PROGRAM NAME:	Verified Carbon Standard (VCS)
ORGANIZATION:	Verra
ASSESSMENT TYPE:	CORSIA Approved – Program Level Assessment
DATE OF SUBMISSION:	NOVEMBER 21, 2023
EXPORTED ON:	MARCH 15, 2024
STATUS:	IN REVIEW

BACKGROUND

Must Read
Please acknowledge that you have reviewed the details provided in the "Background" section.
We have reviewed the Assessment Framework background materials.

Yes

CORSIA Eligibility
Please provide the following details in regards to your programme's CORSIA eligibility.
Our programme has been approved for CORSIA-eligibility.

Yes

https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/CORSIA%20Eligible%20Emissions%20Units_March2023.pdf

Page 8 of the CORSIA document "CORSIA Eligible Emissions Units (see above URL): VCS credits, issued to activities that started their first crediting period from 1 January 2016 and in respect of emission reductions that occurred through 31 December 2020, are eligible for use towards CORSIA offsetting requirements in the 2021-2023 compliance period (the "pilot phase"). There are limitations on which project types / methodologies have been accepted for CORSIA for the pilot phase, however these do not relate to the CCP program-level criteria.

The VCS has been additionally "approved as conditionally eligible for the first phase (2024-2026 compliance period), subject to further review by TAB of the programme's updated procedures", as set out in para 4.2.4.1 in the following TAB Recommendations from its First Re-assessment:

https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB%202022/TAB%20recommendations_reassessment/EN_RECOMMENDATIONSMARCH2023.pdf

The specific further work to be undertaken by Verra to meet these conditions was: (a) procedures for reevaluating baselines and procedures/assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario, for projects that have not undergone verification for a certain number of years, (b) a statement that projects using methodologies that allow for unenforced policies will not be eligible for the first phase and (c) procedures to prevent double claiming, consistent with the CORSIA criteria of "only counted once towards a mitigation obligation".

Verra submitted information on the above changes to the VCS Program to ICAO in August 2023 and expect the conditions on its first phase eligibility to be lifted by the ICAO Council in March 2024.

Methodologies for Exclusion
Please list any methodologies (name and URL) that your programme would like to have excluded from Category-level assessment by the ICVCM team.
If none, please enter "None" or N/A.

Verra excludes the following methodology versions from further category-level assessment:

REDD methodologies

VM0006 Methodology for Carbon Accounting for Mosaic and Landscape-scale REDD Projects, v1.0 to v2.2

VM0007 REDD+ Methodology Framework (REDD-MF), v1.0 to v1.7

VM0009 Methodology for Avoided Ecosystem Conversion, v1.0 to v3.0

VM0015 Methodology for Avoided Unplanned Deforestation, v1.0 to v1.2

VM0037 Methodology for Implementation of REDD+ Activities in Landscapes Affected by Mosaic Deforestation and Degradation, v1.0

Other methodologies

VM0004 Methodology for Conservation Projects that Avoid Planned Land-use Conversion in Peat Swamp Forests, v1.0 to v2.0

VM0010 Methodology for Improved Forest Management: Conversion from Logged to Protected Forest, v1.0 to v1.3

VMR0006 Energy Efficiency and Fuel Switch Measures in Thermal Applications, v1.0 to v1.1

A – GOVERNANCE

1.1   Effective Governance

a) In addition to CORSIA requirements related to governance framework, confirm that your organisation:

1) has a board comprised of independent board members who assume fiduciary responsibility for the organisation and operate according to robust bylaws.
Yes

https://verra.org/about/board-of-directors/

The Verra Board of Directors is comprised of leaders from a variety of sectors who bring their expertise and knowledge to the ongoing development of Verra. Working through a variety of sub-committees, Verra Board members oversee the finances of the organization, work closely with Verra staff to guide the direction of Verra, and are involved in specific strategic initiatives. Verra Board members do not advocate on behalf of any one project or program before any of Verra's programs.

Board members are independent of the organization, receive no compensation for services rendered and assume fiduciary responsibility for the organization. Verra's Bylaws are here: https://verra.org/wp-content/uploads/2023/08/Verra-Amended-and-Restated-Bylaws_approved_23-March-2023.pdf .

2) publishes an annual report that contains the organisation's revenues, expenses, and net assets over the past year and provides an overview of the organisation's mission, major programs and activities, and governance.

Yes

https://verra.org/about/overview/

All annual reports may be found under the above URL under "the organization". These contain financial information as well as information on Verra and its activities.

3) Has processes in place to ensure corporate social and environmental responsibility.

Yes

N/a

Verra has recently been consolidating policies and processes relevant to its corporate social and environmental responsibility into a single policy statement. This consolidated document is still subject to final approval and will soon be made available.

4) Has robust anti-money laundering processes in place.

Yes

https://verra.org/wp-content/uploads/2023/09/Final-Verra-Sanctions-and-AML-Compliance-Policy-1.pdf

The Sanctions and Anti-Money Laundering Compliance Policy can be found on the above URL.

5) follow practices consistent with robust anti-bribery and anti-corruption guidance and regulation.

Yes

https://verra.org/wp-content/uploads/2023/09/Final-Verra-Anti-Corruption-Compliance-Policy-1.pdf

The Anti-Corruptions Compliance Policy can be found on the above URL.

6) Provide a summary description of your programme (300 – 500 words)

https://verra.org/programs/verified-carbon-standard/vcs-program-details

The Verified Carbon Standard (VCS) Program is the world's most widely used greenhouse gas (GHG) crediting program. Individual projects and jurisdictional programs can be registered under the VCS Program.

All VCS projects and programs must complete a rigorous development and assessment process before registering with the VCS Program. Projects and programs registered in the VCS Program are issued unique carbon credits known as Verified Carbon Units or VCUs. Each VCU represents a reduction or removal of one tonne of carbon dioxide equivalent (CO_2e) achieved by a project. VCS quality assurance principles ensure all VCUs represent GHG emission reductions or removals that are real, measurable, additional, permanent, independently verified, conservatively estimated, uniquely numbered and transparently listed.

VCUs can be labeled with certifications awarded by other, non-GHG programs that have been approved by VCS. These additional certifications typically represent community and biodiversity benefits achieved by projects, in addition to the climate benefits inherent in a VCU.

VCS projects implement a wide variety of activities that reduce or remove greenhouse gas emissions, improve livelihoods, and protect nature. Projects are categorized by their sectoral scope, ranging from waste handling and disposal projects (such as biochar projects) to land use projects (such as improved forest management projects).

The VCS rules and requirements also form the foundation for the Jurisdictional and Nested REDD+ (JNR) framework. REDD+ is reducing emissions from deforestation and forest degradation, as well as ensuring the sustainable management of forests and the conservation and enhancement of forest carbon stocks. The JNR framework is the world's first integrated accounting and verification framework for jurisdictional REDD+ programs and nested projects. VCS jurisdictional and nested REDD+ programs are government-led strategies that harmonize emission reductions across national REDD+ programs as well as subnational and/or project activities.

The VCS Program rules define the standards and processes that all projects must follow to be certified and are set out in a suite of documents: Requirements, Procedural, Templates, and Guidance. Correction documents may be issued periodically to correct errors in text, equations, or figures in VCS Program documents or methodologies. In addition, clarification documents may be issued to provide additional guidance or clarity on VCS Program rules, or to issue minor, urgent updates to requirements in between new versions of VCS Program documents. Corrections and clarifications will be incorporated into the next issued version of the relevant program document or methodology, at which time the corrections and clarifications will be moved to an archive page on the Verra website.

For further information and links, please see the following webpages:

- https://verra.org/programs/verified-carbon-standard/#program-overview
- https://verra.org/programs/verified-carbon-standard/vcs-program-details
- https://verra.org/registry/overview/

See above URL and summary description

1.2 Public Engagement, Consultation and Grievances

a) In addition to CORSIA requirements related to public engagement, consultation and grievances, confirm your organisation:

1) has processes for robust and transparent local and global stakeholder consultation processes, which provide for public comment and issue resolution.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Program requires that project proponents engage with and respond to stakeholders during both project design and implementation. Section 3.18.1-3.18.6 of the VCS Standard (see above URL) specify the overall nature of such stakeholder engagement and consultation at local level, the conduct of the engagement and consultation, including account to be taken of input received, possible updates to project design, and grievance redress procedures. Much of this local consultation occurs during the development of a new project but these sections also specify mechanisms for ongoing communication with stakeholders during project implementation and information to be communicated prior to each validation/verification event.

After projects are listed in the project pipeline and Verra has reviewed project documentation for compliance with VCS program rules and requirements, the project status is updated from "under development" to "under validation" and a 30-day public comment period commences. This is the global stakeholder consultation process under the VCS Program.

Sections 3.18.9 to 3.18.16 of the VCS Standard v4.5 (see above URL) set out requirements, inter alia, for the public comment period, the submission of comments, Verra's summary of comments received, account to be taken of comments received, the relationship to validation by the VVB, and the ability to submit comments outside of the 30-day public comment period.

Section 3.1 of the Registration and Issuance Process https://verra.org/wp-content/uploads/2023/08/Registration-and-Issuance-Process-v4.4-last-updated-4-Oct-2023.pdf includes process steps for the sequencing and integration of project changes as a result of the stakeholder engagement and consultation at the local and global public comment levels. Section 7.3 includes process steps for comments received outside the public comment period (section 7.3).

The Methodology Development and Review Process also includes requirements for public consultation as described below.

Verra also conducts public consultations on updates to the VCS program as outlined at https://verra.org/consultations/public-consultation/

2) has processes for addressing grievances. The process shall be clear and transparent, ensure impartiality and where appropriate confidentiality, in the filing and resolution of grievances. Any applicable fees shall not impede legitimate access to the grievance process by civil society organisations or IPs & LCs.

Yes

https://verra.org/wp-content/uploads/2019/01/Verra-Complaints-and-Appeals-Policy-v1.0.pdf

The VCS Program requires that project proponents implement a grievance redress procedure to address disputes with stakeholders that may arise during project planning and implementation. Section 3.18.4 of the VCS Standard (https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf) specifies that this must include receiving, hearing, responding and attempting to resolve grievances within a reasonable time period, taking into account culturally appropriate conflict resolution methods and that the procedure and documentation shall be made publicly available. The procedure has three stages: (a) attempting to amicably resolve grievances, (b) mediation by a neutral third party and (c) referral to either arbitration or competent courts in the relevant jurisdiction.

Verra's Complaints and Appeals Policy, v1.0 (PDF) provides a complaints procedure and an appeals procedure that applies to all standards and programs managed by Verra.

Section 1 of the Complaints and Appeals Policy, v1.0 (PDF) outlines clear and transparent steps for what is required in the filing and resolution of grievances, including a process to ensure:

1) **Impartiality** (bullet #3: Verra appoints an appropriate person to handle the complaint, who will organize an analysis (involving external experts, as required) and determine any appropriate action required) and;

2) **Confidentiality** (bullet #5: All information submitted by the complainant with respect to the complaint is kept confidential by Verra).

The Complaints and Appeals Policy, v1.0 (PDF) **ensures any applicable fees shall not impede legitimate access to the grievance process** by civil society organisations or IPs & LC, through the following:

"All expenses, internal and external, incurred by Verra in handling complaints and appeals shall be paid by the entity filing the complaint or appeal. Prior to initiation of the handling process, Verra will inform the entity filing

the complaint or appeal of its estimated handling cost. Where the outcome of a complaint or appeal is to overturn an earlier decision made by Verra, the entity filing the complaint or appeal will not be liable for covering such expenses."

Complaints by stakeholders about a project proponent or its partners should be pursued directly with the respective entity. Similarly, complaints about entities providing services under the relevant Verra program, such as assessors, should be pursued directly with the respective entity. Where such a complaint is not resolved to the satisfaction of the complainant and the complaint relates to the entity's interpretation of a program rule, the complainant may submit a complaint to Verra.

Where a complaint is ultimately not resolved to the satisfaction of the complainant, an appeal may be addressed to the Verra CEO for presentation to the Verra Board.

2.1 Effective Registries (Retirement and Addressing Erroneous Issuance)

a) In addition to CORSIA requirements related to carbon credits in your carbon-crediting program registry, confirm that your organisation:

1) requires identification of the entity on whose behalf the carbon credit was retired

Yes

https://verra.org/wp-content/uploads/2023/08/Registration-and-Issuance-Process-v4.4-last-updated-4-Oct-2023.pdf

Section 4.6 of the Registration and Issuance Process (see above URL) sets out the process for retiring and cancelling VCUs.. Retirements are initiated by the registry account holder or its authorised representative. Retirement is defined by Verra as "The permanent removal of a VCU from circulation in the Verra Registry system to denote it has been used by the owner in a claim" https://verra.org/wp-content/uploads/2023/08/VCS-Program-Definitions-v4.4-updated-4-Oct-2023.pdf.

Section 8 of the Verra Registry User Guide https://verra.org/wp-content/uploads/Verra-Registry-User-Guide.pdf provides descriptions of the relevant registry screens. When making a retirement, the following fields are mandatory: (a) Beneficial Owner (that is, the entity on whose behalf the VCU is retired), (b) the retirement reason and (c) retirement reason details.

Options are currently provided for the Account Name, Beneficial Owner, Retirement Reason and Retirement Reason Detail to be made public or not made public. To be clear, CCP criterion 2.1 states that the carbon crediting program shall require identification of the entity and does not require the program to make that identification public.

2) requires the identification of the purpose of retirement

Yes

https://verra.org/wp-content/uploads/2023/08/Registration-and-Issuance-Process-v4.4-last-updated-4-Oct-2023.pdf

Section 4.6 of the Registration and Issuance Process (see above URL) sets out the process for retiring and cancelling VCUs.. Additionally, section 8 of the Verra Registry User Guide https://verra.org/wp-content/uploads/Verra-Registry-User-Guide.pdf provides descriptions of the relevant registry screens. A retirement reason must be provided when a retirement is made.

The retirement reasons are available within the registry (https://registry.verra.org) from the retirement screen. These retirement reasons distinguish voluntary retirements for a person or organization and specific compliance purposes (e.g., South African Carbon Tax Act).

3) has procedures to address erroneous issuance of carbon credits that identify remedial measures (e.g., cancellation, compensation through replacement) and the entities responsible for implementing these.

Yes

https://verra.org/wp-content/uploads/2023/08/Registration-and-Issuance-Process-v4.4-last-updated-4-Oct-2023.pdf

Section 6 of the Registration and Issuance Process (see above URL) sets out the possible grounds and process for reviewing registered projects and the issuance of VCU where Verra has concerns about adherence of the project to the VCS Program rules and the applied methodology. Section 6.15 addresses how compensation is to occur in cases where it has been determined that VCUs have been issued in excess of the correct amount:

"6.1.5 Where Verra determines that VCUs have been issued in excess of the correct amount, the following applies:

1) The project proponent is responsible for compensating for excess VCU issuance where Verra deems, acting reasonably, that there has been a material erroneous issuance of VCUs in respect of the project, as a result of the fraudulent conduct, negligence, intentional act, recklessness, misrepresentation or mistake of the project proponent, as set out further in the issuance representation.

2) Any compensation for excess VCU issuance shall be through the following, with Verra using reasonable efforts to work with the project proponent to ensure that any adverse impacts on the project proponent are minimized to the extent possible: (a) Where the excess VCUs remain in the project proponent's Verra Registry account and it can be demonstrated that they have not been used for offsetting purposes, immediate cancelation of the VCUs; (b) Replacement of VCUs through immediate cancelation from subsequent issuances of VCUs to the project; (c) Purchase by the project proponent of an equivalent number of replacement VCUs, and cancelation of same, within 60 business days of receiving formal Verra notification of such required action.

3) Where the project proponent fails to compensate for excess VCU issuance, Verra may take action against the project proponent, including applying sanctions with respect to its registry account activities until such time as the excess issuance has been compensated."

3.1 Information

a) In addition to CORSIA requirements, confirm that your organisation ensures that in relation to each mitigation activity that requests registration or that is registered, all relevant documentation relating to the mitigation activity is made publicly available (subject to confidentiality and proprietary, privacy and data protection restrictions) including:

1) all necessary information, such as spreadsheets used for calculations, to enable third parties to assess the social and environmental impacts of the mitigation activity and to replicate the GHG emission reduction or removal calculations (including baseline quantification), and assessment of additionality.

Yes

https://verra.org/programs/verified-carbon-standard/vcs-program-details/

The VCS Project Description Template v4.3 is available through the above URL (under "Templates and Forms"). Section 4 of this template requires the inclusion of information equivalent to that required under CCP criterion 3.1 a) 1), in relation to the quantification of baseline emissions, project emissions, leakage emissions and, ultimately, estimated GHG emission reductions and removals.

For each area, project proponents are required to, inter alia, "Include all relevant equations ... and provide sufficient information to allow the reader to reproduce the calculations. Explain and justify all relevant methodological choices (e.g., with respect to selection of emission factors and default values). Include all calculations in the emission reduction and removal calculation spreadsheet."

2) a mitigation activity design document that includes:

   i.   a non-technical summary.

   ii.   detailed information on the mitigation activity, including its location and proponents.

   iii.   a description of the technology or practices applied.

   iv.   the environmental and social impacts.

   v.   the methodology used.

   vi.   information on how the methodology is and has been applied for the purpose of determining the baseline, demonstrating additionality and quantifying GHG emission reductions or removals.

Yes

https://verra.org/programs/verified-carbon-standard/vcs-program-details/

The VCS Project Description Template v4.3 is available through the above URL (under "Templates and Forms"). This requires the inclusion of information equivalent to that required under CCP criterion 3.1 a) 2):

- Section 1.1 (Summary Description of the Project) addresses the needs of non-technical summary

- The remainder of section 1 (Project Details) addresses much project information, including detailed information on the mitigation activity, including its location and proponents, and a description of the technology or practices applied.

- Section 2 (Safeguards and Stakeholder Engagement) addresses environmental and social impacts

- Section 3 (Application of Methodology) address the methodology used and information on how the methodology is and has been applied for the purpose of determining the baseline, demonstrating additionality and quantifying GHG emission reductions or removals.

3) For Categories listed in 9.1 b) 1, information relating to the monitoring and compensation period. URL:

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The AFOLU Non-Permanence Risk Tool v4.2 (see above URL) contains the requirement to make public the project longevity (monitoring and compensation period) of the project:

"2.2.4 Project longevity (PL) shall be assessed using Table 4, noting the following:

1) The project longevity score shall be determined by the formulas set out in Table 4.

2) Evidence shall be provided demonstrating that project ownership (see the VCS Standard for project ownership requirements) can be maintained for the entire project longevity (e.g., where ownership is secured through a concession that is shorter than the project longevity, the concession is renewable for the entire longevity period being claimed).

3) For all AFOLU project types, the entire project longevity shall be covered by management, financial, and monitoring plans submitted to local government, financial institutions, or made public."

b) Confirm that your organisation has processes to ensure that where requests are made in relation to information that is missing from your website and/or registry, that information is provided (subject to confidentiality and proprietary, privacy and data protection restrictions) and made public alongside other relevant public information.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) provides for receiving and responding to requests for project documents missing from the registry, equivalent to CCP criterion 3.1 b):

"3.18.16 Stakeholders may submit comments at any time to request project documents that are missing from the Verra Registry. The Verra Registry will coordinate with the project proponent to provide any such documents to the project record on the Verra Registry and notify the stakeholder once the document is posted."

4.1 Robust Independent Third-Party Validation and Verification

a) In addition to CORSIA requirements, in relation to validation of mitigation activities and verification of GHG emission reductions and removals, confirm your organisation:

1) requires VVBs to be accredited by a recognised international accreditation standard (e.g., according to the current edition of ISO 14065 and ISO 14066, or per rules relating to the UNFCCC Kyoto Protocol Clean Development Mechanism or Paris Agreement Article 6, paragraph 4 Supervisory Body).

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Program-Guide-v4.4.pdf

Section 5 of the VCS Program Guide v4.4 (see above URL) specifies that "VVBs are eligible to provide validation and verification services under the VCS Program if they have signed the required agreement with Verra and are:

1) Accredited by an accreditation body that is a member of the International Accreditation Forum (IAF) and granted recognition for IAF Multilateral Recognition Arrangement (MLA) under ISO 17029 and/or 14065; or

2) Accredited under a VCS-approved GHG program; and

3) Approved by Verra and listed as an active validation/verification body on Verra's website."

Further information on the process for becoming accredited, including an application form and VVB agreement template, are publicly available on the Verra website https://verra.org/validation-verification/#for-the-vcs-program. This also includes lists of approved and active/inactive VVBs, their contact information and links to underlying proof of accreditation.

2) has a process for managing VVB performance, including systematic review of validation and verification activities, reports and remedial measures to address performance issues including measures to ensure that poor VVB performance is reported to the relevant accreditation body, and provisions to suspend or revoke the participation of a VVB in the program.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Program-Guide-v4.4.pdf

Section 2.5.6 of the VCS Program Guide v4.4 (see above URL) describes Verra's role, which includes oversight of the validation/verification bodies operating under the VCS Program. Oversight includes reviews of validation and verification project reviews to ensure the validation/verification body has appropriately assessed, and fully described how it has assessed, the project's conformance with the VCS Program rules.

Verra also conducts other types of validation/verification body oversight activities and reviews including (but not limited to), desk reviews of the validation/verification body work, visits to the validation/verification body offices, witnessing the validation/verification body undertaking audits (in person and remotely), and reviewing work products developed by the validation/verification body in performing the audits.

Where Verra identifies shortcomings in a validation/verification body's performance, Verra provides feedback and requires the validation/verification body to address non-conformities. Verra also reports validation/verification body performance to the respective accreditation body. Verra reserves the right to take action against validation/verification bodies and implement sanctions in accordance with the provisions set out in the VVB agreement signed with Verra. The rights and obligations for validation/verification bodies are set out in such agreements.

Section 6 of the VCS Program Guide describes Verra's sanctions process for VVBs. It outlines how based on its oversight activities, Verra has sole discretion to apply sanctions that vary according to the severity of issues

and/or non-conformance(s) where validation/verification bodies are found by Verra to be conducting services out of conformance with the governing accreditation body and/or VCS Program rules or deemed by Verra to be performing poorly. It clearly states Verra may share the results of its validation/verification body non-conformity reports with relevant accreditation bodies and outlines the suspension of VVBs per the provisions set out in the VVB agreement.

B – EMISSIONS IMPACT

5.1 Methodology Approval

a) In addition to CORSIA requirements related to Clear Methodologies and Protocols and their Development Process, please confirm that your organisation has a process for developing and adopting updates to existing quantification methodologies.

Yes

https://verra.org/wp-content/uploads/2023/08/Methodology-Development-and-Review-Process-v4.3-1.pdf

The VCS Program has met all conditions required to provide CORSIA Eligible Emissions Units (including those related to Clear Methodologies and Protocols and their Development Process) as outlined here: https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-Emissions-Units.aspx

Verra has a process for developing and adopting updates to existing quantification methodologies, which are outlined in the VCS Methodology Development and Review Process document https://verra.org/wp-content/uploads/2023/08/Methodology-Development-and-Review-Process-v4.3-1.pdf

"This document provides guidance and procedures for developing or revising VCS methodologies, modules, and tools (referred to in this document as "methodologies"). It also includes the procedures for Verra's review of approved methodologies to ensure that they continue to reflect best practices, scientific consensus, and evolving market and sector conditions.

The methodology development and review procedure is also outlined at a high level in the VCS Program Guide: https://verra.org/wp-content/uploads/2023/08/VCS-Program-Guide-v4.4.pdf"

Methodologies developed or revised under the VCS must meet the requirements in the VCS Methodology Requirements document: https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

Note, all of the principles that inform methodology development are found in the VCS Methodology Requirements document: https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

b) Confirm your organisation's approved methodologies or general carbon-crediting program provisions address the following essential components:

1. **applicability or eligibility criteria.**
2. **determination of the accounting boundary.**
3. **determination of additionality (to the extent this is not covered in other general carbon crediting program provisions).**
4. **establishing the baseline scenario.**
5. **quantification of GHG emission reductions or removals.**
6. **monitoring practices.**

Yes

https://verra.org/methodologies-main/#vcs-methodologies

All approved methodologies are listed here: https://verra.org/methodologies-main/#vcs-methodologies

Each methodology approved in the program addresses the elements listed above.

The **VCS Methodology Requirements document** outlines provisions to address the listed essential methodology components: https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

The VCS Methodology Requirements document outlines provisions to address the listed essential methodology components:

For more information, consult these sections of the VCS Methodology Requirements document:

1) applicability or eligibility criteria: **VCS Methodology Requirements, Section 3.2 (Applicability Conditions)**

2) determination of the accounting boundary: **VCS Methodology Requirements, Section 3.3 (Project Boundary)**

3) determination of additionality (to the extent this is not covered in other general carbon crediting program provisions): **VCS Methodology Requirements, Section 3.5 (Additionality)**

4) establishing the baseline scenario: **VCS Methodology Requirements, Section 3.4 (Baseline Scenario); VCS Methodology Requirements, Section 3.6;**

5) quantification of GHG emission reductions or removals: **VCS Methodology Requirements, Section 3.8 (Quantification of Emission Reductions and Removals)**

6) monitoring practices: **VCS Methodology Requirements, Section 3.9 (Monitoring)**

Additional cross cutting program level requirements on these topics are provided in the VCS Standard (https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf)

3.12 Project Boundary

3.13 Baseline Scenario

3.14 Additionality

3.15 Quantification of GHG emission reductions and removals

3.16 Monitoring

c) Confirm that your organisation requires that, prior to approval, new methodologies and major revisions of existing methodologies undergo review by a group of independent experts and a public stakeholder consultation.

Yes

https://verra.org/wp-content/uploads/2023/08/Methodology-Development-and-Review-Process-v4.3-1.pdf

Prior to approval, Verra has a process for new methodologies and major revisions of existing methodologies to undergo review by a group of independent experts, as addressed by the VVB review,and a public stakeholder consultation. This is outlined in the VCS Methodology Development and Review Process document https://verra.org/wp-content/uploads/2023/08/Methodology-Development-and-Review-Process-v4.3-1.pdf

VCS Methodology Development and Review Process, Section 2.1.3, 2.1.4, 3.5.1, 3.5.2 outline, the process for new methodologies and major revisions of existing methodologies to undergo review by independent experts:

- "2.1.3 Verra may request that the developer establishes a working group or engages with third-party experts to provide technical inputs while developing the concept note and/or methodology.

- 2.1.4 Verra may consult with independent experts to further enhance the review process in addition to the Verra review and validation/verification body assessment where Verra deems that it would increase the quality of the methodology.

- 3.5.1 Verra publishes a request for proposals to conduct the methodology assessment. The criteria for eligible validation/verification bodies are set out in Section 5 of the VCS Program Guide. Upon receipt of any proposals, Verra narrows the pool of eligible validation/verification bodies to those with the most relevant expertise and experience.

- 3.5.2 Verra forwards the remaining proposals to the developer, and the developer shall select one of them. The developer signs an agreement with the validation/verification body for the assessment and pays the validation/verification body, which may include compensation for subject-matter experts to participate in the validation/verification body assessment. The developer's agreement with the validation/verification body shall satisfy the requirements indicated in the VCS Methodology Submission Form & Agreement."

VCS Methodology Development and Review Process, Section 3.4 outlines the process for new methodologies and major revisions of existing methodologies to undergo public stakeholder consultation:

"3.4 Step 4: Public Stakeholder Consultation

- 3.4.1 Verra posts the methodology on the Verra website for 30 days to invite public comment. Where appropriate, Verra may establish a longer period (e.g., for methodologies of higher complexity). Verra may host a webinar to provide an overview of the methodology. Any comments shall be submitted to Verra using the template published with the draft methodology. Respondents shall provide their name, organization, country, and email address. If the respondent wishes to remain anonymous, this shall be indicated in their submission of comments.

- 3.4.2 At the end of the public comment period, Verra consolidates the comments and provides them to the developer. The developer shall take due account of such comments, which means it shall either update the methodology to address the comment, provide clarification, or demonstrate the insignificance or irrelevance of the comments. The developer shall include responses to all consolidated comments and submit them for validation/verification body assessment alongside the methodology documentation (Step 5).

- 3.4.3 Where significant changes to the methodology are made after the first public stakeholder consultation, Verra may choose to conduct a second public stakeholder consultation."

d) Confirm that your organisation has procedures to review, suspend and/or withdraw the use of methodologies where the carbon-crediting program has determined, based on evidence, that GHG emission reductions or removals are being overestimated or that additionality might not be ensured.

Yes

https://verra.org/wp-content/uploads/2023/08/Methodology-Development-and-Review-Process-v4.3-1.pdf

Verra has procedures to review, suspend and/or withdraw the use of methodologies where Verra has determined, based on evidence, that GHG emission reductions or removals are being overestimated or that additionality might not be ensured. This is outlined in the VCS Methodology Development and Review Process document https://verra.org/wp-content/uploads/2023/08/Methodology-Development-and-Review-Process-v4.3-1.pdf

VCS Methodology Development and Review Process, Section 5.1-5.3 outlines the process to review, suspend and/or withdraw the use of methodologies. Please reference Section 3.5 in its entirety, however the following are important summary components:

"5.1 Trigger for Review

- … 5.1.3 At any point in time, a review may be triggered where a validation/verification body, project proponent, another stakeholder, or Verra identifies an issue with a methodology, tool or module, such as:

- 1) Material inconsistency with a VCS Program rule or requirement (e.g., an inconsistency that may lead to a material difference in the quantification of GHG emission reductions or removals by projects applying the methodology);

- 2) General scientific or technical developments in a specific sector; or

- 3) Any other well-founded concerns about a methodology

5.2 Procedure for Review

- 5.2.1 The review of the methodology and any relevant issue that triggered the review is undertaken by Verra. Verra may request input from stakeholders including the developers of previous methodology versions, a validation/verification body, and appropriately qualified external experts.

- 5.2.2 At any point during the review, the methodology may be temporarily inactivated or excluded from the VCS Program while the review is completed if a well-founded concern exists.'

5.3 Outcome of Review

- … 5.3.6 Verra may also permanently inactivate or exclude a methodology where Verra deems a revision is unlikely to resolve the issue successfully. Permanently inactivated or excluded methodologies cannot be reactivated or reintroduced to the VCS Program.

- Section 5.3.7 outlines when additionality shall be re-determined as part of the review of a methodology.

Section 4.1.2 outlines what constitutes a major revision:

- "1) Major revision: Revisions with significant impact on the structure and content of the methodology, methodological approach, the scope of the methodology, project boundary, applicability conditions, baseline scenario, or additionality approach. Examples include, among others, expansion of the scope to different project activities, adaptation of a standardized method, or modifications to the GHG quantification approach. A major revision requires Verra review, public stakeholder consultation, validation/verification body assessment, and final Verra review."

5.2   Requirements for Quantifying GHG Emission Reductions or Removals

a) In addition to CORSIA requirements, confirm that your organization does:

1) clearly define a carbon credit as one metric tonne of CO2 equivalent of GHG emission reductions or removals.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

VCS Standard, v4.5, Section 5.15.3 clearly defines a carbon credit as one metric tonne of CO2 equivalent of GHG emission reductions or removals:

Section 5.15.3: "Metric tonnes shall be used as the unit of measure and the quantity of each type of GHG shall be converted to tonnes of CO2 equivalent (CO2e)."

See also: https://verra.org/programs/verified-carbon-standard/verified-carbon-units-vcus/

2) disclose the global warming potential (GWP) values used to calculate the CO2 equivalence.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

VCS Standard, v4.5, Section 5.15.4 outlines global warming potential (GWP) values used to calculate the CO2 equivalence:

"All reductions and removals shall be converted to CO2e using 100-year global warming potential (GWP) values.

For reductions and removals occurring on or after 1 January 2021, all ex-ante estimates and ex-post calculations shall be converted to CO2e using GWP values from the IPCC Fifth Assessment Report (AR5).9 See Table 2 for the GWP values for methane and nitrous oxide established in AR5.10 For reductions and removals occurring on or before 31 December 2020, all ex-ante estimates and ex-post calculations may be converted to CO2e using either the GWP values from the IPCC Fourth Assessment Report (AR4) or those from AR5.

Projects that complete validation on or before 31 July 2021 may use GWP values from AR4 for ex-ante emission reduction estimates, though such projects shall use GWP values from AR5 for ex-post calculations."

3) define the length of crediting periods, including the total length of combined crediting periods

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

VCS Standard, v4.5, Section 3.9 (inclusive) defines the length of crediting periods, including the total length of combined crediting periods. Some important details include:

"3.9.1 The total project crediting period shall be either seven years (twice renewable for a total of up to 21 years) or ten years fixed, except for AFOLU and GCS projects as defined below and in the GCS Requirements respectively."

See the remainder of Section 3.9.2 and 3.9.3 for more information.

https://verra.org/wp-content/uploads/2022/12/GCS-Requirements-v4.0-FINAL.pdf

The project crediting period for a GCS project is seven years, five times renewable for a total of up to 42 years.

4) provide guidance on steps and requirements for renewal of the crediting periods. Any renewal of the crediting period shall include a reassessment of the baseline scenario, including whether the conditions and barriers at the start of the mitigation activity still prevail, and an update of relevant parameters used to calculate emissions reductions and removals.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard, v4.5, Section 3.9.8 specifies the steps and requirements for renewal of the crediting periods. Some important details include:

Renewal of Project Crediting Period: Section 3.9.8

The following applies with respect to the renewal of a project crediting period under the VCS Program:

1) A full reassessment of additionality is not required when renewing the project crediting period unless otherwise specified in the methodology. However, regulatory surplus shall be demonstrated in accordance with the requirements set out in the VCS Program rules and the project description shall be updated accordingly.

2) The validity of the original baseline scenario shall be demonstrated, or where invalid, a new baseline scenario shall be determined when renewing the project crediting period as follows:

   a) The validity of the original baseline scenario shall be assessed. Such assessment shall include an evaluation of the impact of new relevant national and/or sectoral policies and circumstances on the validity of the baseline scenario.

   b) Where it is determined that the original baseline scenario is still valid, the GHG emissions associated with the original baseline scenario shall be reassessed using the latest version of the CDM Tool to assess the validity of the original/current baseline and to update the baseline at the renewal of a crediting period.

   c) Where it is determined that the original baseline scenario is no longer valid, the current baseline scenario shall be established in accordance with the VCS Program rules.

3) The project description, containing updated information with respect to the baseline, the estimated reductions or removals and the monitoring plan, shall be submitted for validation. Such updates shall be based upon the latest approved version of the methodology or its replacement. Where the project does not meet the requirements of the latest approved version of the methodology or its replacement, the project proponent shall select another applicable approved methodology (which may be a new methodology or methodology revision it has had approved via the methodology development and review process), or shall apply a methodology deviation (where a methodology deviation is appropriate). Failing this, the project shall not be eligible for renewal of its project crediting period.

4) The updated project description shall be validated in accordance with the VCS Program rules. In addition, the project shall be validated against the (current) scope of the VCS Program. Such validation report shall be issued after the end of the (previous) project crediting period and within two years after the end of the (previous) project crediting period. Additional time is granted for projects to complete such validation where they are switching to a new VCS methodology (new VCS methodology in this context has the same meaning as set out in Section 3.8.1) when renewing the project crediting period. Specifically, projects switching to a new VCS methodology and completing such validation within one year of the approval of the methodology by Verra may complete such validation within three years of the end of the (previous) project crediting period. Where a project crediting period is not renewed within these timelines the project crediting period shall end and the project shall be ineligible for further crediting.

5) assess the overall uncertainty of emission reductions or removals associated with an activity type and/or require that the mitigation activity proponent assess the overall uncertainty in accordance with an approved methodology. In estimating overall uncertainty all causes of uncertainty shall be considered, including assumptions (e.g., baseline scenario), estimation equations or models, parameters (e.g., representativeness of default values), and measurements (e.g., the accuracy of measurement methods). The overall uncertainty shall be assessed as the combined uncertainty from individual causes.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

Details to assess the overall uncertainty of emission reductions or removals associated with an activity type and require that the mitigation activity proponent assess the overall uncertainty in accordance with an approved methodology principles are found in the VCS Methodology Requirements document, Section 2.4, 2.5: https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

- Section 2.4: "Methods used for estimating random error shall be based on recognized statistical approaches such as those described in the latest IPCC guidance." See section for more information.

- Section 2.5 outlines principles for Models, Default Factors and Proxies, including:

- "Where methodologies mandate the use of specific models to simulate processes that generate GHG emissions (i.e., the project proponent is not permitted to use other models), the following applies, given the note below:

  1) Models shall be publicly available, though not necessarily free of charge, from a reputable and recognized source (e.g., the model developer's website, IPCC, or government agency).

  2) Model parameters shall be determined based upon studies by appropriately qualified experts that identify the parameters as important drivers of the model output variable(s).

  3) Models shall have been appropriately reviewed and tested (e.g., ground-truthed using empirical data or results compared against results of similar models) by a recognized, competent organization, or an appropriate peer review group.

  4) All plausible sources of model uncertainty, such as structural uncertainty or parameter uncertainty, shall be assessed using recognized statistical approaches such as those described in 2019 Refinement to the 2006 IPCC Guidelines for National GHG Inventories, Volume 1, Chapter 3.

  5) Models shall have comprehensive and appropriate requirements for estimating uncertainty in keeping with IPCC or other appropriate guidance, and the model shall be calibrated by parameters such as geographic location and local climate data.

  6) Models shall apply conservative factors to discount for model uncertainty (in accordance with the requirements set out in Section 2.1.3) and shall use conservative assumptions and parameters that are likely to underestimate, rather than overestimate, the reductions or removals."

- See the rest of Section 2.5 for more information.

- Verra also has a process for assessing uncertainty for new methodologies as outlined in the VCS Methodology Development and Review Process document (Section 6.1.3, #15): https://verra.org/wp-content/uploads/2023/08/Methodology-Development-and-Review-Process-v4.3-1.pdf

6) have a systematic approach to ensuring the conservativeness of quantification methodologies it approves for use.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

Page 9, Section 2.3 GHG-Information Principles:

"Conservativeness - Use conservative assumptions, values and procedures to ensure that net GHG emission reductions or removals are not overestimated."

Details on the systematic approach to ensure the conservativeness of quantification methodologies Verra approves for use is found in the VCS Methodology Requirements document, Section 2.4: https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

Section 2.4:

- "Methodologies must be designed to reduce systematic and random error as far as practical. Where relevant, methodologies must set out procedures for projects to estimate residual random error according to recognized statistical approaches, and to apply conservativeness deductions to reduce the risk of overestimating reductions and removals due to random error."

- 2.4.4 " Where it is likely that the half-width of the two-sided 90 percent confidence interval for estimating reductions and removals could exceed 10 percent of the estimated value, methodologies shall…

- 2) Set out a procedure to calculate an appropriate conservativeness deduction. The deductions shall usually be applied to estimates of reductions and removals but may alternatively be applied to estimates of emissions, activity data, and emission factors in cases where this is not practical.

- 3) The methodology shall include procedures for calculation and application of a conservativeness deduction as follows… (see formulas on page 12 for more information)."

Note, VCS Standard, v4.5, Section 2.2.1 (https://verra.org/documents/vcs-standard-v4-5/) outlines the VCS Program's principles that include:

"Conservativeness: Use conservative assumptions, values, and procedures to ensure that GHG emission reductions or carbon dioxide removals are not overestimated."

Verra also requires that new methodologies assess the principles of conservative estimated GHG emission reductions and removals, as outlined in the VCS Methodology Development and Review Process document (Section 6.1.3, #12): https://verra.org/wp-content/uploads/2023/08/Methodology-Development-and-Review-Process-v4.3-1.pdf

- 12) Estimated GHG emission reductions and removals: Assessment of whether the approach for calculating the GHG emission reductions and carbon dioxide removals of the project is appropriate, adequate, conservative and in conformance with VCS Program rules and requirements

7) require in its program documents that existing government policies and legal requirements that lower GHG emissions (e.g., feed-in tariffs for renewable energy, minimum product efficiency standards, air quality requirements, or carbon taxes) be included when determining the baseline emissions. Your organisation may have provisions to consider the level of enforcement of such policies and legal requirements as well as any associated grace periods.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

Details on how existing government policies and legal requirements that lower GHG emissions (e.g., feed-in tariffs for renewable energy, minimum product efficiency standards, air quality requirements, or carbon taxes) are included when determining the baseline emissions is found in the VCS Methodology Requirements document: https://verra.org/wp-content/uploads/2023/08/VCS-Methodology-Requirements-v4.4-updated-4-Oct-2023.pdf

Please see Section 3.4.1:

- "Methodologies using a project method shall establish criteria and procedures for identifying alternative baseline scenarios and determining the most plausible scenario, taking into account the following:

- 5) Existing and upcoming government policies and legal requirements such as minimum product efficiency standards, air quality requirements, or carbon taxes."

Please see the following definitions in the VCS Program Definitions document: https://verra.org/wp-content/uploads/2023/08/VCS-Program-Definitions-v4.4-updated-4-Oct-2023.pdf

5.3   Ex-Post Determination of Emission Reductions or Removals

a) Carbon credits that are issued ex-ante are not CCP eligible. If your organisation supports both ex-ante and ex-post issuance, confirm it has procedures in place to transparently identify units that are issued ex-post and are thus eligible under the ICVCM.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

VCUs represent emissions reductions or removals that have been quantified and verified ex post.

The VCS Standard specifies:

Section 2.3.1:

"Verified Carbon Units (VCUs) are not issued under the VCS Program for GHG emission reductions or carbon dioxide removals that have not been verified."

Section 4.1.25

"Verification opinions shall state the volume of GHG emission reductions and carbon dioxide removals generated during the monitoring period that have been verified. The verification opinion shall contain separate statements for reductions and removals where these are reported separately in accordance with the applied methodology. For AFOLU projects, the verification opinion shall also include the non-permanence risk rating, leakage emissions, and number of reductions and removals eligible to be issued as VCUs."

6.1   No Double Issuance (Double Registration)

a) Confirm your organisation has provisions in place to:

1) prevent the registration of any mitigation activity that has been registered under another carbon-crediting program and is still active under that program; and

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) prohibits reductions and removals from being double counted within or across GHG programs, including where projects are registered under both the VCS Program and another GHG program. This requirement under the VCS Standard is equivalent to CCP criterion 6.1 a) 1).

"3.23.1 Project proponents shall not seek credit for the same GHG emission reduction and carbon dioxide removal under the VCS Program and another GHG program. Projects issuing GHG credits from different time periods under the VCS Program and another GHG program shall also conform with the rules and requirements in the Registration and Issuance Process."

2) ensure that it does not issue carbon credits for GHG emission reductions or removals where another program has issued credits to the same mitigation activity and/or for the same GHG emission reductions or removals and has not cancelled those credits for the purpose of avoiding double issuance.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) prohibits reductions and removals from being double counted within or across GHG programs, including where projects are registered under both the VCS Program and another GHG program, thus meeting requirements equivalent to CCP criterion 6.1 a) 2):

"3.23.2 Where project proponents have received, or are seeking credit for reductions and removals from a project activity under the VCS Program and another GHG program, the following information about the other GHG program shall be provided to the validation/verification body and Verra:

1) Name and contact information of administrator,

2) Details of participation under the program,

3) Details of the vintage period(s), volume(s), serial number(s), and all other relevant identification information for emissions reductions and removals included,

4) Evidence that the same reductions and removals seeking credit under the VCS Program have not been and will not be counted, used, or credited under the GHG program, or evidence confirming the cancellation and non-use of credits issued under the other GHG program. Such evidence may include:

a) A signed letter from the program administrator stating that the same reductions or removals have not and will not be otherwise counted, used, or credited under the other GHG program;

or

(b) A signed letter from the program administrator confirming the cancellation and non-use of GHG program credits for the same reductions or removals seeking credit under the VCS Program."

6.2   No Double Use

a) Confirm your organisation has registry provisions that prevent the further transfer, retirement or cancellation of a carbon credit once it has been cancelled or retired.

Yes

https://verra.org/wp-content/uploads/Verra-Registry-TOU-September-2021_FINAL.pdf

The Verra registry Terms of use **prevent the further transfer, retirement or cancellation of a carbon credit once it has been cancelled or retired.**

8.1 The User may request that Verra cancel or retire Instruments in accordance with the relevant Verra Program Rules and Requirements and the procedures set out by Verra.

8.2 The User acknowledges and agrees that, if the User wishes Verra to cancel or retire Instruments, upon such cancellation or retirement:

(a) all legal and beneficial title and interests in such Instruments will be extinguished; and

(b) neither Verra, the User, nor any other person with Legal or Beneficial Ownership Rights will have any further rights to take the benefit of such Instruments nor the underlying Environmental Benefits corresponding to such Instruments.

8.3 For the avoidance of doubt, the extinguishment of legal and beneficial title and interests in the Instrument does not prevent the User (or any other person with Legal or Beneficial Ownership Rights on whose behalf the Instrument is cancelled or retired) from making offsetting claims corresponding to the Instrument cancelled or retired.

8.4 Subject to Clauses 11.4(n) and 11.4(o), any instruction by the User to Verra to cancel or retire Instruments in accordance with this Clause 8 is irrevocable, and the User acknowledges that any such instruction will not be reversed.

8.5 Verra acknowledges and agrees that, once the User has complied with this Clause 8 and Verra has cancelled or retired the Instruments, Verra will not take any action to exercise or purport to exercise any right or interest, or deal with or otherwise use, the cancelled or retired Instruments or the underlying Environmental Benefits corresponding to such Instruments and considers that no person has any further rights to take the benefit of the cancelled or retired Instruments or the underlying Environmental Benefits corresponding to such Instruments.

...

11.4 User acknowledges and agrees that Verra is merely providing a service and, accordingly, acknowledges and agrees that:

...

(n) Verra has the authority and power to reverse any transaction or movement of Instruments upon instruction from a relevant Scheme Regulator, Financial Market Settlement System or any other Government Authority

without the authorization of the User. If a transaction or movement of Instruments is reversed in accordance with this Clause 11.4(n), the User will have no claim against Verra for any remedy;

(o) the User has the right and the obligation to instruct Verra to correct any incorrect or inaccurate information held in the Verra Registry and inform Verra in writing of any changes to that information

C – SUSTAINABLE DEVELOPMENT

7.1   Assessment and Management of Environmental and Social Risks

a) In addition to CORSIA requirements relating to Safeguards System and Sustainable Development Criteria, confirm your organisation requires mitigation activity proponents to:

1) abide by national and local laws, objectives, programs and regulations and where relevant, international conventions and agreements.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) specifies in section 3.1.4 that "Projects and the implementation of project activities shall not lead to the violation of any applicable law, regardless of whether or not the law is enforced."

2) assess associated risks of negative environmental and social impacts with regard to the safeguards contained in criteria 7.2 to 7.8 (inclusive), taking into account the scope and scale of the mitigation activity.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) specifies in section 3.19.1 that "Project proponents shall identify any potential negative impacts of project activities and design and implement measures to mitigate them". The remainder of section 3.19 elaborates specific requirements for safeguards which are consistent with CCP criteria 7.2 to 7.8.

Concerning risks to stakeholders, section 3.19.2 requires project proponents to "assess the risk of any negative environmental and socio-economic impacts as a result of project activities. Where the assessment identifies any such risks, the project proponent shall disclose the risks and design and implement steps to mitigate them. Any such impact and mitigation measures shall be reported in the applicable project document at validation and each verification."

Section 3.19.5 further specifies that "The project shall be designed and implemented to avoid trade-offs and mitigate the identified risks to local stakeholders."

Section 3.19.6 specifies that "The management teams involved in the project shall have expertise in and prior experience implementing similar carbon or land management projects, and community engagement at the project scale and in the local context. Where relevant expertise and experience is lacking, the project proponent shall either demonstrate that they have partnered with other organizations with the relevant experience or have a recruitment strategy to fill the identified gaps."

3) ensures FPIC processes for IPs and LCs, where applicable; and conduct stakeholder consultations, including local stakeholders as part of project design and implementation in a manner that is inclusive, culturally appropriate, and respectful of local knowledge, take these consultations into account and respond to local stakeholders' views.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) specifies in section 3.18 extensive requirements on stakeholder engagement. These include, in section 3.18.1, that "the project proponent shall conduct a thorough assessment of the stakeholders [(a person, entity or stakeholder group)] that will be impacted by the project activities. In identifying stakeholders, the project proponent must consider the significance of user populations and how deeply affected they may be by the project activities …". This entails the identification of stakeholders and rights to territories and resources; a description of social, economic and cultural diversity; the location of stakeholders, Indigenous Peoples (IPs), local communities (LCs), customary rights holders, and areas outside the project

area that are predicted to be impacted by the project; and any barriers to stakeholder engagement such as literacy and location or connection to electricity and how the project proponent will address such barriers.

Sections 3.18.2-3.18.6 specify the required conduct of stakeholder engagement and consultation, as well as account to be taken of input received, possible updates to project design, grievance redress procedures, mechanisms for ongoing communication with stakeholders during project implementation, and information to be communicated prior to each validation/verification event.

Section 3.18.8 address FPIC specifically. It specifies that "The project may affect property rights only if free, prior, and informed consent is obtained from those concerned, including IPs, LCs, and customary rights holders, and a transparent agreement is reached that includes provisions for just and fair compensation. In the event there are any ongoing or unresolved conflicts over property rights, usage, or resources, the project shall undertake no activity that could exacerbate the conflict or influence the outcome of an unresolved dispute. This section further specifies minimum information that is to be disclosed by the project participant prior to an agreement being reached, inter alia a "preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle".

b) Where, pursuant to 7.1 a) 2), the mitigation activity proponents have assessed that the mitigation activity poses risks of negative environmental and/or social impacts with regard to any of criteria 7.2 - 7.8 (inclusive) confirm your organisation requires the mitigation activity proponents to:

1) include measures, commensurate with the identified risks, to minimise and address such negative environmental and/or social impacts, in validated design documents prior to registration.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted above, the VCS Standard v4.5 (see above URL) specifies in section 3.19.1 that project proponents shall identify any potential negative impacts and implement measures to mitigate them.

The VCS Standard also specifies in section 3.5.1 that the project proponent shall use the VCS Project Description Template available on the Verra website (or an approved GHG program project description template where the project is registered under an approved GHG program, as appropriate) and that the project proponent shall adhere to all instructional text within the template.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

Section 2 of the template on "safeguards and stakeholder engagement" requires project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts. Information is given in relation to, inter alia, free, prior and informed consent (FPIC); risks to stakeholders and the environment; respect for human rights and equity; and ecosystem health.

2) include information on the measures implemented pursuant to 1), commensurate with the identified risks in the monitoring report.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted above, the VCS Standard v4.5 (see above URL) specifies in section 3.19.1 that project proponents shall identify any potential negative impacts and implement measures to mitigate them.

The VCS Standard also specifies in section 3.5.1 that the project proponent shall use the VCS Project Description Template available on the Verra website (or an approved GHG program project description template where the project is registered under an approved GHG program, as appropriate) and that the project proponent shall adhere to all instructional text within the template.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

Section 2 of the template on "safeguards and stakeholder engagement" requires project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts. Information is given in relation to, inter alia, free, prior and informed consent (FPIC); risks to stakeholders and the environment; respect for human rights and equity; and ecosystem health.

7.2   Labour Rights and Working Conditions

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) provides safe and healthy working conditions for employees.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.7 The project proponent shall identify any risks related to working conditions as a result of project activities and shall design and implement mitigation measures to provide safe and healthy working conditions for employees.

3.19.8 The project proponent shall identify any risks related to the safety of women and girls in the local community due to project activities and shall design and implement mitigation measures that protect and appropriately respond to harm to women and girls in the local community.

3.19.9 The project proponent shall identify any risks as a result of project activities to children, and minority and marginalized groups in the local community, and shall design and implement mitigation measures to protect children, and minority and marginalized groups against and appropriately respond to harm in the local community.

3.19.16 The project proponent shall respect human rights as set out in the International Labour Organization's Declaration on Fundamental Principals and Rights at Work as part of project design and implementation."

2) provides fair treatment of all employees, avoiding discrimination and ensuring equal opportunities.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.11 The project proponent shall ensure that no discrimination or sexual harassment occurs in the project design or implementation.

3.19.13 The project proponent shall provide equal opportunities in the context of gender for employment and participation in consultation and project activities.

3.19.14 The proponent shall provide equal pay for equal work in project design and implementation.

3.19.15 The project proponent shall prohibit the use of forced labor, child labor, or victims of human trafficking in project design and implementation.

3.19.16 The project proponent shall respect human rights as set out in the International Labour Organization's Declaration on Fundamental Principals and Rights at Work as part of project design and implementation."

3) prohibits the use of forced labour, child labour, or trafficked persons, and protects contracted workers employed by third parties.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.15 The project proponent shall prohibit the use of forced labor, child labor, or victims of human trafficking in project design and implementation.

3.19.16 The project proponent shall respect human rights as set out in the International Labour Organization's Declaration on Fundamental Principals and Rights at Work as part of project design and implementation."

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted in our response to CCP criterion 7.1 b) 2), the VCS Standard v4.5 (see above URL) and the VCS Project Description Template (in particular section 2) require project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

7.3   Resource Efficiency and Pollution Prevention

a) Your organisation requires mitigation activity proponents to ensure that the mitigation activity minimises:

1. pollutant emissions to air
2. pollutant discharges to water, noise and vibration
3. generation of waste and release of hazardous materials, chemical pesticides and fertilisers

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.10 The project proponent shall identify and mitigate any impacts caused by pollutant emissions to air, discharges to water, noise and vibration, the generation of waste, or the release of hazardous materials as a result of project activities."

The specificity of risks to consider is elaborated further in section 2.4 of the VCS Project Description Template v4.3 which requires the identification of risks and mitigation steps in relation to the use of fertilisers. This is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

1. whether the mitigation activity results in pollutant emissions to air, pollutant discharges to water, noise and vibration, the generation of waste, the release of hazardous materials, chemical pesticides and fertilisers.

2. where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1).

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted in our response to CCP criterion 7.1 b) 2), the VCS Standard v4.5 (see above URL) and the VCS Project Description Template (in particular section 2) require project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

7.4 Land Acquisition and Involuntary Resettlement

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity avoids, or where this is not feasible, minimises forced physical and/or economic displacement.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.19 The project proponent shall recognize, respect, and support IPs', LCs', and customary rights holders' property rights and where feasible, take measures to help secure rights.

3.19.20 The project shall not encroach on private, stakeholder, or government property or relocate people off their lands without prior consent and appropriate compensation.

3.19.21 The project shall not lead to forced physical or economic displacement.

3.19.22 Where the project activity impacts property rights, usage, or resources, the project shall include a benefit-sharing agreement between affected stakeholder groups and the project proponent. Such an agreement shall be: 1) Appropriate to the local context; 2) Consistent with applicable national rules and regulations, and international human rights laws and standards; 3) Consistent with customary rights, to the maximum extent feasible; 4) Agreed upon by IPs, LCs, and legitimate customary rights holders; 5) Shared in a culturally appropriate manner.

3.19.23 IPs, LCs, and customary rights holders shall have access to the benefit sharing agreement.

3.19.24 The project proponent shall provide, at minimum, evidence and/or a draft of the benefit sharing agreement to the validation/verification body at validation. The implemented benefit sharing agreement shall be provided to the validation/verification body at each verification."

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

1. whether the mitigation activity results in forced physical and/or economic displacement;

2. where the mitigation activity results in the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1)

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted in our response to CCP criterion 7.1 b) 2), the VCS Standard v4.5 (see above URL) and the VCS Project Description Template (in particular section 2) require project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

7.5 Biodiversity Conservation

a) **Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:**

1) avoids, or where this is not feasible, minimises negative impacts on terrestrial and marine biodiversity and ecosystems.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.25 The project shall not have negative impacts on biodiversity and ecosystems. Projects shall identify any risks to ecosystems due to project activities and implement measures to ensure no negative impacts on ecosystems.

3.19.26 Projects in, or adjacent to, habitats for rare, threatened, or endangered species shall demonstrate that they will not adversely impact such habitats.

3.19.27 For projects that include planting or introduction of species:

1) The project shall not introduce any invasive species or allow an invasive species to thrive as part of project activities. Project proponents shall identify invasive species using, in order of priority, local, regional, or global invasive species registries. In instances where no local or regional registries exist, the project proponent may use a locally applicable information source other than a registry and shall provide the source used in the project documents.

2) The project shall not use any species in the project activities that threaten the existence of endangered species.

3) For ARR and WRC activities the project shall not introduce non-native monocultures.

3.19.28 Activities that convert natural non-degraded ecosystems, or drain or degrade the hydrological functions of a natural, non-degraded ecosystem, are not eligible under the VCS Program."

2) protects the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.26 Projects in, or adjacent to, habitats for rare, threatened, or endangered species shall demonstrate that they will not adversely impact such habitats.

3.19.27 For projects that include planting or introduction of species:

1) The project shall not introduce any invasive species or allow an invasive species to thrive as part of project activities. Project proponents shall identify invasive species using, in order of priority, local, regional, or global invasive species registries. In instances where no local or regional registries exist, the project proponent may use a locally applicable information source other than a registry and shall provide the source used in the project documents.

2) The project shall not use any species in the project activities that threaten the existence of endangered species.

3) For ARR and WRC activities the project shall not introduce non-native monocultures."

3) does not convert natural forests, grasslands, wetlands, or high conservation value habitats.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.28 Activities that convert natural non-degraded ecosystems, or drain or degrade the hydrological functions of a natural, non-degraded ecosystem, are not eligible under the VCS Program.

1) Evidence shall be provided in the project description that any ARR, ALM, WRC or ACoGS project areas were not cleared of existing natural non-degraded ecosystems due to the project activity (e.g., evidence indicating that clearing occurred in the pre-project land use due to natural disasters such as hurricanes or floods).

2) Such proof is not required where such clearing or conversion took place at least 10 years prior to the proposed project start date, or where the dominant land cover is an invasive species and threatening ecosystem health as demonstrated using the Global Invasive Species Database and supporting documents such as evidence from peer reviewed literature or expert judgement.

3) Where the project restores degraded lands through ARR and WRC activities, the project proponent shall demonstrate that the project activity restores the project area to a native ecosystem type represented in the same ecoregion as the project. Such demonstration shall use remote sensing, aerial imagery, modeling, or other relevant literature."

4) minimises soil degradation and soil erosion.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.25 The project shall not have negative impacts on biodiversity and ecosystems. Projects shall identify any risks to ecosystems due to project activities and implement measures to ensure no negative impacts on ecosystems."

The specificity of risks to consider is elaborated further in section 2.4 of the VCS Project Description Template v4.3 which requires the identification of risks and mitigation steps in relation to soil degradation and erosion. This is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

Furthermore, section 3.2.13 requires that "WRC projects shall ensure that the permanence of their soil carbon stock will be maintained by demonstrating that project areas are not subject to erosion, migration, or inundation".

5) minimises water consumption and stress in the mitigation activity.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.25 The project shall not have negative impacts on biodiversity and ecosystems. Projects shall identify any risks to ecosystems due to project activities and implement measures to ensure no negative impacts on ecosystems."

The specificity of risks to consider is elaborated further in section 2.4 of the VCS Project Description Template v4.3 which requires the identification of risks and mitigation steps in relation to water consumption and stress. This is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

1. **whether the mitigation activity has negative impacts on terrestrial and marine biodiversity and ecosystems, on habitats of rare, threatened, and endangered species, on soil degradation and soil erosion, and on water consumption and water stress.**

2. **where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1).**

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted in our response to CCP criterion 7.1 b) 2), the VCS Standard v4.5 (see above URL) and the VCS Project Description Template (in particular section 2) require project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

7.6 Indigenous Peoples, Local Communities and Cultural Heritage

a) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) recognises, respects and promotes the protection of the rights of IPs & LCs in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous and Tribal Peoples.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.17 The project proponent shall identify IPs, LCs, and customary rights holders [including in areas outside the project area that are predicted to be impacted by the project] and recognize, respect, and promote the protection of the rights of said groups in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous People and ILO Convention 169 on Indigenous and Tribal Peoples, in project design and implementation."

2) identifies the rights-holders possibly affected by the mitigation activity (including customary rights of local rights holders).

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.17 The project proponent shall identify IPs, LCs, and customary rights holders [including in areas outside the project area that are predicted to be impacted by the project] and recognize, respect, and promote the protection of the rights of said groups in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous People and ILO Convention 169 on Indigenous and Tribal Peoples, in project design and implementation."

3) when relevant to circumstances, has applied the FPIC process.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires that the FPIC process be followed:

"3.18.7 The project proponent shall respect stakeholders' rights to participate in and consent to consultation as part of project design and implementation.

3.18.8 The project may affect property rights only if free, prior, and informed consent 14 is obtained from those concerned, including IPs, LCs, and customary rights holders, and a transparent agreement is reached that includes provisions for just and fair compensation. In the event there are any ongoing or unresolved conflicts over property rights, usage, or resources, the project shall undertake no activity that could exacerbate the conflict or influence the outcome of an unresolved dispute. Prior to establishing such an agreement, the project proponent shall disclose, at a minimum, the following information:

1) The nature, size, pace, reversibility, and scope of any proposed project or activity;

2) The reason(s) or purpose of the project and/or activity;

3) The duration of the project activities;

4) The locations that will be affected;

5) A preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle;

6) Personnel likely to be involved in the execution of the proposed project (including Indigenous Peoples, private sector staff, research institutions, government employees and others)

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

3.19.17 The project proponent shall identify IPs, LCs, and customary rights holders as set out in Section 3.18.1 above, and recognize, respect, and promote the protection of the rights of said groups in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous People and ILO Convention 169 on Indigenous and Tribal Peoples, in project design and implementation.

3.19.18 The project proponent shall preserve and protect cultural heritage consistent with IPs', LCs' and customary rights holders' practices or UNESCO Cultural Heritage conventions in project design and implementation."

4) does not force eviction or any physical or economic displacement of IPs & LCs, including through access restrictions to lands, territories, or resources, unless agreed upon with IPs & LCs during the FPIC process.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.19 The project proponent shall recognize, respect, and support IPs', LCs', and customary rights holders' property rights and where feasible, take measures to help secure rights.

3.19.20 The project shall not encroach on private, stakeholder, or government property or relocate people off their lands without prior consent and appropriate compensation.

3.19.21 The project shall not lead to forced physical or economic displacement.

3.19.22 Where the project activity impacts property rights, usage, or resources, the project shall include a benefit-sharing agreement between affected stakeholder groups and the project proponent. Such an agreement shall be:

1) Appropriate to the local context.
2) Consistent with applicable national rules and regulations, and international human rights laws and standards.
3) Consistent with customary rights, to the maximum extent feasible
4) Agreed upon by IPs, LCs, and legitimate customary rights holders.
5) Shared in a culturally appropriate manner."

5) preserves and protects cultural heritage consistent with IPs & LCs protocols/rules/plans on the management of cultural heritage or UNESCO Cultural Heritage conventions.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures;:

"3.19.18 The project proponent shall preserve and protect cultural heritage consistent with IPs', LCs' and customary rights holders' practices or UNESCO Cultural Heritage conventions in project design and implementation."

b) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted in our response to CCP criterion 7.1 b) 2), the VCS Standard v4.5 (see above URL) and the VCS Project Description Template (in particular section 2) require project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement

and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

7.7 Respect for Human Rights, Stakeholder Engagement

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) avoids discrimination and respects human rights.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.11 The project proponent shall ensure that no discrimination or sexual harassment occurs in the project design or implementation.

3.19.12 The project proponent shall respect human rights in accordance with the International Bill of Human Rights and universal instruments relating to human rights in project design and implementation.

3.19.13 The project proponent shall provide equal opportunities in the context of gender for employment and participation in consultation and project activities.

3.19.14 The proponent shall provide equal pay for equal work in project design and implementation.

3.19.15 The project proponent shall prohibit the use of forced labor, child labor, or victims of human trafficking in project design and implementation.

3.19.16 The project proponent shall respect human rights as set out in the International Labour Organization's Declaration on Fundamental Principals and Rights at Work as part of project design and implementation.

3.19.17 The project proponent shall identify IPs, LCs, and customary rights holders [including in areas outside the project area that are predicted to be impacted by the project] and recognize, respect, and promote the protection of the rights of said groups in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous People and ILO Convention 169 on Indigenous and Tribal Peoples, in project design and implementation.

3.19.18 The project proponent shall preserve and protect cultural heritage consistent with IPs', LCs' and customary rights holders' practices or UNESCO Cultural Heritage conventions in project design and implementation."

2) abides by the International Bill of Human Rights and universal instruments ratified by the host country.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.12 The project proponent shall respect human rights in accordance with the International Bill of Human Rights and universal instruments relating to human rights in project design and implementation.

3.19.16 The project proponent shall respect human rights as set out in the International Labour Organization's Declaration on Fundamental Principals and Rights at Work as part of project design and implementation.

3.19.17 The project proponent shall identify IPs, LCs, and customary rights holders [including in areas outside the project area that are predicted to be impacted by the project] and recognize, respect, and promote the protection of the rights of said groups in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous People and ILO Convention 169 on Indigenous and Tribal Peoples, in project design and implementation.

3.19.18 The project proponent shall preserve and protect cultural heritage consistent with IPs', LCs' and customary rights holders' practices or UNESCO Cultural Heritage conventions in project design and implementation."

3) takes into account and responds to local stakeholders' views.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

Sections 3.18.2-3.18.6 specify the required conduct of stakeholder engagement and consultation at the local level, including account to be taken of input received, possible updates to project design, grievance redress procedures, mechanisms for ongoing communication with stakeholders during project implementation, and information to be communicated prior to each validation/verification event.

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards, or that it has put in place the measures referred to in 7.1 b) 1) above.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted in our response to CCP criterion 7.1 b) 2), the VCS Standard v4.5 (see above URL) and the VCS Project Description Template (in particular section 2) require project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

7.8   Gender Equality

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1)   provides for equal opportunities in the context of gender

2)   protects against and appropriately responds to violence against women and girls

3)   provides equal pay for equal work

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.2-7.8, identify risks, and implement mitigation measures:

"3.19.8 The project proponent shall identify any risks related to the safety of women and girls in the local community due to project activities and shall design and implement mitigation measures that protect and appropriately respond to harm to women and girls in the local community.

3.19.13 The project proponent shall provide equal opportunities in the context of gender for employment and participation in consultation and project activities.

3.19.14 The proponent shall provide equal pay for equal work in project design and implementation."

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

As noted in our response to CCP criterion 7.1 b) 2), the VCS Standard v4.5 (see above URL) and the VCS Project Description Template (in particular section 2) require project proponents to provide extensive information to demonstrate that projects have appropriate safeguards in place and that requirements equivalent to CCP criteria 7.2-7.8 are met. This information includes the project proponent's conduct of stakeholder engagement and consultation, its identification of potential negative impacts, and it implementation of measures to mitigate such impacts.

The VCS Project Description Template v4.3 is available through the following link (under "Templates and Forms"): https://verra.org/programs/verified-carbon-standard/vcs-program-details/

7.9   Robust Benefit-Sharing

a) If your organisation requires arrangements for benefit-sharing with IPs & LCs, confirm that you require that mitigation activity proponents:

1) include in validated design documents information on how benefit-sharing arrangements that are appropriate to the context and consistent with applicable national rules and regulations will be designed and implemented through a benefit-sharing plan.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.9 on robust benefit sharing:

"3.19.22 Where the project activity impacts property rights, usage, or resources, the project shall include a benefit sharing agreement between affected stakeholder groups and the project proponent. Such an agreement shall be:

1) Appropriate to the local context.

2) Consistent with applicable national rules and regulations, and international human rights laws and standards.

3) Consistent with customary rights, to the maximum extent feasible

4) Agreed upon by IPs, LCs, and legitimate customary rights holders.

5) Shared in a culturally appropriate manner."

2) confirm in validated design documents that the draft and final benefit-sharing plan have been shared with the affected IPs & LCs in a form, manner, and language understandable to them.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

Where a benefit sharing agreement is needed, the VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.9 on robust benefit sharing:

Section 3.18.2 requires that discussion of benefit sharing must be included in the stakeholder consultation: "The project proponent shall conduct a stakeholder consultation before implementation of project activities. Such consultations shall be done in a manner that is inclusive, culturally appropriate, and respectful of local knowledge …".

"3.19.23 IPs, LCs, and customary rights holders shall have access to the benefit sharing agreement.

3.19.24 The project proponent shall provide, at minimum, evidence and/or a draft of the benefit sharing agreement to the validation/verification body at validation. The implemented benefit sharing agreement shall be provided to the validation/verification body at each verification.

Section 2.3.5 of the VCS Project Description Template v4.3, available (under "Templates and Forms") on https://verra.org/programs/verified-carbon-standard/vcs-program-details/, requires project participants to include information on: (a) the process used to design the benefit sharing plan, (b) a summary of the benefit sharing plan and (c) approval and dissemination of benefit sharing plan."

3) make benefit-sharing outcomes that result from the benefit-sharing plan publicly available, subject to applicable legal restrictions.

Yes

https://verra.org/wp-content/uploads/2023/10/AFOLU-Non-Permanence-Risk-Tool-v4.2-FINAL.pdf

Section 2.3.5 of the VCS Project Description Template v4.3, available (under "Templates and Forms") on https://verra.org/programs/verified-carbon-standard/vcs-program-details/, requires project participants to include information on: (a) the process used to design the benefit sharing plan, (b) a summary of the benefit sharing plan and (c) approval and dissemination of benefit sharing plan."

7.10   Cancun Safeguards

a) Confirm your organisation requires for all REDD+ mitigation activities that the mitigation activity is consistent with all relevant Cancun Safeguards as set out in paragraph 71 of decision 1/CP.16 of the United Nations Framework Convention on Climate Change.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

We consider the following Cancun Safeguards to be relevant to varying degrees for REDD projects and jurisdictional REDD programs and to be reflected in requirements elaborated in this application in response to the CCP criteria:

Safeguard (a) That actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements

Safeguard (b) Transparent and effective national forest governance structures, taking into account national legislation and sovereignty

Safeguard (c) Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that the

United Nations General Assembly has adopted the United Nations Declaration on the Rights of Indigenous Peoples

Safeguard (d) The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities [in REDD+ actions]

Safeguard (e) That actions are consistent with the conservation of natural forests and biological diversity, ensuring that the actions referred to in paragraph 70 of this decision are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits

Safeguard (f) Actions to address the risks of reversals

Safeguard (g) Actions to reduce displacement of emissions

7.11 Ensuring Positive SDG Impacts

a) Confirm your organisation requires that mitigation activity proponents, in validated design documents:

1) provide information on how the mitigation activity is consistent with the SDG objectives of the host country, where the SDG objectives are relevant, and such is feasible.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.11 on ensuring positive SDG impacts:

"3.17.1 The project proponent shall demonstrate how the project activities, or additional activities implemented by the project proponent, contribute to sustainable development, as defined by, and tracked against the SDGs. The project proponent shall demonstrate that a project contributes to at least three SDGs by the end of the first monitoring period, and in each subsequent monitoring period. Where possible, project proponents should demonstrate how the project activity(s) is consistent with the SDG objectives of the host country."

2) demonstrate, if applicable, through qualitative assessment how the mitigation activity delivers positive SDG impacts for certain SDGs (excluding SDG 13), if any.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The VCS Standard v4.5 (see above URL) requires project participants to meet requirements equivalent to CCP criteria 7.11 on ensuring positive SDG impacts:

"3.17.1 The project proponent shall demonstrate how the project activities, or additional activities implemented by the project proponent, contribute to sustainable development, as defined by, and tracked against the SDGs. The project proponent shall demonstrate that a project contributes to at least three SDGs by the end of the first monitoring period, and in each subsequent monitoring period. Where possible, project proponents should demonstrate how the project activity(s) is consistent with the SDG objectives of the host country."

Section 1.8 of the VCS Project Description Template v4.3, available (under "Templates and Forms") on https://verra.org/programs/verified-carbon-standard/vcs-program-details/, requires project participants to provide a description of (a) a summary description of project activities that result in sustainable development contributions, (b) an explanation of how project activities will result in expected SD contributions, and (c) how the project contributes to achieving any nationally stated sustainable development priorities, including any provisions for monitoring and reporting these.

3) provide information on any standardised tools and methods that were used to assess the SDG impacts.

Yes

https://verra.org/wp-content/uploads/2023/08/VCS-Standard-v4.5-updated-4-Oct-2023.pdf

The response above to CCP criterion 7.11 a) 2) is not limited to qualitative assessments. If project proponents have used standardised tools and methods for such assessment, the information required under section 3.17.1 of the Standard v4.5 (see above URL) and Section 1.8 of the VCS Project Description Template v4.3, available (under "Templates and Forms") on https://verra.org/programs/verified-carbon-standard/vcs-program-details/ would also include any use of standardised tools and methods to assess SDG impacts.

End of Application