaration approach: Based on where the market is at this stage e.g. expectation of third party verification of green bonds, verification should be a requirement. Given the level of scrutiny by stakeholders and risk of greenwashing not including mandatory verification elevates the risk of examples of poor application of the label tarnishing the initiative. Involvement of a third party would also ideally help to provide a greater level of robustness in the open ended criteria of positive impact for each category (i.e. in the absence of mandatory technical thresholds).	Noted, reporting requirements further detailed in SI Framework.
General	- No other FAQ have currently been noted. One separate point for consideration- In light of the broad range of frameworks infrastructure assets can adopt/align to satisfy the Fast-Infra requirements it us understandable that no prescribed reporting template is required. It may be worth considering issuing a sample template nonetheless to provide an off the shelf solution for reporting, particularly where it relates to the rational on compliance with the minimum environmental and social safeguards, and 14 baseline requirements, to "channel" the formats likely to proliferate and enable a greater level of comparability. This may also help in the subsequent input into the data platform.	Something to discuss with Secretariat once they come on board.
General	- It is a framework, but somehow it doesn't seem to be raising the bar. How can it be more ambitious?	Included language on raising level of ambition.
Governance & Reporting	- Does not believe that self-declaration process is sufficient and that external independent review should be required. - SI Label should be reviewed every two years.	Noted, details on frequency and level of reporting for operational and pre-operational assets included in the revised SI Framework.
Asset List	- Need to expand on the nature based assets aspects. NBAs are not recognized for their ecosystem services in financial terms. They should also be the SI asset type where we want to see greater investment. Therefore there is the opportunity to enable this through the FAST requirements.	Asset list is indicative and covers NBA/NBS. No action.
Asset List	- Parking can be conceived as a hub for smart and sustainable mobility and should be added to the 'Clean Transport' asset description.	Parking would be covered under 'infrastructure' for clean energy vehicles. No action.
General	- Lay out commercial and reputation benefits of SI Label more clearly.	Added to FAQ
Asset List	- Renewable energy: EFW preferable to gas? Gas fired with CCS - Clean transport: Addition of hydrogen; what is "active transportation"? Why is dry ports listed?	Renewable energy: Unabated consumption of gas for energy generation would not be expected to meet the baseline requirements for climate mitigation. EfW that meets these baseline requirements and demonstrates improvement in the use of natural resources could achieve the label requirements. Clean transport: hydrogen added. Removed active transport and dry ports.
Asset List	- Waste-to-energy projects have not been included in the EU taxonomy.	Noted - the SI Label is intentionally broader than the EU Taxonomy, nevertheless allowing a label self-declaration to demonstrate alignment to standards and taxonomies as applicable.
Asset List	- Renewable energy technologies seems inconsistent e.g. 5MW cap on hydropower (meaning in practice only run-of-river projects) but no restrictions on geothermal, bio-energy, waste to energy projects which also have potential negative impacts. Will further guidance be included on these projects to ensure potential negative impacts are avoided? This would be in line with e.g. CBI taxonomy or EU taxonomy - Mini-grids should be renewable energy based mini-grids? - Electrical transmission: could provide linkage to PIDG/CDC & Others - Electrical transmission best practice guidance - Road safety design and construction should include a recommendation to adopt IRAP three (3) star of Better and provide linkage to PIDG/CDC Road Safety best practice guidance - Building Infrastructure design should include a recommendation to align IFC Edge	Renewables: Suggest we remove the <5MW cap. If it is a large hydropower project then there is still that requirement to demonstrate meeting criteria. Mini-grids: Added "renewable" to mini-grids / distributed systems Road safety: there is no reference to road safety design in asset list. No action.

Asset List	- Green Infrastructure is de facto completely missing except the call for nature-based solutions. So, we believe that part of the table should be renamed to Nature-based solutions and Green Infrastructure. And bullet point "Maintaining a sufficient degree of permeability of the landscape for relevant animal groups" should be added. - Necessary that this SI label strengthens and promotes laws, policies and principles that successfully protect rivers. - Renewable Energy section - we request to exclude from the Indicative & non - exhaustive list of sustainable infrastructure assets the phrase that allows small hydropower - "hydro (<5MW)" to be part of the sustainable assets. It is known that dams and reservoirs are the leading contributors to connectivity loss in rivers around the world – and the subsequent loss of the diverse range of benefits that healthy rivers provide for people and nature. The world's climate and energy targets can be met by exploring alternative development options, like solar and wind (e.g. motorways can be used for solar energy production.), and is not necessarily the fragmentation of the rivers.	Green infrastructure is a common term for infrastructure that has a positive environmental benefit, not limited to nature based solutions. Biodiversity impact is covered under the relevant criteria. Managing pollution to rivers is captured within the baseline requirements for "Embedding pollution prevention and control". Hydro: a project that has a significant negative effect on a river and its dependent ecosystem would not qualify for the label. No action required.
General	- The framework tends to use European benchmarks and taxonomies and these may very well not be the base in a developing market. The framework needs to enable and increase the deployment of sustainable infrastructure in developing markets - and it should not lock these markets out of the sustainable infrastructure label due to the criteria imposed or the cost of compliance.	The standards and taxonomies referenced are for guidance purposes. The label allows flexibility to the user to select the appropriate method and KPIs to demonstrate meeting the baseline criteria and positive contributions. Added "energy efficiency measures" under buildings and social infrastructure.
Asset List	- Criteria did not seem to feature energy efficiency and we are seeing some activity with refrigeration, HVAC and manufacturing equipment which may also be relevant	
General	- How can an institution reconcile between their organizational ESG policies and their asset (invested/developed/loaned)'s sustainability performance? Is the infrastructure asset's label independent from the participating organization's performance? - Another related question, if the asset can be certified under the SuRe Standard, would it also be incentivized to get this SI Label? Why would they go for another one?	An organization's policies should inform their assets' performance but the evaluation undertaken to demonstrate meeting the SI Label requirements would be independent for the organization's performance.
Governance & Reporting	- There will be pushback because of additional cost, risk of green washing, patchy capabilities and also the question of how does this Label recognize, align with the likes of SuRE, Envision etc. Therefore adopting a joined up approach with other SI standard setters and facilitators would seem logical and create a collegiate environment increasing the likelihood of success.	Noted
General	- SI Label may need to introduce grading system to take into account maturity of projects/clients.	Noted
General	- Label should strongly build on the IFC PS.	Noted
Governance & Reporting	- How often will the label be updated? Who will be responsible for this?	Included as part of role for Secretariat (please refer to Governance Framework).
General	- Need to ensure broad market acceptance (across Sponsors, lenders, regulators, etc.) to ensure level-playing field. We are concerned that the proposed scope of the label will make it unpalatable to many market-oriented players vs. multilateral and national development agencies who may not have this concern.	Noted, ensuring broad market acceptance through targeted stakeholder outreach
Governance & Reporting	- Self-declaration with encouragement for external review is sufficient.	Noted
Governance & Reporting	- Disclosure requirement of scoring (e.g., GRESB results are publicly available, this could be a useful model).	Noted, scope to include scoring as part of external review.
General	- For Fast-Infra to truly become a flagship framework and labeling scheme, it should integrate guidelines for implementing measures to help achieve higher sustainability levels. The focus should not be on the labeling scheme but on creating enabling conditions, strengthening institutional structures, building capacities, and raising awareness.	Noted, thank you for the suggestion.
General	- Attention should be given to ensuring the list of projects/metrics remains up to date with latest technological developments.	Noted, the criteria/dimensions table will evolve over time to reflect market best practice.
General	- It is important that the standard is universally agreed and applied - there should not be a difference between developed and emerging countries otherwise this will create issues for investors/lenders as it could create a two tier infra market	Noted.
Governance & Reporting	The External Review appears to be optional. It will be difficult to have this be a credible label without a 3rd party verification/external review process.	Noted; it is considered market best practice to have third party verification/external review.

General	- As noted in the response to Question 4, there are several requests for clarifications, and we have listed gaps in the criteria descriptions that are, in fact, already articulated in the IFC PS', but they are so important that we recommend elevating them to the text in the criteria document, including Indigenous peoples and free prior informed consent (FPIC) and Key Biodiversity Areas (KBAs). In this regard it would be good to note that the IFC PC baseline also includes the IFC PS Guidance Notes. This goes without saying, but it would be useful to cite that, as some important details are contained there that are not mentioned in the main PS document.	FPIC and KBAs included in criteria/dimensions, along with reference to IFC PS Guidance Notes as an additional resource.
General	- SI Label (framework, criteria, reporting) should be relative to stage, asset type, capital value, etc.	Added
Section 3 - Minimum Safeguards	- Clarify if or to what extent potential past liabilities will be expected to be reviewed in the process of SI labelling (e.g. material non-compliance during pre-construction stage or during construction) - Potential challenges in applying label to brownfield projects (esp. older assets) for those assets without ESIA docs.	NOTED: projects must meet baseline requirements and, MINIMUM SAFEGUARDS & RISK MANAGEMENT requirements, also note there should be a Sustainability Mitigation & Action Plan, which includes, but is not limited to, actions and mitigation recommended from the ESIA, Climate Risk and Resilience Assessment, and any agreements from the Stakeholder Engagement Programme. This is where 'liabilities can be listed and actions taken. Asset without ESIA are considered to be in a significant minority - however notwithstanding SI Label private investors will conduct due diligence to similar global standards so SI Label requirements will be aligned in those cases.
General	- Potential to incorporate CBA on tangible and non-tangible benefits of not achieving criteria to demonstrate financial benefits of fulfilling criteria	Noted. Label should support such Cost Benefit Analysis
Section 3 - Minimum Safeguards	- Requirements listed would be excessive for a brownfield asset. Also for some greenfield projects in DM (e.g. solar PV in the US). - ESIA would work for greenfield assets mainly. Unlikely to work for Sponsors for operational assets - Question on ESMS and Sustainability Mitigation & Action Plan being subject to external review – if possible to certify cover ratios but not environmental compliance?	Noted: however Framework states: If documentation required above is not available (e.g. due to the stage of project development), the infrastructure asset, its owner, and /or its financiers shall: i) conduct an equivalent assessments; ii) publicly state why no such documentation is available; or iii) otherwise set out plans for future provision of such documentation. This should be to the satisfaction of the external independent reviewer, where used.
Section 4 - Declaration, Disclosure, & Reporting	- Annual impact reporting – unlikely that sponsors of DM projects would agree to do this.	Noted: changed from 'shall' to 'should' however is a requirement of revised Green Bond Principles, June 2021. https://www.icmagroup.org/assets/documents/Sustainable-finance/2021-updates/Green-Bond-Principles-June-2021-140621.pdf
Governance & Reporting	- Requiring extensive due diligence and reporting for a small project in an emerging market may discourage the Sponsors from seeking the SI label. If the relevant risk (to the investors / lenders / community) related to a specific criterion is low, then there should not be a need for extensive due diligence / reporting. A more straightforward disclosure element should be sufficient, with more work to be done on the core of the project (such as environmental aspects for a renewable energy project).	Noted - however the SI does not require extensive DD if anything DD requirements for investors should be lower due to the transparent / disclosure. However the materiality aspects have been added to the Framework.
Section 2 - Sustainability Dimensions, Criteria, & Measurement	- Current draft focuses much more on the benefits that the project creates rather than on aspects such as resilience. It also assumes that there's a baseline that every project needs to meet - suggestion to detail what the baseline is and how it helps to manage risks associated with the investment.	Baseline requirements are set out in the Criteria document.

General	- A related overall comment is that while the framework applies to emerging and developing markets, the guidance is broadly centered on EU and international standards that are not broadly followed in these markets. more tailored guidance to emerging and developing markets would be beneficial. value created by the infrastructure - especially in emerging developing countries. 1. Contribution to SDGs - the framework mentions alignment to SDGs but this is not followed up in the criteria. In our view and experience, it is both feasible and useful to track contribution to SDGs rather than alignment. We have developed a simple methodology based on published data on country progress on each SDG which allows us to (i) assess the relevance of each investment in the context of country SDG progress - so infrastructure that contributes to SDGs for which progress is lagging in Country is assessed as more relevant to SDG progress; and (ii) quantify the contribution based on agreed indicators which are publicly track-able. 2. Positive contribution to infrastructure end users Positive contribution is generally constrained in the framework by being set on the IFC PS standards. It would benefit from being broadened, possibly as a stand alone category to consider - at least - (i) positive impact on people - in terms of scale and depth of impact and - possibly - (ii) positive impact on wider economy. In this way the label would be able to capture and distinguish infrastructure that has direct positive impact on people in terms of quality of life, health, jobs - in economies that lag behind on socio-economic development and provide market signals to investors with an interest in these areas. We've developed a proprietary methodology based on best practice in impact investing from the Impact Management Project and IFC Operating Principles for Impact Management as well as latest research on Impact Weighted Accounting - following the categories of impact on people, planet and wider economy. In this way we are able to assign a premium "positive impact" label based on direct impact on end users (how many - or scale of impact; and what changes for them - or depth of impact), as well as indirect benefits from the impact of the infrastructure on the wider economy (through local contracts and productivity gains).	Noted - there is some local interpretation / flexibility designed in however certainly for a later version of the SI Label once it has been more widely applied. Reference 'Impact Management Project' and 'IFC OPIM' as an alternative methodology for measurement. Added to criteria document Include reference to broader / holistic positive contribution for people and wider economy. This may be a reference in the doc to inviting narrative reporting. Added to Criteria document and referenced in Framework Offer to work with other entities in next iteration of Framework and Criteria as part of an advisory committee / Secretariat.
General	This differentiation is particularly needed considering that to plug the infrastructure gap in developing countries, blended finance models will be necessary that involve capital with	
Section 3 - Minimum Safeguards	- Minimum Safeguards & Risk Management: "Publish in the public domain an Environmental and Social Impact Assessment (ESIA) produced by a qualified independent firm or consultant;" - they need to make public who has realized & and who paid for the ESIA and also demonstrate that the process was independent, correctly done, without conflict of interest.	The EISA document would typically include all these details. The need to be independent is clearly stated already.
Section 4 - Declaration, Disclosure, & Reporting	- The "declaration, disclosure, and reporting" section of the framework provides a skeleton of the voluntary requirements. However, it does not disclose specific details on i) the submission process, ii) who will perform the review process, iii) Disclosure requirements to the public, iv) what are the qualifications to be an "Independent External Review" company, and v) what defines a "significant positive contribution to one or more of the sustainability objectives." It would be helpful if the framework had a Q&A section that provides more details for end-users of the SI label.	Add to the FAQ
Section 4 - Declaration, Disclosure, & Reporting	- Section 4 references that the "owner and/ or financier of the infrastructure asset shall publish…" Who the responsibility sits with should be clarified. Given that it is "and/or" can financiers opt not to do this? Is there a threshold for when this is applicable e.g. in the context of smaller credit holdings?	Removed 'and' added materiality
Section 5 - Independent External Review	- There appears to be an inconsistency of wording when referring to external verification. Section 5 makes it clear that external verification, however the last paragraph of section 3 suggests that external review is required for ESMS and the Sustainability Mitigation & action plan. For clarity the terminology regarding the positive contribution should also be made consistent. The Fast-Infra introduction, and section 4 refer to "significant positive contributions" whereas section 2 only refers to "positive" contribution.	Have updated text for consistency for significant
Section 3 - Minimum Safeguards	- "In the public domain an Environmental and Social Impact Assessment (ESIA) produced by a qualified independent firm or consultant"; → they need to clarify who paid for the ESIA and how they made sure the process was independent to make sure there is no conflict of interest. - Environmental and Social Management System (ESMS) should be in place pre-operation and during operation stage and should be integrated with disclosure/reporting on impacts.	Additional guidance added to Section 3 on ESIA and ESMS good practice.
Section 3 - Minimum Safeguards	- Unclear why IFC PS/EP4 as listed as "additional" when main framework notes that adherence to IFC PS/EP4 are required.	Slight amendment to language in section 3, though language is clear that this is a requirement.

Section 4 - Declaration, Disclosure, & Reporting	- In order to re-affirm alignment, a thorough re-examination would provide comfort that an asset has been thoroughly considered, particularly given that the labels allow for self-declaration, with no requirement of external review (although advised).	Slight amendment to language in section 4 on need to re-examine alignment.
Governance & Reporting	- The data platform for this will be key to ensure that the SI label helps to limit greenwashing rather than contributing to it. It would also be useful if there was a clear way to 'flag' assets in receipt of a Fast-Infra SI label who do not appear to be reporting sufficiently. - It would be useful to clarify if there will be a minimum requirement to declaration, disclosure and reporting on a common platform.	Added section to Governance Document providing information on the data reporting platform.
Governance & Reporting	- While noted that the choice of developing a label that is not banded, shaded or graded, we strongly believe that the reality of developing countries requires a way to value the "impact premium" that sustainable infrastructure can provide in these countries and we are therefore interested in discussing the option to develop a SI+ or SDI (Sustainable Development Impact) infrastructure framework / label, to complement the currently proposed framework and label.	In section 4, noted that reporting should be done on the Data Reporting Platform referenced in Annex 3.
General	- We would recommend using terminology which already exists when talking about positive impact.	See reference re Impact Management Project and IFC OPIM above. Added reference of these to the Criteria doc]
Section 2 - Sustainability Dimensions, Criteria, & Measurement	As noted in the FAST guidance, "At the stage of the asset lifecycle when the SI Label is applied, and throughout the rest of its lifecycle, the infrastructure asset shall demonstrate adherence to the following baseline requirements, or for each requirement, application of local and/or national law, whichever is the more stringent: • IFC Performance Standards on Environmental and Social Sustainability (IFC Performance Standards), 2012,"…, it should also specifically include the International Finance Corporation's Guidance Notes: Performance Standards on Environmental and Social Sustainability of 2012], as thy include details on certain important topics, such as KBAs and FPIC.	Added to Section 2 as a footnote to the mention of IFC performance standards.

Feedback Type/Area	Feedback Received	How to Address
Health & Safety	- Baseline is too vague as it relates to inclusion of health and safety. 'Safe by design' practices should be included. - More indicators/metrics needed.	Should consider referencing to World Bank Group Environmental, Health, and Safety Guidelines (the "EHS Guidelines" https://www.ifc.org/wps/wcm/connect/29f5137d-6e17-4660-b1f9-02bf561935e5/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES&CVID=jOWim3p) ?
Governance Dimension	- Dimension does not appear to cover all aspects included under the "Institutional Sustainability" dimension of the 2019 IDB SI Framework, in particular "alignment with global and national strategies". Is this dimension reflected elsewhere in the Label? (It is well noted that the Common Set of Aligned Sustainable Infrastructure Indicators published under MDB ICP in Sept. 2020 is also not covering all IDB "Institutional Sustainability" dimensions).	Governance Dimension is at asset level. Certain aspects of the Institutional Sustainability (IDB Framework) refers to public sector's capacity which would be beyond the asset's realm.
Transparency & Accountability Policies & Procedures	- To make this criteria operational it is important to define how this will be assessed because it seems to rely on self reporting.	See SI Framework document for details on assessment process.
Health & Safety	- Baseline: Given the labour intensive nature of infrastructure (notably construction phase), it would make sense to add a mention of H&S standard for labour / workers as well.	Covered in baseline criteria; also part of environmental & social requirements as part of minimum safeguards (section 3 of SI Framework)
Government Policies for Project Fiscal Transparency	- Baseline: Can be done at project level, but frankly this is one for the relevant government entity to disclose, otherwise limited impact expected.	Addressed in criteria table; provided more details on reporting/disclosure requirements.
Health & Safety	- Amendment from 'number of accidents' to an indicator comparable such as Accident Frequency Rate (AFR) as otherwise large projects/operations won't be able to be compared with smaller ones or those in a different sector.	Example indicators are included as guidance; welcomet to use additional metrics, such as AFR, as applicable.
Anticorruption Policies & Procedures	- Would be helpful to include minimum standards of the policies that are being asked for, rather than just asking for evidence that they have one. This could follow the criteria that Sustainalytics use to assess organizations. For example, for an ethics policy this could include asking for evidence of ethical risk assessments, evidence of employee training, evidence of a procedure for investigating incidents and corrective actions, or similar. This would also help to show that the policy is actually embedded into the organization.	HM to provide reference to ISO standard.
Governance Dimension	- Nothing in criteria focused on adequacy of the board around transparency, diversity, experience, or similar. This could be its own criteria or embedded into one of the others (potentially around transparency).	Looking to evolve the criteria over time, this is a facet that can be considered for the next iteration of the criteria/dimensions.
Governance Dimension	- Make clear who needs to have the required policies in place, particularly when there are likely to be a number of different orgs. Operating in different capacities.	At the SPV level, it will be informed by which entity/entities own the asset (project co). HM to add some additional detail.
Government Policies for Project Fiscal Transparency	- Is this relevant for all assets, and if not, what would happen for the assets where this doesn't apply. (comply or explain approach)?	Addressed in baseline criteria with additional language.
Governance Dimension	- Include a criterion on financial sustainability, or a new dimension on economic and financial sustainability.	- Financial institutions are good at determining the financial case and not determining the sustainability case; inclined to reject.
Governance Dimension	- Positive contributions should be elaborated, especially regarding good practices in transparency, and anti-corruption measures should be praised. There should be an explicit criterion for disclosure and the need to make all information publicly available to ensure full transparency.	SI Framework provides scope to provide additional positive contribution beyond what is listed in the criteria/dimensions.

Health & Safety	- Health and safety are within social and should really be pulled out as its own section and include both workers and public and community health and safety. A ref or link to PIDG live saving rules and a commitment to adopt or similar on all projects to be included. - Should cover workers health and safety as well as public and community. It should include the requirement for scoring on a robust contractor management and selection process. It should also include risk based assessment and setting out commitment to life saving rules (for example the PIDG life saving rules Life-Saving-Rules-A6-booklet.pdf (pidg.org)	Example methodology and indicators are included as good guidance, other references can be used as well.
Governance Dimension	- Needs to strengthen ESG/HSES leadership (and safety as a central value) including requirement for HSES committees and HSES involvement at board level - not just policy and process. - Serious incident reporting and investigation - There should be a requirement to classify and report all serious incidents as a baseline. Along with incident review and sharing of learning lesson learnt. This could sit in HSES governance with reporting line up to board.	Included as part of minimum safeguards section (level of reporting is part of governance of health & safety requirements included as minimum safeguards).
Governance Dimension	- We believe stakeholders (like NGOs etc.) in perfect cases should be involved when all options are still open, if possible from the early phase, and engagement should continue throughout all processes. - criteria on corruption, some indicators need to be added.	Covered in amended governance dimension criteria.
Governance Dimension	- Will geo-political and political risk be addressed in this label, under the governance criteria?	Outside of scope of criteria, but this type of due diligence will be part of investment due diligence.
General	- The criteria appear more than adequate. However the thresholds set need to enable the flow of funds to developing markets, and not inhibit it. - The criteria seemed largely clear. However, implementing them on an actual project may not be so easy once you get into the detail. - These dimensions should take into consideration the nuances of a developing market; and local concerns such as the inclusion of minorities - whether this is on race/gender/religion/sexuality. It should be an inclusive approach that recognises the local environment.	Noted on implementation. Other concerns on criteria (e.g., inclusion of minorities) included in dimensions/criteria table.
Governance Dimension	•‌Under Governance criteria on corruption, which is missing a methodology, perhaps the USAID-funded Targeting Natural Resource Corruption (TNRC) project could provide some example methods/indicators for the corruption section? https://www.worldwildlife.org/pages/tnrc-targeting-natural-resource-corruption •‌Annex [3] governance: Need to add the institutional framework for asset management, maintenance and measurement impact post-construction. To ensure the asset function works.	TNRC methodology can be used if/as applicable to specific biodiversity projects. Noted on governance piece - this is a factor that will be further clarified once entity/consortia are selected for Secretariat function.
General	- Potential that criteria offers 'easy win' with only one positive contribution factor required; grading system could be helpful.	Could say that contribution to more than one will signal enhanced performance (and is highly encouraged). Data repository will also enable this comparison and those who are going above and beyond…could talk to Superunion on how to show how we can show this ambition.
General	- Clearer illustrations/design/visuals to help users better understand how the sections interlink.	Have Superunion help propose visuals: a "mark/logo", one on process,
General	- Just one positive contribution factor seems inadequate for the SI label. It should be at least one criterion in each dimension that should be positive to really increase the ambition.	Could say that contribution to more than one will signal enhanced performance (and is highly encouraged). Data repository will also enable this comparison and those who are going above and beyond.
General	- list and scope appears too long / detailed for an infrastructure project, and compliance cost will be high. In comparison the Equator Principles focus on 10 questions that can typically be managed by a smaller team and reviewed by a single external consultant.	Noted.
General	- Don't agree with approach of meeting full baseline requirements for each criterion and adherence to (at least) one positive contribution factor. A full baseline analysis across all criteria may be too burdensome for infrastructure projects that may have well-defined ESG / sustainability aspects across a subset of these criteria (e.g. environmental factors mostly relevant to renewable energy)	Noted. There is consensus around the approach presented.
General	- The n/a for the positive contribution factors in most social and governance dimensions is concerning, as it can imply that there is nothing positive that assets/operators/investors can contribute on these beyond the baseline. We'd recommend building those elements out to highlight more clearly how organizations can go beyond the baseline.	- Positive contribution added to Social Dimension.
Environmental Dimension	- Suggest including an additional criterion in the environmental dimension that highlights the importance of spatial planning and siting decisions made during planning and design phases, that can influence ecosystem health and enhance biodiversity.	Use of alternatives analysis is good practice, should be highlighted for project feasibility stage ("where applicable").
General	- Indicators should be formulated to be SMART.	Not really applicable here - ESIA are SMART but not our KPIs.

General	- Regarding ANNEX [2] - Sustainability dimensions & criteria and indicative list of indicators, we suggest including: Promote and use green infrastructure instead of grey infrastructure (green infrastructure has the potential to replace functions that would otherwise be served by grey infrastructure, like flood defenses, water treatment, pollution control etc.	Scope to reference additional indicators beyond those included in the indicative list.
General	- Consideration of inter-relationships between the TBL aspects becomes critical to the least-developed countries. Since risks and deficiencies in each pillar can lead to triggering risks in the other pillars. For example, political risks can jeopardize economic systems while also endangering social and governance-related issues. This endangerment of sustainable development alignment in least-developed countries is more exposed by nature and therefore needs to be addressed.	Noted.
General	- As the economic pillar of the TBL encourages the improvement of producing beneficial economic long-term impact, the evaluation and alignment with this aspect of sustainability become very critical, especially for the least developed countries. The IS rating scheme of Australia seems to have covered this dimension through various analysis methods and thus can be illuminating guidance for demonstrating positive economic impact across communities.	Noted. Economic pillar is outside the scope of the SI Label. Such assessments will be done prior as part of investment due diligence.
Social Dimension; Governance Dimension	The criteria cover the key areas under the different dimensions. Additional areas MAM considers under the social and governance dimensions include - D&I in the context of ethnic diversity (as opposed to only gender and ability), data privacy and cyber security.	- Added in D&I reference to "Gender and Ability Inclusivity" criterion.
Adaptation & Resilience Dimension	- Dimension would benefit from further qualification - is it climate resilience or all natural hazard resilience or even wider in scope? - Helpful to distinguish between resilience of the infrastructure in focus and the resilience benefits the infrastructure brings to the local area/community.	Criteria is stated as referring to "natural hazard, climate, and human-made risks". The distinction between resilience of the asset and the resilience benefits to the local area/community is made between the baseline and positive contribution respectively.
Climate Change Mitigation	- Baseline footnote: While the alternatives analysis makes sense, past experience (HSBC energy policy) shows that it is potentially very complex / onerous to implement, unless it is standardized, say at the electricity grid level (where an average CO2 emission / kWhr would be calculated by the relevant utility rather than per project). - Baseline footnote: On carbon offsets this is an area fraught with greenwashing risk, on top of some emerging risks (e.g. forest fires destroying offset).	Alternatives analysis is only required for the more significant emitters (> 25,000 tCO2e/yr), which we feel is proportionate. Carbon offsets are considered to be a necessary part of net zero, hence their inclusion. Recognising the issues with poor quaity offsets, a good practice reference is included and reference made to carbon removal offsets.
General	- Baseline criteria should be clarified; also qualifying sectors should take into consideration the reality in emerging markets where certain technologies (EV/AV) may not be readily available. Other tech options that might use gas could still be more sustainable than other options.	The label allows local context to be considered by referring to an 'appropriate baseline'. Nevertheless, avoiding carbon lock in is a baseline requirement and any project must still meet the carbon threshold requirements in order to qualify.
Climate Change Mitigation	- A lot of care must be taken if organizations are going to be allowed to use carbon offsets to meet the baseline requirements for this criterion. Minimum standards on the quality of offsets should be introduced (e.g. Gold Standard or removal projects only).	This point is understood and has been reflected in the baseline criteria, with reference to carbon removal offsets, and in the example methodology by making reference to good practice carbon offsetting guidance.
General	- Document is called dimensions and criteria indicators, but the table only talks about baselines, positive contributions, methodology, and metrics. There should be an apparent reference to the indicators and coherence in the use of language.	We refer to metrics and indicators interchangeably. ACTION: make consistent these two terms.
Adaptation & Resilience Dimension	- The criteria for adaptation & resilience could be further improved by incorporating additional criteria on the contribution of the asset in the transition towards a net-zero economy. - Clear and unambiguous definition of resilience in the context of the specific infrastructure asset, its performance and risk exposure.	The framework states that the declaration should include an "asset-level statement on consideration of the project's lifecycle contribution to the transition toward net zero emissions". This may be incorporated into baseline requirements in future revisions of the label. Q: unclear if the second point is suggesting the framework/criteria documents define resilience and what that means to put into context of specific infra assets. OR if the suggestion is for the declaration to define resilience in the context of that specific infra assset.

Climate Change Mitigation	- Actual emissions should be considered in the positive contribution as well as reductions against hypothetical alternative scenarios. A classification of carbon intensity thresholds for various types of infrastructure would be useful. "demonstrating a positive GHG emissions avoidance as compared to an appropriate baseline" - how will this be assessed? Will further guidance be developed on defining an "appropriate baseline" as for infrastructure projects this is often not straightforward and open to different interpretations, noting the IFI Framework does not cover all infrastructure types included in Annex 1 of the Framework document. Perhaps a taxonomy approach would be more appropriate e.g. building on the list in Annex 1? - We do not agree that projects may use carbon removal offsets to reduce reported carbon footprints In line with international best practice (see for example VCMI - Accelerating credible net-zero climate action (vcmintegrity.org)), offsets "should complement rather than substitute for ambitious direct reductions". Qualification for the FAST-Infra label should be based on the alignment of the infrastructure asset with net zero pathways - without the use of offsets. This would also address issues around permanence of removal offsets. Where offsets are used to demonstrate additional action, this should be reported transparently so it is clear what are the emissions from the asset and what are the emission removals purchased. Carbon Offsetting guidance - may need to be kept under review e.g. based on outputs of VCMII and TSVCM - We also suggest referencing the Global GHG Accounting and Reporting Standard for the Financial Industry (developed by the Partnership for Carbon Accounting Financials)	1. Actual emissions are considered in the baseline, irrespective of whether or not the asset is meeting the positive contribution criteria. However, positive contribution is centred on avoided emissions and not carbon intensity thresholds. Comparison with an appropriate baseline incorporates an implicit accounting of carbon intensity of the project. It is acknowledged that certain sectors, through the IFI framework for example, have better developed baselines and we expect to see these methods emerge for other sectors. When they do the SI Label Framework will incorporate this guidance. 2. [same comment as earlier HSBC comment] Carbon offsets are considered to be a necessary part of net zero, hence their inclusion. Recognising the issues with poor quaity offsets, a good practice reference is included and reference made to carbon removal offsets. We agree that the label declaration should be transparent in how offsets have been used and so have added language to this effect. 3. Agree to add a reference to PCAF.
Land Acquisition & Resettlement	- Baseline should include avoiding economic displacement, providing like for like land and land tenure. Engaging with affected communities should include livelihood restoration plan as well as resettlement plan. Include requirement for third party expert to approve plans and monitoring and evaluation frameworks prior to implementation (as well as midterm and end as per IFC PS5). - Positive contribution should include community benefits which go beyond replacement for example schools/clinics/sport facilities with requirements for community consultation and monitoring. Promoting stakeholder engagement - Baseline should include requirement for separate consultation with women and other vulnerable groups. Also note that stakeholder engagement plan is to guide consultation as well identify and be able to address issues. Include requirement for project grievance mechanism.	TBC (if any change, this will be to criteria table).
Environmental Dimension	- Additional criteria within the mitigation dimension would have to be disclosed. - Reference to the EU Taxonomy Regulation could be included to help define the climate change mitigation and adaptation infrastructure activities - The following criteria could also be included: Environmental - Adaptation to Natural/Climate Disasters	EU Taxonomy is referenced in the example frameworks/methods. Adaptation to natural, climate and man-made risks (including disasters) is incorporated under the Adaptation and Resilience dimension.
General	- Suggest "Positive contribution factors" to be developed for Social and Governance criteria as well. It would be beneficial to demonstrate effort beyond compliance (Baseline) and help raise the bar for project performance. Although "Positive contribution factors" might not always be measurable for Governance and Social criteria, they would be important to establish a positive, performance accretive narrative. The feedback collected from projects could, in turn, benefit Label lessons learn and eventually be used for Label integration during the review process.	Agree and social 'positive contribution' criteria has been added following the consultation. Language has also been added to the framework document, stating that positive contribution can be declared for other criteria either not listed or listed as n/a under 'positive contribution'.
Climate Change Mitigation	The compatibility with a credible GHG pathway to 2030 and 2050 could be articulated more clearly as a positive contribution factor (similar to what is being proposed by the European Commission in their "Technical guidance on the climate proofing of infrastructure in the period 2021-2027". It does appear on page 3 "…alignment with low carbon pathways…" but Annex 2 on indicators uses language that only mention carbon reduction "Climate Change Mitigation/GHG Emissions Reduction". The April 2021 draft list of indicators also used similar language "The project will contribute positively to this criterion by demonstrating a positive GHG emissions avoidance as compared to an appropriate baseline." While such pathways are only starting to emerge and this may only be a criteria in developed countries, GHG Emissions reduction alone may not be enough to support the transition to carbon neutrality by 2050. Also such a criteria could guarantee that the asset will be compatible with a carbon-neutral world in 2050 – a significant risk for investors given the long operational life of infrastructure.	Paris alignment was considered as a baseline requirement under climate mitigation although it was recognised that a common definition was still lacking. When a suitable definition is adopted this will be incorporated in the baseline requirements. The first version of the SI Label Framework does include references to Paris aspects, including avoiding carbon lock in for example. Positive contribution is centred on avoided emissions, to highlight the important role of displacing higher emitting infrastructure assets.

Climate Change Mitigation	•⬛On environmental criteria, how are scope 3 related emissions and impacts from the supply chain taken into account? How about impacts resulting from manufacturing of the materials to build the infrastructure asset? •⬛It is only mentioned in a footnote and without a link, so wanted to confirm that this is the full list/documentation of the criteria required by the FAST label: https://www.climatepolicyinitiative.org/wp-content/uploads/2021/06/FAST-Infra-Dimensions-and-Criteria-Indicators_For-Consultation-2.pdf ? •⬛If so, we should definitely push for the GHG emissions to be set at 50g CO2e/ kWh or power density 10W/m2 as with the Climate Bonds Standard for new dams. Additional criteria apply if it is a pumped storage facility. See: https://www.climatebonds.net/files/files/standards/Hydropower/Hydropower%20broc hure%20Mar%202021.pdf	Baseline requirement cites lifecycle emissions, so covering all scopes. The document reference is correct. The threshold in climate change mitigation baseline requirements will be subject to regular review. The framework does allow users of the label to apply more stringent criteria where applicable to the local market or to match investor expectations.
Pollution Control	- Criteria needs to be more explicit in what it covers.	Noted.
General	- Agreed that meeting full baseline requirements and demonsration of adherence to at least one positive contribution factor makes sense.	Noted.
General	- Criteria should be flexible enough so that additional indicators can be added once they gain in importance.	Noted.
General	- Criteria is clear, but still insufficient to encompass land use related socioenvironmental impacts, as stated above.	Noted.
General	- The attached defintions all make sense, but how they are tested ad worked through needs to tested at a high level on numerous examples across the developed and developing world to understand if this fully works. The definition for social seems soemwhat woolly and enivronmental offers plenty of get outs. - worked examples need to be tested to understand how straight forward the criteria actually is	Noted; SI Label to be tested on live projects.
General	- The criteria cover the most important dimensions. What would be interesting to see are the benchmarks, how to quantify and measure them	Expect benchmarks to be developed over time.
General	- Caution against 'baseline requirements' (suggest there's some form of benchmark or comparison); suggests using 'Minimum Requirements.'	Noted - however - might cause confusion with minimum requirements of the SI Framework doc. Added new intro wording to address this and other similar comments. The following should be read in conjunction with the FAST-Infra Sustainable Infrastructure Framework (SI Framework) which sets out the full requirements and guidance for market participants seeking to apply the SI Label for infrastructure assets.
Biodiversity	- Suggest changing title to include 'Protection' (and enhancement of biodiversity).	- Amended in Framework and criteria table.
General	- Unclear whether project must meet all applicable IFC PS/EP4 requirements as the baseline, or only those listed under the dimensions. Recommend that compliance with IFC PS/EP4 is fully captured. - EP4 is referenced in the Framework, but not in the metrics table requirements, whereas IFC PS is referenced. Recommend that EP4 is consistently referred to in Baseline requirements.	See requirements of the Framework doc "Minimum Safeguards & Risk Management": At the stage of the asset lifecycle when the SI Label is applied, and throughout the rest of its lifecycle, the infrastructure asset shall demonstrate adherence to the following baseline requirements, or for each requirement, application of local and/or national law, whichever is the more stringent: •⬛FC Performance Standards on Environmental and Social Sustainability (IFC Performance Standards), 2012, and; •⬛quator Principles 4, July 2020, to the extent applicable to the project.
General	- 'Gaps filled' wording is confusing, suggest to amend to 'IFC PS+' to clarify additional reqs. Beyond IFC PS compliance.	Agree - have removed reference: NB will need to amend one reference within the Framework doc

Biodiversity	- Suggest to use STAR (Species Threat Abatement and Restoration) to inform the gap filling/screen for opportunities.
	 - Offsets are common so framework should consider allowing offsets.
	 - Change title for the biodiversity criteria to "Promotion and Enhancement of Biodiversity, Natural Environment, and Ecosystem Services":
	 - Better define/separate baseline and positive contribution. Possibility for ecosystem services to be included as positive contribution factor?
	 - Include mention of "Critical Habitat Screening or assessment' as a specified requirement within the baseline.
	 - Suggest keeping positive contribution factor linked to a specific deliverable that's easily distinguished from baseline:
	  Change positive contribution factor to three requirements (implemented in addition to all mitigation required to comply with PS6):
	   1) Project requirement to engage with an existing sustainable habitat community initiative:
	    % of project cost (commitment of X%)
	  2) Contribution to biodiversity data dissemination via additional field surveys to contribute to knowledge of a under-recorded / poorly researched species / habitat:
	 Potential requirement to engage with a local university and/or IUCN specialist
	 Potential requirement to produce a peer reviewed journal article
	 3) In addition to a contribution to community engagement
	 Raising awareness in local community, for example by schools
		Added STAR
		Offsets added to methodology (and suggested elsewhere)
		Title has bee stable for some time. Ecosystem services is included as a asset class. May cause confusion if added here.
		Added: Critical Habitat Screening / Assessment.
		Noted on other suggestions (have added IUCN references to methodologies)

General	- Heavy reliance on ESIA to meet example metrics, but this depends on project maturity or if high-level pre-feasibility is done. Make this clear in example metrics. - There should be some scoping or materiality assessment.	Materiality has been added to the main Framework doc based on other feedback. It is good practice to screen / materiality assessment for EISA and will need External Review to agree on approach.
General	- Better delineate what the 'gaps filled' are that IFC PS isn't covering.	Renamed at IFC+
Biodiversity	- This might not be relevant for all types of projects for e.g. energy efficiency in buildings. It should be clarified that some criterion can be 'not applicable' for certain project types. We recommend a sector by sector review of some of the requirements to ensure they are relevant.	Introduction states: *"Projects/assets are required to demonstrate adherence to at least one of these 'positive contribution factors' to satisfy that aspect of the SI Label (the Framework also includes other requirements). "* It is clear in the main Framework document that no all dimenstions apply.
Biodiversity	- <u>Example metrics</u>: Many projects won't have an ESIA. In some cases an independent engineer may have reviewed environmental issues and a law firm may have reviewed compliance with environmental legislation. - <u>Baseline</u>: Not sure how many infra assets can comply with baseline. Renewable energy is mostly diffuse and require very large amounts of land / sea - Usually more than fossil fuel generation assets. Together with the transmission line, etc., it is difficult to imagine how those would qualify. It may be useful to focus on relevant habitat, rather than generic natural land.	Clarification added in the main Framework doc that not all dimensions are applicable and if ESIA documentation required above is not available (e.g. due to the stage of project development), the infrastructure asset, its owner, and /or its financiers should : i) conduct an equivalent assessments; ii) publicly state why no such documentation is available; or iii) otherwise set out plans for future provision of such documentation.
Efficient Use of Natural Resources	- <u>Positive contribution</u>: needs to be standardized by industry / country for the baseline, rather than requiring specific project-by-project analysis. Can be updated over time	Positive contribution is not standardised by industry / country by design. It allows local application and interpretation against local baseline / counterfactual. In addition there is reference to the EU Taxonomy where that might be applicable for circular economy outcomes, (which is defined by activity).
Environmental Dimension	- Space to assess documents using existing standards such as TCFD.	The asset specific requirements of TCFD are aligned with the framework requiremements. In addtion the main Framework document includes for all projects the following requirement: •*Develop a full Climate Risk and Resilience Assessment for both physical and transition risk (using best practice methodologies), produced by a qualified independent firm or consultant, (if not separately conducted within the ESIA), including an asset-level statement on consideration of the project's lifecycle contribution to the transition toward net zero emissions;*
Environmental Dimension	- Could be worth having additional, strict criteria for certain assets within the environmental dimension (as opposed to the other 3) so that the assets that do qualify are distinct and represent a more elite group within the sector, with comparable value to assets that fall into the other dimensions.	Noted: however different investors will have different aims and investment strategies . Hence there is no distinction provided here. Disclosure will enable such consideration.

Environmental Dimension	- Contribution to net-zero transition: make clear that such statements should be made quantitatively as much as possible, with timeframes for anticipated impacts. An 'appropriate baseline' is too vague	•Develop a full Climate Risk and Resilience Assessment for both physical and transition risk (using best practice methodologies), produced by a qualified independent firm or consultant, (if not separately conducted within the ESIA), including an asset-level statement on consideration of the project's lifecycle contribution to the transition toward net zero emissions;
Environmental Dimension	- Include a criterion on alignment with international Agreements, like UNFCCC, CBD, and SDGs. As for now, only the resilience aspect is analyzed towards alignment with international agreements.	Typically international initivies have not been referecned by design. The introduction states *"The recommended methods of measurements and indicators are indicative, providing users the flexibility to provide rationale for the use of best available techniques as practices evolve. However, projects/assets need to provide rationale if other methods / metrics indicators are used"* **Note to include in FAQs**
Environmental Dimension	- We recommend assessing the percentage of land used by the project that has been previously disturbed or maintained as non-disturbed. To achieve this we suggest using the indicator, metric and calculation proposed in the "ALIGNED SET OF SUSTAINABILITY INDICATORS" to measure the percentage of land and classified it based on its level of previous use: greenfield sites, historic and cultural heritage, agriculture, designed parks or recreational space, greyfield and brownfield sites.	Not clear which criteria this is referencing. Similar metrics already provided in the biodiversity and included in assciated baseline?
Efficient Use of Natural Resources	- Could be broadened into a resource efficiency criteria that will help improve energy use efficiency as well as material use efficiency.	Critrea states: *"*Resources include recycled materials, improved efficiency in consumption of water, energy, and other resources/material inputs."*
Environmental Dimension	- Environmental section: This should include water abstraction and use management and requirement to include assessment of impact on human as well as ecological environment.	Consideration of water resource is included within "Promotion of the Efficient Use of Natural Resources/Waste Reduction & Supporting the Transition to a Circular Economy". Will also be covered in detail with baseline requirements for ESIA (or equivalent) plus Framework minimum safeguards.
Biodiversity	- Should be stretched beyond PS6. There are a lot of initiatives that are being developed and guidance should be sought to find the most appropriate, but consideration could be given to for example oIUCN policy on biodiversity offsets (2016) oScience based targets for nature (SBTN) initial guidance for business (2020) oNatural capital protocol (2020) oTNFD - should be considered - although still in its infancy ·Also, several frameworks that could be aligned to that other DFI/FIs are initiating: Partnership for biodiversity accounting financials and the Capitals coalition for example.	Baseline is already net gain however have updated the methodologies with references
Pollution Control	- Positive contribution should go beyond zero but require an improvement in a baseline parameter (e.g., cleaning a local river system).	The critrea is AND not OR for all receptors over the lifetime…(hence is considered a high bar for significant positive contribution) *"The project will contribute positively to this criterion by having zero negative impact/pollution on air, soil, and water quality, as well as land, fauna and flora, and the human environment during its whole lifecycle*."*

Biodiversity	- Suggest some completions as follow: 1. Regarding the phrase: "[...] at the same time, the project shall not lead to adverse impacts on biodiversity and ecosystem services and shall not significantly convert or degrade natural or critical habitats." - How can an infrastructure development project meet these criteria? Is it possible at all, on our actual technological level? We believe that more important would be the requirement of appropriate mitigation measures, that would be feasible. 2. Do we have some thresholds for environmental impacts? What exactly does interventions that enhance biodiversity and the natural environment mean? Building an infrastructure means a substantial disturbance in the area which can be mitigated, thus how to enhance BD there? (verge management or green bridge or ?). - Promotion and Enhancement of Biodiversity & the Natural Environment, Baseline Requirement - we suggest adding "including affected freshwater, terrestrial and marine habitats and their connectivity" at the end of the next sentence: "The project will meet the baseline requirements for this criterion by achieving overall net gain* for natural and modified habitats, as well as critical habitats." 5. Besides the mention of tools that are already in places, such as environmental impact assessment, monitoring plans and stakeholder engagement/ consultation we consider that is necessary an emphasis on the Strategic Environmental Assessment and on the Environmental Impact Assessment in the label. Is necessary to have a more detailed environmental examination in all the life cycle of the project. Also to be considered sustainable projects and have SI labels need to be presented an analysis of impacts (like direct threats, indirect threats, their underlying causes and to develop appropriate mitigation measures, if possible).	Difficult to address questions posed without specific suggested text. *"In addition, project site selection and design shall ensure maximum ecological connectivity."* Is currently part of the postivie contrubution (not baseline). There has been no other proposals to add to the baseline. *"This may be evidenced by conducting Critical Habitat Screening / Assessment."* Has been added to the baseline. Added: *"including affected freshwater, terrestrial and marine habitats"*.
Environmental Dimension	- Suggest also include in the list of indicators references regarding the promotion of nature-based solutions and also to Green Infrastructure, in particular, ecological corridors.	"Nature-based solutions" is included in the Famework as an asset type and will still be required to meet the full biodiversity requirements.
Biodiversity	Suggested edit to first baseline criteria within 'environmental dimension': "The project will meet the baseline requirements for this criterion by achieving overall net gain* for natural and modified habitats, as well as critical habitats. At the same time, the project shall not lead to adverse impacts on biodiversity and ecosystem services and shall not significantly convert or degrade natural or critical habitats, and any project operating in or around critical habitats will adhere to the Key Biodiversity Area Business Guidelines. https://www.iucn.org/theme/business-and-biodiversity/our-work/business-approaches-and-tools/business-and-key-biodiversity-areas •[GN54. Projects that are located within internationally and/or nationally recognized areas of high •biodiversity value may require a critical habitat assessment. Examples include the following: o Areas that meet the criteria of the IUCN's Protected Area Categories Ia, Ib and II.GN9 o Key Biodiversity Areas (KBAs), GN10 which encompass Important Bird and Biodiversity Areas (IBAs). •GN69. It should be noted that critical habitat Criteria 1-3 were based on the criteria and thresholds established in the IUCN Key Biodiversity Area (KBA) Standard. GN13]	Added *"Any project operating in, or around critical habitats will adhere to the International Union for Conservation of Nature (IUCN) Key Biodiversity Area Business Guidelines, as appropriate."* *"A Critical Habitat Screening / Assessment should be conducted for projects located within internationally and/or nationally recognized areas of high biodiversity value."*
Biodiversity	•Add suggested edit to 'example methodology' cell within first row of 'environmental dimension'. Existing text in italics, suggested additional text in italics red font. o This could include maintenance/ safeguarding/ increase of natural landscape area, including natural habitat and ecosystem services in km2 and in % for increase [ICMA - GBP], maintenance or increase in ecological connectivity, or reduction in drivers of biodiversity loss. Then add indicators for this in subsequent column: Trend in structural and/or functional connectivity Trend in biodiversity loss driver (e.g., human wildlife conflict incidents, level of overexploitation of wild species)	Added
Biodiversity	•Section [5]. Independent experts should demonstrate their capability to produce ecological data to fill the data gap. In many cases, they only gather from existing data. If the data is not available, it will become a gap. So, it is better to develop two function capacities as a data provider and design consultant.	Not included as suggested text not provided. Data gaps need to be closed or explained (see Framework doc). #]

Biodiversity	▢In the "Dimensions & Criteria" document, Under the example methods for the Biodiversity Criteria, need to include reference to Key Biodiversity Areas, as these are likely to be included in final post-2020 Global Biodiversity framework of CBD. [Again, though they are in the IFC PCs, worth explicitly mentioning in the document.] •▢In the "Dimensions & Criteria" document, add, "including affected freshwater, terrestrial and marine habitats" at the end of this sentence, "The project will meet the baseline requirements for this criterion by achieving overall net gain* for natural and modified habitats, as well as critical habitats." •▢Need to add a dimension/criteria focused on demonstration that the project is best suited/least impactful to fulfill energy, water delivery, transportation or other societal need.	Added: *"Key Biodiversity Areas"* *"including affected freshwater, terrestrial and marine habitats. "* *Would need to consult on an addional critrea methdology and metrcis etc, but noted.*
General	- Requirements under the four dimensions are very weak with respect to cultural heritage (should align with IFC PS8).	Added cultural heritage reference to Stakeholder Engagement section (with addition to reference guide on FPIC).
Human & Labour Rights	- Reference to 'supply chain': noted that baseline criteria (IFC PS) looks at supply chain, but not necessarily to the level of detail required to deliver a sustainable future.	Added footnote to Human & Labour Rights baseline criterion. Suggesting Tier 1 and Tier 2 Suppliers at a minimum.
Social Dimension	- Community outreach and social value is perceived as the weakest element captured across the dimensions; recommend that it should be identified as a positive contribution area.	Added positive contribution across social dimension, with emphasis on "Promoting Stakeholder Engagement" criterion.
Gender & Inclusivity	- Consideration of LGBTQ and gender-based violence should be included.	Included in footnote to Human & Labour Rights baseline.
General	- What does 'significant' mean in definition of 'Do no significant harm'?	Elaborated in Framework (material)
Social Dimension	- Indicator capturing cultural heritage - sites of archaeological, historical, cultural, artistic, and religious significance should be included in the baseline, and in the positive contribution factor.	Added to baseline and positive contribution criteria of "Stakeholder Engagement" criterion.
Social Dimension	- Capture criteria about marginalized and vulnerable communities and their inclusivity.	Mentioned across social dimension criteria - no further action.
Social Dimension	- Potential for additional criterion or mention of promoting social justice.	Out of scope for current criteria - to discuss.
Social Dimension	- Cultural heritage should be explicitly indicated as a criterion (or sub-criterion). Particularly, if there is any impact on people's livelihood sources, the change in their living conditions and access to livelihood sources should be monitored to avoid impoverishment risks.	Added to the "Promoting Stakeholder Engagement" criterion.
Human & Labour Rights	- Defining the boundary of supply chain for assessing this criterion can become challenging. More guidelines on how to set boundaries will be useful.	Added footnote to Human & Labour Rights baseline criterion. Suggesting Tier 1 and Tier 2 Suppliers at a minimum.
Gender & Inclusivity	- General comment: Difficult to check / implement / monitor for small infrastructure project. Unless the project is in a sector with a large potential negative impact on that front, this should be streamlined	Noted; no material change to document.
Human & Labour Rights	- <u>Baseline</u>: regarding disclosing human & labor rights across the supply chain▢ Difficult to put in place for individual projects. Unless in high risk industry.	Noted; to the extent possible, project developers should disclose. No material change to criteria document.
Social Dimension	- The criteria for social aspects could be further improved by including additional criteria for access to knowledge and resources that will empower disadvantaged communities to make the transition to a net-zero economy. Such an instance will ensure that any transition initiatives are 'just' and 'equitable'.	Unclear whether this is needed as a criterion.
Social Dimension	- Social section: This should spell out human rights as modern slavery, child labour, GBVH. - Addition for number of jobs created (M/F), number of people with new or improved access to infrastructure (M/F), number of businesses improving productivity through infrastructure (downstream), value of contract injected in the local economy (upstream), could be added, in line with comments made in Q5 above. - Social Section also requires inclusion of protection of cultural heritage and protection of indigenous people's rights and FPIC (Free Prior and Informed Consent). - A section should be developed on projects security management. This should include requirement to develop stakeholder engagement plans and align to the Voluntary principles of security and human rights. It should include requirement for grievance mechanisms for communities. We have our own internal PIDG GPN that could be used to develop.	- Inclusion of cultural heritage and indigenous peoples included in "Promoting Stakeholder Engagement" section. - Mention of human rights as modern slavery, child labour, GBVH in the 'Protection and Enhancement of Human and Labour Rights' criterion. - Addition of Voluntary Principles of Security and Human Rights to the "Human and Labour Rights" Criterion example methodology column.
Gender & Inclusivity	- In addition metrics should include # or % of women accessing / benefiting from infrastructure and / or # of adjustment made to ensure women and people with disabilities benefit equally. - Baseline should include requirements for inclusion (consider ethnic, racial and disabilities). Baseline should include requirements for Gender based violence and harassment risk assessments and actions plans developed as per risk. - Positive contribution should include setting targets for gender empowerment and transformation, senior management gender rations, inclusive design.	- Added GBVH risk assessment/action plan to the baseline criterion. - Added setting targets for gender empowerment in the positive contribution criterion. - Added metrics to example metric section.

Human & Labour Rights	- Baseline: Suggest aligning recruitment processes and labour management to ILO core conventions. Contractor management processes that pass same labour rights to contractors. Human rights safeguarding policies and processes inclusive of modern slavery, child labour and GBVH to be in place and procurement processes to pass commitments to suppliers. Require adherence to safeguarding code of conduct. - Include as a minimum a set of human rights safeguarding criteria for example the PIDG safeguarding rules https://www.pidg.org/wp-content/uploads/2020/10/The-PIDG-Safeguarding-Rules-Final-2.pdf - Should consider a positive contribution to human rights, for example working with local GBVH service providers to support both affected and wider communities.	- Added a positive contribution criterion (needs to be checked). - Included PIDG Safeguarding Rules resource as an example methodology. - Criteria already includes ILO Core Conventions as example metric (no change required in doc); included language on aligning recruetment process/labour management to ILO core conventions in "example metric" section.
Social Dimension	- Dimension could be covered with the Social Bond Principles activities. - Additional criteria on Cultural Preservation.	Cultural preservation mention added to the "Promoting Stakeholder Engagement" criterion. Positive contribution factors added to Social Dimension, definition of "Vulnerable People" added as an asterisk at first mention.
Social Dimension	- The criteria within the social dimension do not specify what is considered "Positive Contribution Factor"; instead, the framework leaves the criteria as "N/A." Therefore, it would be helpful to know examples of positive contributions and what is included in the definition of "vulnerable people groups."	
Social Dimension	Under Social criteria, missing reference to FPIC criteria, and explicit mention of the right of consultation of indigenous peoples and local communities. [Even though it is embedded in the IFC PCs, this critical issue should be explicitly noted in the FAST document.]	Added to positive contribution factor of "Promoting Stakeholder Engagement" criterion.
Metrics	- Recommend adding a list of resources from where organizations can find other indicators if required.	
Environmental Dimension	Annex [2] Environmental criteria should be added to restore/ rehabilitate the habitat: Recovery plan of the ecosystem/ habitat to adapt to new conditions after degradation/disturbance by the physical impact during preparation, construction and post-construction. Please add: "Embedding system-scale analysis that explores alternative infrastructure development options (e.g. in energy systems hydropower versus solar/wind and nature-based or hybrid options versus grey infrastructure) and their trade-offs, selecting the scenarios that are least impactful across social, environmental and economic considerations." This is the single most important step to consider proper evaluation of all options which is systematically falling short in SEA/EIA or any other evaluation framework. framework. And foresee no go areas for key biodiversity areas. •There are the standard promoting tools that are already in place, like impact assessment, monitoring plans and stakeholder engagement etc. An emphasis on Strategic Environmental Assessment would be good. •There is a focus on small hydropower, what we don't see as sustainable. Maybe we should try to ban hydro from free flowing rivers. •The decision-making process should consider climate change scenarios. For example, in Brazil there are concessions for hydro, but the projections show that we won't have enough water.	Removed emphasis on small hydro. Included additional language to environmental dimension.
Adaptation & Resilience Dimension	- Make reference to PCRAM in the example methodology and metrics. PCRAM could contribute to the 'how' the asset-level risks can be quantified. The MDB Framework, would need a review to see how the two align. A look into the IFC Performance Standards would be required to see how both align. - In example methodology: CCRI methodology is similar to that in the WB RRS its sort of a mix between 1, 2, and 3 - In metrics: "Y/N responses to key questions: 1. Project has a comprehensive risk/resilience assessment to disasters and climate hazards? [e.g. GEF – RAPTA/WB RRS]" -->replace this reference with PCRAM.	Team reached out to CCRI about obtaining PCRAM methodology. If available, we will make reference. Current wording of A&R is sufficiently flexible to allow for reference to PCRAM once made publicly available.

Question	Draft Response
- What are the costs of obtaining and retaining the label?	Already overed in the FAQ under associated costs of compliance
- Where do I go for additional guidance?	Secretariat can provide additional guidance beyond those resources included in the SI Label documents (Framework and Criteria/Dimensions table)
- What are the financial benefits of obtaining the SI Label?	Covered in FAQ
- What can be considered official sources of information?	Industry best practice frameworks, taxonomies, standards.
- If I disclose alignment with TCFD, does that cover the resilience dimension?	Add to FAQ: "Q: if I have already disclosed an asset's alignment with another framework will that cover the relevant criteria? A: Disclosures for referenced frameworks may be used to support the SI Label disclosure as applicable. The disclosure will need to be asset-specific and clearly meet all the requirements of the respective criteria."
- Will there be an oversight and compliance committee? How long will the FAST-Infra initiative be implemented? Is there long-term financial support guaranteed?	Process to be determined by Secretariat. SI Label will be self-declared without oversight/compliance committee; this may be revisited by Secretariat.
- Why should one obtain an SI Label? What are the benefits over an entity or project that does not have an SI Label?	Covered in FAQ
- Questions related to positive social impacts could be added if these dimensions are developed further.	Noted and added to criteria/dimensions table.
- What are the circumstances that SI Label can be withdrawn/ lost by the applicant? - Under what conditions would they lose the SI Label (after they acquired it)? If they don't meet the reporting or annual disclosure requirement? If their justification of DNSH and positive contribution no longer works? Should provide clear guideline on that.	Added to FAQ under "Compliance" header with draft response: It is the responsibility of the asset owner to ensure that the SI Label requirements continue to be met, which must be disclosed at the required reporting intervals as outlined in the SI Framework. Failure to adhere to these requirements will result in the asset being considered non-compliant with the SI Label.
- How does the Label identifies land use related socioenvironmental impacts?	

- How will compliance towards voluntary as opposed to mandatory regulatory schemes be weighted when assessing a project under the SI Label?

Label is agnostic on other schemes

- Will there be a list of approved or recommended "Independent External Review" companies that vary by region?

This can be a point taken up by the Secretariat.

- What is the baseline reporting standard? (How much information needs to be disclosed and how is the information going to?)

See Framework doc

Answered in the FAQ on 'How will reporting be aggregated and shared?'

- Will the annual Impact Report be disclosed to the public?

- How were indicators selected for the criteria table?

Clarified in the FAQ response under "Standards"

- The development of the 14 sustainability criteria that underpin the SI Label was developed as a result of an extensive mapping against 21 leading standards in the market" → Can they choose to report against any of the existing standards and still get the label? *Clarify in current response listed in FAQ.*

No - see Framework doc

- Minimum Safeguards & Risk Management: "Publish in the public domain an Environmental and Social Impact Assessment (ESIA) produced by a qualified independent firm or consultant;" - they need to make public who has realized & and who paid for the ESIA and also demonstrate that the process was independent, correctly done, without conflict of interest.

From Framework feedback: The EISA document would typically include all these details. The need to be independent is stated already.

- The "declaration, disclosure, and reporting" section of the framework provides a skeleton of the voluntary requirements. However, it does not disclose specific details on i) the submission process, ii) who will perform the review process, iii) Disclosure requirements to the public, iv) what are the qualifications to be an "Independent External Review" company, and v) what defines a "significant positive contribution to one or more of the sustainability objectives." It would be helpful if the framework had a Q&A section that provides more details for end-users of the SI label.

Add to the FAQ