

**Consultation Draft
CCP rule architecture:
a system for Interpretations,
Technical Notices, and
Clarifications for the
Core Carbon Principles -
Assessment Framework**

Consultation period: 5 May – 7 June 2026

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1. Introduction

The Integrity Council for the Voluntary Carbon Market (ICVCM) is an independent, non-profit governance body that aims to ensure the voluntary carbon market effectively contributes to global greenhouse gas emissions mitigation action and climate finance delivery at scale. The Integrity Council sets and maintain the independent global threshold standard for quality for carbon credits. The threshold is based on the ICVCM’s Core Carbon Principles (CCPs) and is implemented through the Assessment Framework which sets out what high integrity means by reference to those principles.

Since publishing the Core Carbon Principles and Assessment Framework in July 2023, the Integrity Council has driven a step-change in global carbon market standards. Nine major carbon-crediting programs and 38 methodologies have been approved, following rigorous assessment against the Core Carbon Principles.

Under the Integrity Council’s “two-tick” assessment process, first, a carbon-crediting program’s governance and systems are assessed, followed by an evaluation of its methodologies for designing and implementing carbon projects. Programs are reviewed for the quality of their governance, as well as their processes for ensuring strong social and environmental safeguards and delivering positive sustainable development outcomes. Methodologies are assessed based on their capacity to deliver lasting and robustly measured greenhouse gas emission reductions that would not have otherwise occurred.

These assessments are informed by the Integrity Council’s Expert Panel which provides independent technical guidance to ensure that evaluations are robust and aligned with best practice. Carbon credits can only be tagged with the CCP label if both the issuing program and the methodology used are CCP-Approved by the Integrity Council’s independent Governing Board.



In 2026, to support interconnectivity across all carbon markets, the Integrity Council is starting work to enable carbon-crediting programs operated by government entities or agencies to apply for Integrity Council assessment against its high-integrity threshold. Under the CCPs, both government-administered and independent carbon-crediting programs must operate with a consistent level of high integrity.

Approvals of programs and their methodologies mark the beginning of the Integrity Council’s assurance and oversight process which includes annual reporting by CCP-Eligible Programs and ongoing performance-monitoring activities.



The Integrity Council’s continuous improvement work programs have

engaged over
200
stakeholders



from more than
140
organisations



through over
70
meetings



and
200
hours of
discussion,



resulting in five
reports containing
more than
100
recommendations.

This work is supported by the
Science and Research Network,
which is currently tracking

43

priority topics.

The self-led Indigenous Peoples and Local Communities Engagement
Forum has also developed its strategy through consultation with
rights-holders and non-governmental organizations, reaching around

300

participants through virtual and in-person engagement.

2. Background to this consultation

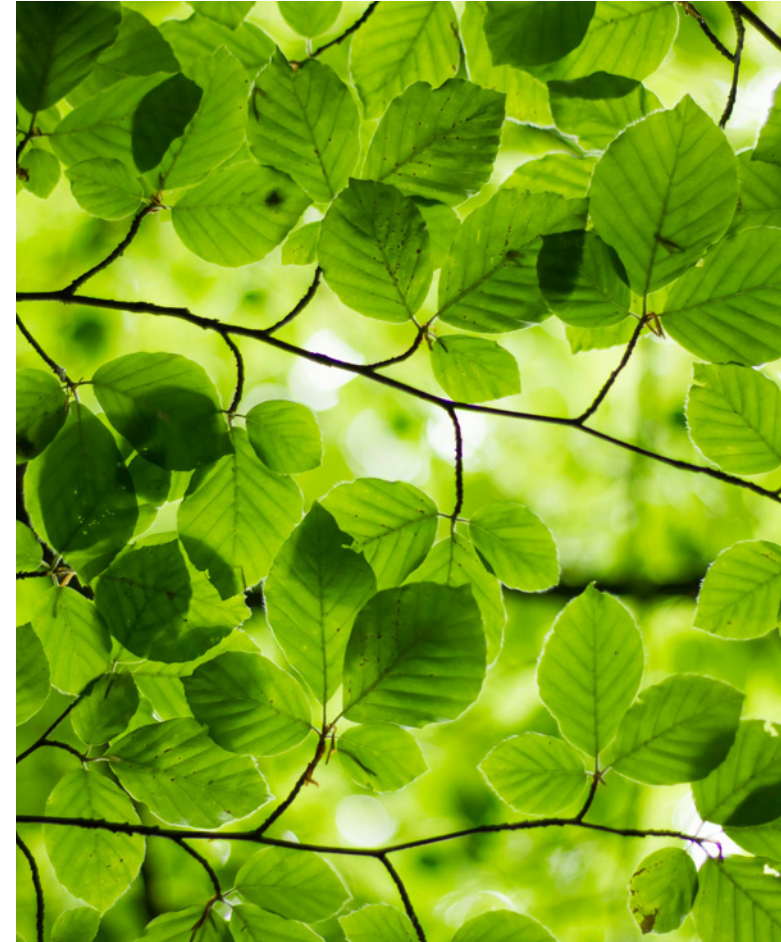
The Integrity Council is launching this public consultation on the CCP rule architecture – a system for Interpretations, Technical Notices, and Clarifications. This system describes how existing ICVCM Assessment Framework criteria and requirements will be interpreted, applied, assessed, and updated over time, and how instruments and companion documents will support and complement the existing Core Carbon Principles, Assessment Framework, and the current version of the Assessment Procedure.¹ This document sets out the context, rationale and key elements of the system and the questions on which the Integrity Council is seeking responses through this consultation.

The Integrity Council has already established the [Core Carbon Principles \(CCPs\)](#) and the [Assessment Framework](#), which together define the independent global integrity threshold for carbon credits. This consultation is seeking public input on how the Integrity Council will organise and govern ongoing interpretative, technical, and operational decisions that arise as the market evolves. The system will ensure

that such decisions are made in a structured, transparent, and predictable manner, while enabling the strengthening of the criteria and requirements over time.

Future formal amendments, revisions, or additions to the Core Carbon Principles or the Assessment Framework criteria and requirements, as adopted, will be considered at a future time and are outside the scope of this public consultation.

Key terms used in this document are listed in the Glossary (section 10). Readers may find it helpful to review them before proceeding.



¹ The Assessment Procedure will be updated in due course to reflect the final version of the system adopted following this public consultation.

3. Continual improvement of the Assessment Framework

The Integrity Council now has more than three years of experience from carbon-crediting program and methodology assessments, recommendations from its Continuous Improvement Work Programs (CIWPs), the strategic work of the Indigenous Peoples and Local Communities Engagement Forum, developments in carbon market science, and feedback from market participants using and following the Assessment Framework.

To reflect that expanding body of experience and advances in understanding, the Integrity Council will use the system to interpret, clarify and update existing provisions in the Assessment Framework.

This consultation seeks input on the system the Integrity Council will use to develop and publish the instruments for that purpose. This system will increase clarity where needed, strengthen specific provisions in the Assessment Framework over time, and balance that incremental evolution with the need for predictability and market resilience.

This is a public consultation on the process the Integrity Council will use.

It is not a consultation on new criteria or requirements for carbon-crediting programmes, methodologies, or projects.

Starting from late 2026, further public consultations on targeted technical issues in the criteria and requirements of the Assessment Framework will follow.



4. Overview of the system

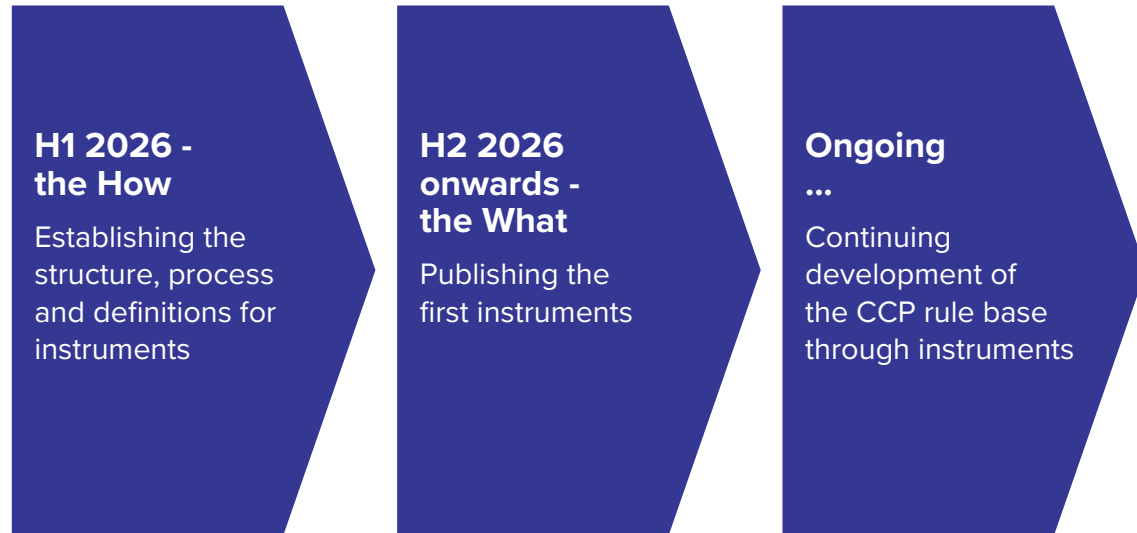
The system is based on a set of proposed instruments – Interpretations, Technical Notices, and Clarifications.

These instruments will sit within a clear rule architecture that explains how they are developed, approved, and applied, and how they relate to the Core Carbon Principles (CCPs) and the Assessment Framework.

The system will be introduced in stages. The first stage will focus on putting in place the structure, process, and definitions needed to support the use of Interpretations, Technical Notices, and Clarifications. Over time, the system will support the continued development of the CCP rule base through the use of those instruments.

See diagram 1 for a simplified view of this staged approach.

Diagram 1: A staged approach



5. How the CCP rule architecture works

The CCP rule architecture will use a simple three-tier structure so that each issue is addressed through the appropriate instrument, and at the appropriate level of decision-making within the Integrity Council.

Box 1 summarizes the main features of the CCP rule architecture, including its structure, function, scope, and inputs.

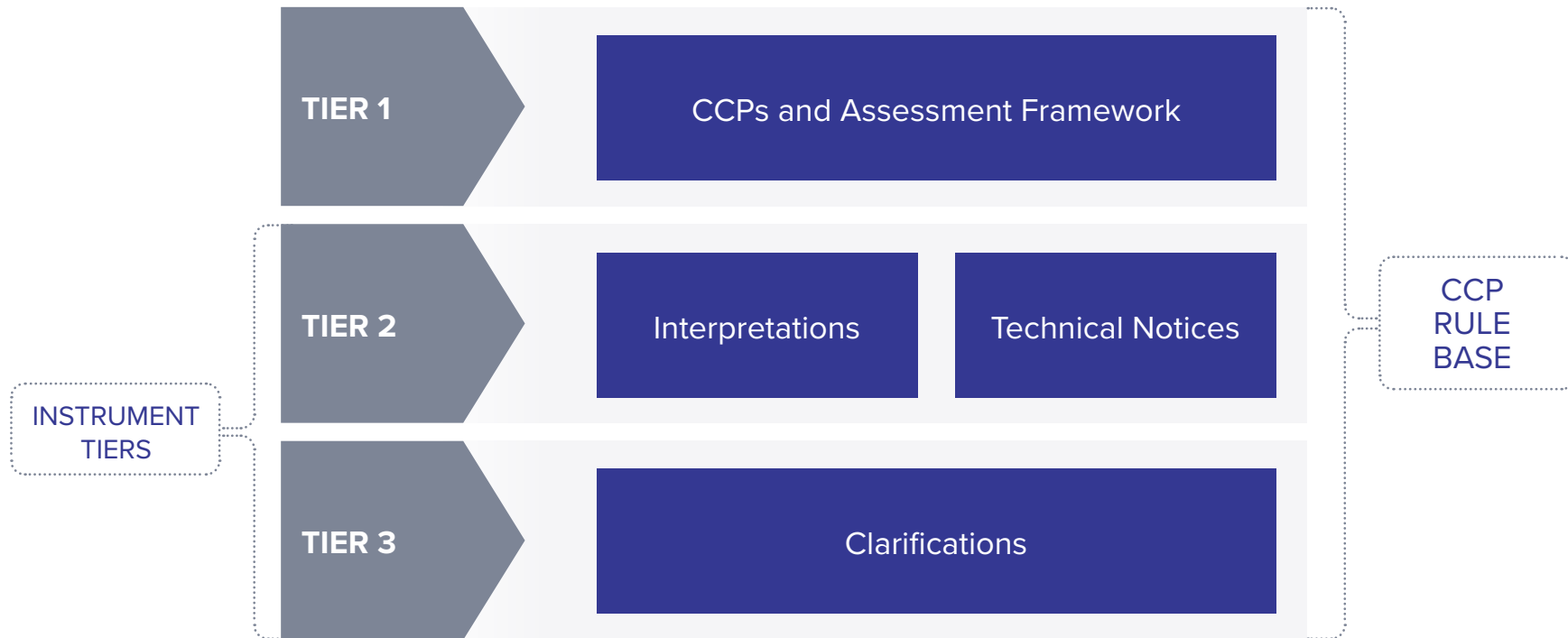
BOX 1 - Key features of the CCP rule architecture

<p>Structure</p> <ul style="list-style-type: none"> ■ One rule architecture with a simple three-tier hierarchy of instruments. ■ Each tier has a clear purpose and place in the Integrity Council’s decision-making structure. 	<p>Function</p> <ul style="list-style-type: none"> ■ Enables timely development of the CCP rule base. ■ Sets out the process for developing, reviewing, approving, and adopting instruments. ■ Distinguishes between interpretive decisions, technically-focused notices, and operational clarifications. 	<p>Scope</p> <ul style="list-style-type: none"> ■ Instruments will interpret, clarify, or support the application of existing criteria and requirements, helping strengthen the CCP rule base over time. ■ The Core Carbon Principles and the Assessment Framework (v1.1) will remain in force and will not be amended by instruments published under this system. ■ At a later stage, adopted instruments and other relevant inputs may be consolidated into amendments or revisions of the Assessment Framework through a separate process initiated by the Governing Board. 	<p>Inputs</p> <ul style="list-style-type: none"> ■ Lessons from assessment and assurance. ■ Recommendations from Continuous Improvement Work Programs. ■ ICVCM stakeholder input, including from the Expert Panel. ■ Developments in regulation. ■ External stakeholder input, including from the IPLC Engagement Forum. ■ Science and research developments, including from the Science and Research Network.
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Diagram 2 shows how the CCP rule base is structured, including the relationship between the instrument tiers that support the use of the Core Carbon Principles and the Assessment Framework in practice.

Diagram 2: Structure of the CCP rule base



6. Instruments

The CCP rule architecture brings together the CCPs, the Assessment Framework, three main instrument types and is supported by a suite of companion documents (see diagram 2, page 9).

Interpretations

Interpretations explain the meaning, scope, or intent of existing provisions in the CCPs or the Assessment Framework or strengthen the way it is implemented. They may affect how criteria and requirements are assessed and may affect the threshold for CCP-Approval or CCP-Eligibility after the effective date. Given their potential impact, Interpretations will normally be subject to public consultation and appropriate transition measures.

Technical Notices

Technical Notices address the technical application of existing requirements, such as methods, parameters, data sources, or technical approaches. Given their potential impact, Technical notices will normally be subject to public consultation and appropriate transition measures.

Clarifications

Clarifications address operational and implementation matters, including procedural, administrative, or documentation questions. They are not intended to change how criteria requirements are assessed or to affect eligibility or assessment. Clarifications will be published by the Integrity Council's Executive Secretariat, under oversight of the ICVCM governance system.

Table 1 summarises the main elements of the CCP rule architecture, including the Core Carbon Principles and Assessment Framework, the three instrument types, the ICVCM governance level responsible for each, and their likely effect on how criteria and requirements are applied and assessed.

Table 1: Tiers and instruments of the CCP rule architecture

Tier	Type	Description	ICVCM governance level	Implementation
1	CCPs and Assessment Framework	Set the principles, requirements, and criteria for CCP-Approval and CCP-Eligibility. Adopted by the Governing Board.	Governing Board, with support from the Expert Panel	Define the integrity threshold and the basis for assessments. They are the authoritative reference point for assessments. Any process to amend them is outside this system.
Instruments				
2	Interpretation	Instrument that explain the meaning, scope, or intent of an existing provision in the CCPs or the Assessment Framework or strengthens the way it is implemented.	Governing Board, with support from the Expert Panel	May affect how criteria and requirements are assessed and may affect the threshold for CCP-Approval or CCP-Eligibility after the effective date. Normally subject to public consultation and transition measures, including appropriate grace periods.
2	Technical Notice	Instrument addressing the technical application of existing requirements, such as methods, parameters, data sources, or technical approaches.	Standards Oversight Committee, under delegated authority from the Governing Board, with support from the Expert Panel	May affect how criteria and requirements are assessed and may affect the threshold for CCP-Approval or CCP-Eligibility after the effective date. Normally subject to public consultation and transition measures, including appropriate grace periods.
3	Clarification	Instrument addressing operational and implementation matters, including procedural, administrative, or documentation questions.	Executive Secretariat, under oversight of the ICVCM governance system, with support from the Expert Panel	Not intended to change how criteria requirements are assessed or to affect eligibility or assessment. Public consultation and grace periods are normally not needed.

The key distinction between instruments is that some impact how criteria and requirements will be assessed from the effective date following any relevant grace period, and others do not:

- **Interpretations and Technical Notices (Tier 2)**, may, from the effective date following any relevant grace period, affect how criteria and requirements are assessed. This means public consultations and transition measures will normally be needed to understand potential market impacts and manage them appropriately.
- **Clarifications (Tier 3)** are intended to be limited to operational matters. They help answer implementation questions without changing how Assessment Framework criteria and requirements are assessed. These are not expected to need grace periods or transition measures due to the absence of expected material impacts on assessment outcomes.

The governance system within the ICVCM (the Governing Board, advised by the independent Expert Panel) helps to ensure that Clarifications remain within their intended scope and are not used for issues that should instead be addressed through Interpretations or Technical Notices.

Table 2 presents illustrative examples of instruments. **These examples are included solely to illustrate format and function, not to signal the Integrity Council’s positions or any upcoming decisions.**

Table 2: Examples of instruments (for illustration only)

Instrument	Example only - not indicative of future intentions or changes
Interpretation	<p>CCP Assessment Framework Requirement 3.1 a) 1). In addition to CORSIA requirements, the carbon-crediting program shall ensure 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). (see p. 56 of the Assessment Framework).</p> <p>Interpretation: The requirement shall be understood, starting from [effective date], as requiring the following elements to be made public: [list of elements, including any additions].</p>
Technical Notice	<p>CCP Assessment Framework Criterion 10.4 Quantification of emissions or removals from the mitigation activity (see p. 89 of the Assessment Framework)</p> <p>Technical Notice: Methodologies for activities in the landfill gas capture and utilization category shall, starting from [effective date], apply an oxidation factor of [XX].</p>
Clarification	<p>CCP Assessment Framework Criterion 9.3 a) 5). The carbon-crediting program shall [...] treat cessation of monitoring and verification as an avoidable reversal. (see p. 83 of the Assessment Framework)</p> <p>Clarification: Cessation of monitoring and verification shall result in a compensation liability equivalent to the amount of credits that a project previously contributed to a pooled buffer reserve. (based on recommendation from the Continuous Improvement Work Program on Permanence)</p>



Companion documents

To support the implementation of the CCPs and the Assessment Framework, the Integrity Council uses a set of documents that, under the CCP rule architecture, will be categorized as companion documents. These include the Assessment Procedure, confidential Terms and Conditions, Hearings Procedure, governance documents, FAQs and others. An informational table listing key companion documents is presented in the Annex.

Companion documents sit alongside the instrument tiers within the CCP rule architecture and support the implementation and use of the CCP rule base. They do not all have the same status.

The CCPs, the Assessment Framework, and the instruments remain the authoritative sources for the substance of criteria and requirements, interpretation, and technical updates, while companion documents support their implementation, explanation, and day-to-day use by stakeholders.

Instrument development process

Diagram 3 (page 14) shows a simplified explanation of the internal ICVCM process for instrument development.

As the first step, after identifying the topic, is the ICVCM Executive Secretariat, with support from the Expert Panel, identifies the most appropriate instrument. The draft instrument is developed and refined, and then if an Interpretation or Technical Notice is proposed, approved to go to public consultation by the Standards Oversight Committee. After the public consultation, the draft instrument may be refined in light of public consultation responses and then finalized for adoption. It becomes effective after expiry of the specified grace period, if applicable. Once effective, it forms part of the rules used by the ICVCM to conduct assessment and assurance under the Assessment Framework criteria and requirements.

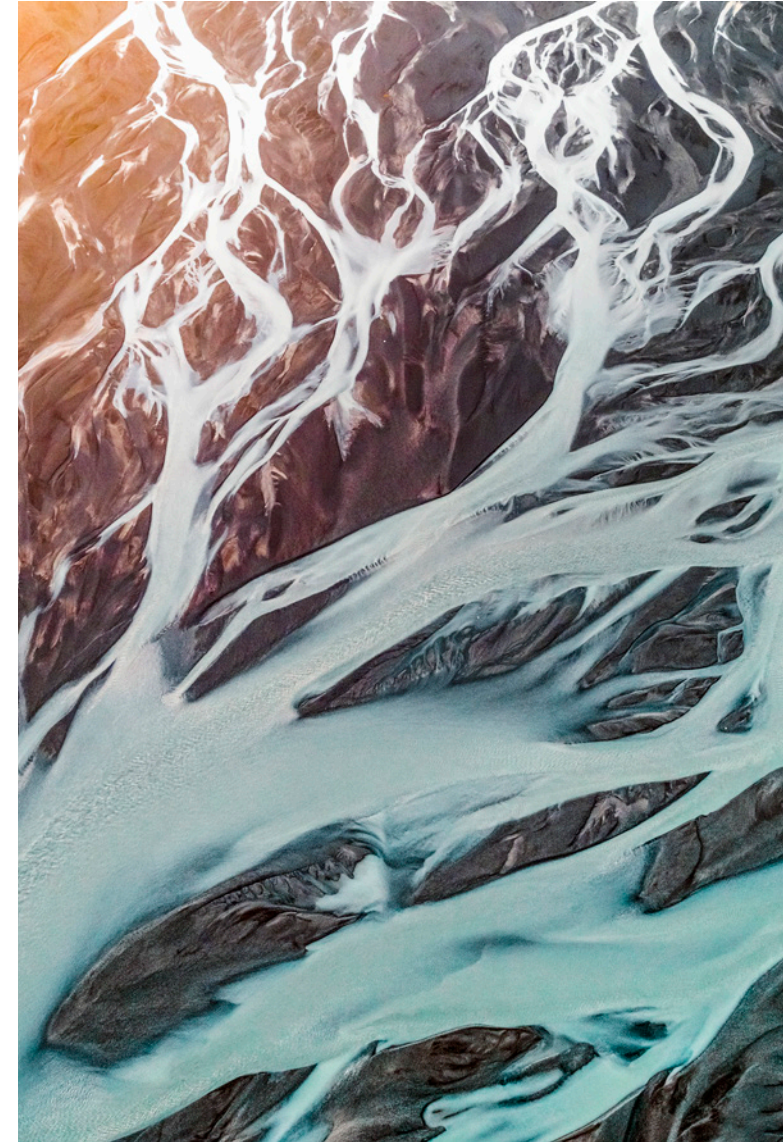


Diagram 3: Instrument development and adoption process



7. Transition measures

Where an instrument is expected to materially affect how Assessment Framework criteria and requirements are assessed, the Integrity Council will consider grace periods before the instrument becomes effective, and other transition measures to support market adjustment and avoid unnecessary disruption, such as exemptions, phased implementation and others.

Public consultation responses are expected to help inform such measures. The ICVCM recognizes the importance of predictable and stable rules and the importance of allowing time to adapt to evolution of the Assessment Framework.

BOX 2 - How instruments become part of assessment and assurance under the Assessment Framework

- Instruments will **apply prospectively** (forward-looking) from their adoption or effective date, to future assessments and assurance processes.
- Instruments **do not apply retroactively or to ongoing assessment or assurance** (programs, methodologies), unless this is expressly stated, separately justified, and subject to appropriate governance and safeguards.
- Transition measures, including **grace periods will be specified** where an instrument (Interpretation or Technical Notice) is expected to materially affect how Assessment Framework criteria and requirements are assessed after the effective date of the instrument. The **duration of a grace period will be determined case by case**, and may be part of the public consultation related to the instrument.
- From the effective date, assessments and assurance shall use the Assessment Framework criteria and requirements plus the provisions in the instrument. Any provisions set out in such instruments will be made clearly visible with the relevant criteria and requirements of the Assessment Framework on the ICVCM website.
- **CCP- Eligible Programs and CCP-Approved methodologies (version specific) maintain their status.** Assurance ensures adherence to the instrument provisions after the effective date.



8. Consultation questions

Responses from stakeholders are invited on the questions below through a dedicated webform.

Respondents will also be asked to submit general information about their organisational affiliation.

For any enquiries, please email: consultations@icvcm.org. Please do not use this email to submit responses to the consultation questions.

The Integrity Council will review and consider all public consultation responses received, publish the responses with a high-level summary (see publicity notice below), and determine whether and how the system should be refined before it is considered through the Integrity Council’s governance process.

Consultation questions

- 1** How clear do you find the distinctions between the different instrument types: Interpretations, Technical Notices, and Clarifications? What, if anything, would benefit from further explanation?
- 2** What factors should influence ICVCM’s choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?
- 3** For what types of technical updates do you think this system will work well, and where might it be less suitable?
- 4** What factors should guide whether a grace period is needed before entry into force on the effective date and how long such a grace period should be?
- 5** The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?
- 6** In terms of your ability to keep up to date with ICVCM’s work as it develops and publishes these instruments, would your organisation find it easier to keep up to date if the changes were:
 - Published on a rolling basis, as and when each is ready.
 - Published at predictable frequencies, in batches (e.g., twice per year).
 - A mix of the above, depending on the urgency.
 - It is not important to my organisation.
- 7** Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification? If yes, what factors should ICVCM take into account in deciding whether to do so?
- 8** Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification? If so, which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?
- 9** Are there any specific CCP criteria or requirements for which Interpretations, Technical Notices or Clarifications might not work well, due to the nature of the existing rule? Please see the full set of requirements of the Assessment Framework [here](#).

9. How to respond

Please submit responses through the [online consultation form](#).
 The consultation will be open until June 7th, 2026, 11.59 pm BST.



Publicity notice

The Integrity Council for the Voluntary Carbon Market (ICVCM) is committed to transparency and openness in its public consultations. As part of this commitment, ICVCM will publish consultation responses in full by default. Publishing full responses supports openness, accountability, and confidence in ICVCM's decision making processes.

Responses will normally be visibly attributed to the submitting individual or organisation. For that reason, respondents are asked not to include confidential, sensitive, or personal information in their submissions unless strictly necessary. Requests for anonymisation will be considered on a case by case basis against the exceptions criteria set out below. If the request cannot be granted, the respondents will be offered the opportunity to resubmit a response within the consultation window.

Exceptions

In limited circumstances, ICVCM may anonymise, redact, or withhold parts of a response before publication, upon a respondent's request via consultations@icvcm.org. This may apply where a response includes:

- Personal data or other information requiring protection under applicable data protection laws;
- Confidential or commercially sensitive information, including proprietary or confidential material provided with reasonable justification;
- Safeguarding, security, or safety related concerns;
- Exceptional legal or regulatory risk, where publication could reasonably prejudice legal or regulatory processes.

Responses that are clearly outside the scope of the consultation, or that do not constitute a genuine consultation submission (for example, spam or irrelevant material), contain defamatory, abusive, or inflammatory content, or unsubstantiated allegations will not be taken into consideration and will not be published.

By submitting a response, respondents acknowledge and agree to the [consultation's data protection](#) and the above publication terms.

Languages

The language of this consultation is English. To facilitate an inclusive approach to stakeholder engagement, this document is available in unofficial translations in French, Spanish and Portuguese. The ICVCM will endeavour to take into consideration responses made in these languages. ICVCM cannot guarantee that responses made in any other languages will be processed accurately.

10. Glossary

Below is an informal glossary of terms used for the purpose of this consultation. The definitions may not be fully consistent with the Definitions section of the CCP Assessment Framework and are subject to change following this consultation.

Term	Definition
CCP rule architecture	The structure, processes, governance arrangements, and pathways for using developing and adoption of Interpretations, Technical Notices, and Clarifications to support the evolution of the CCP rule base over time.
CCP rule base	The body of rules, instruments, and supporting documents used to apply the Core Carbon Principles and the Assessment Framework in practice. It includes the CCPs, the Assessment Framework, regulatory instruments, and relevant companion documents.
Clarification	An operational instrument that explains how criteria and requirements are implemented in assessment and assurance. Clarifications may focus on procedural, administrative, or documentation matters. They are not intended to affect how criteria and requirements are assessed.
Companion document	A document that supports the implementation, use, or understanding of the CCPs, the Assessment Framework, and related regulatory instruments and how the ICVCM operates the assessment and assurance functions. Companion documents may be operational, reference, explanatory, or informational. They do not all have the same status, and not all are binding.
Effective date	The date from which an adopted and published instrument takes effect following any applicable grace period or other transition measures.
Evolution	The gradual development of the CCP rule base over time through the use of regulatory instruments and supporting documents. In this system, evolution refers to structured strengthening, clarification, and application of existing criteria and requirements, rather than textual amendment or revision of the CCPs or the Assessment Framework provisions themselves.



Term	Definition
Grace period	A transition measure, where there is a defined period of time between the adoption of an instrument and the date on which it begins to apply (effective date). Grace periods may be used where needed to support orderly implementation and market predictability.
Instrument	A formal document type used within the CCP rule architecture to interpret, apply, or clarify existing requirements. Instruments sit below the CCPs and the Assessment Framework in hierarchy terms and include Interpretations, Technical Notices, and Clarifications.
Interpretation	An instrument adopted by the Governing Board that explains the meaning, scope, or intent of an existing provision in the CCPs or the Assessment Framework or strengthens the way it is implemented. Interpretations may affect how criteria and requirements are assessed.
Material impact	Occurs where a change resulting from an Instrument affects how criteria and requirements are assessed after the Effective Date. Instruments with material impact will often require public consultation and transition measures, such as grace periods.
Non-material impact	Occurs where a change resulting from an Instrument does not affect how criteria and requirements are assessed. Instruments with non-material impact are not expected to affect eligibility or labelling. Instruments with non-material impact are usually operational or administrative in nature, and so transition measures are not usually required.
Prospective application	The principle that instruments, following adoption and publication only apply to future assessments and assurance processes and decisions, rather than retroactively, unless expressly stated and separately justified.
Technical Notice	An instrument that addresses the technical application of the CCPs or the Assessment Framework criteria and requirements. Technical Notices may deal with methods, parameters, data sources, or technical approaches, and may affect how criteria and requirements are assessed.
Transition measure	A measure that helps manage the move from an existing approach to a new one. Transition measures may include grace periods, staged implementation, exemptions, or other arrangements that enable CCP-Eligible Programs to manage the material impact.



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Annex



Companion documents

The table below lists key companion documents that support the CCP rule architecture.

Document type	Function
Assessment Procedure	Explains how Programs and methodologies are assessed for CCP-Eligibility and CCP-Approval.
Terms and Conditions	Sets out the rights and obligations between Programs that are applying to the ICVCM, becoming, CCP-Eligible and being subject to ICVCM assurance and oversight, and the ICVCM.
Definitions	Provides definitions of key terms used across the CCPs, the Assessment Framework, the Assessment Procedure, and related documents.
Hearings Procedure	Sets out the procedure for managing a Hearings process as provided for by the Assessment Procedure
Guidance	Provides additional explanation of ICVCM expectations and examples of good practice for Programs and market participants.
FAQs	Provides answers to common implementation questions.
Governance documents	Documents that guide the Integrity Council’s work, including Modalities and Procedures, Terms of Reference for committees and bodies, the Code of Conduct and key policies. A full list can be found on the website .



The Integrity Council for the Voluntary Carbon Market (ICVCM) is an independent, non-profit governance body for the voluntary carbon market, which aims to ensure the voluntary carbon market accelerates a just transition to 1.5°C. The ICVCM aims to set and maintain a voluntary global threshold standard for quality in the voluntary carbon market. The threshold standard is based on the ICVCM's Core Carbon Principles (CCPs) and is implemented through an Assessment Framework that sets out what high quality means by reference to those principles.



www.icvcm.org



info@icvcm.org



www.linkedin.com/company/icvcm/