CCP Rule Architecture Public Consultation, May-June 2026

Response Synthesis Note

1. Background to the consultation

The Integrity Council for the Voluntary Carbon Market (ICVCM) launched a public consultation in June 2026 on the proposed Rule Architecture for the Core Carbon Principles (CCP). The consultation sought stakeholder feedback on the introduction of a three-tier framework of instruments (Interpretations, Technical Notices, and Clarifications) to support the ongoing implementation and evolution of the CCP Assessment Framework (AF).

The proposed Rule Architecture is intended to provide a structured, transparent, and predictable approach to addressing emerging issues, clarifying requirements, and incorporating technical developments, without reopening or amending the CCPs or the Assessment Framework itself.

The consultation invited views on key design elements, including the distinctions between instruments, criteria for their use, governance processes, grace periods and transition arrangements, safeguards against retroactivity, and stakeholder participation.

The objective of the consultation was to ensure that the Rule Architecture supports both environmental integrity and market confidence, while enabling the CCP framework to remain responsive to evolving science, policy, and market practice.

2. Responses received, respondent profile, and processing approach

2.1. Responses received and data cleaning

A total of 34 submissions were received through the public consultation process, including both online form submissions and manual submissions. Following data cleaning, 2 duplicate submissions were removed, resulting in 32 relevant responses included in the analysis.

2.2. Composition of respondents

Of the 32 relevant submissions, approximately 70% were submitted on behalf of organisations. Respondents represented a broad cross-section of the voluntary carbon market, with **over a half being programs, project developers or buyers**. Respondents were geographically diverse, with representation across all major regions. North America (7) and Europe (7) accounted for the largest share.

Respondents were **generally well-informed** and actively engaged in carbon markets: the majority of respondents indicated they use the CCP Assessment Framework regularly as part of their work. Others engage periodically to check specific rules or understand ICVCM's overall approach.

Submissions were typically grounded in direct experience with carbon crediting programs and methodologies, project development and implementation, and policy, research, or advisory roles in carbon markets. None of the respondents requested anonymity or redaction of any information. A full list of respondents is provided in Annex 1.

Category	Breakdown
Respondent type	• 23 organisations • 9 individuals
Organisation types represented	• Carbon-crediting programs (8); • Project developers (7); • Buyers/intermediaries (2); • Consultancy (1); • Academic/research (1); • Environmental/social NGOs (1); • Other organisations (3)
Geographic distribution (organizations only)	• North America (7); • Europe (7); • Africa (3); • South Asia (2); • Latin America/Caribbean (2); • East Asia (1); • Asia-Pacific (1)
Level of engagement with CCP AF	• Regular users – as part of usual work (17); • Occasional – specific rules (5); • Occasional – general understanding (7)

2.3. Processing and analysis approach

Responses were reviewed using a structured and iterative approach to ensure consistency, analytical rigour, and comprehensive coverage of both individual submissions and cross-cutting themes. Each response was assigned to two reviewers, enabling independent assessment and triangulation of findings. Reviewers applied a common set of analytical criteria to support both respondent-level ("horizontal") summaries and thematic ("vertical") synthesis across consultation questions.

The analysis combined manual expert review with AI-assisted summarisation. Manual review allowed for detailed interpretation of submissions and identification of nuanced or context-specific insights, while AI tools were used to support the aggregation of responses and generation of high-level thematic summaries.

In parallel, responses were screened to identify and remove duplicate submissions, and to review any personal or identifying information for appropriate handling. All retained responses were then consolidated into a structured dataset, enabling consistent comparison across questions and analytical dimensions.

3. Key themes

Overall, consultation respondents were broadly supportive of the proposed Rule Architecture and its objective of improving clarity, consistency, and the ongoing evolution of the CCP framework. Responses were generally constructive and reflected a high degree of engagement with the proposal.

Stakeholders consistently emphasised that the effectiveness of the framework will depend on clear boundaries, robust governance, and implementation. Respondents focused on the following key themes:

- Clear distinctions between the different instruments of the CCP Rule Architecture and their relationship to the CCP Assessment Framework.
- Definitions, thresholds, consultation mechanisms, and supporting tools to ensure predictability, transparency and consistency of application.
- Proportionality, minimizing uncertainty and maintaining market confidence and avoiding fragmentation in the application of CCP requirements.
- Prospective application of instruments and clear transition measures, including defined grace periods as critical mechanisms to enable implementation while preserving certainty, investor confidence, and operational continuity.
- Structured and predictable approach to implementation, notification and publication.
- Stakeholder participation in the operation of the Rule Architecture, including in the development of instruments.

Full responses to the consultation are contained in Annex 2.

Annex 1: List of respondents

A. Submissions on behalf of organisations

The following organisations submitted responses to the consultation:

1. Africa Carbon Market Inc
2. BioCarbon Cert
3. Climate Action Reserve
4. Climate and Energy Policy Initiative
5. DigiGreen Impact
6. Environmental Resources Trust (ERT), on behalf of ACR and ART
7. Gold Standard
8. IETA
9. Isometric
10. JGC Holdings
11. The Nature Conservancy
12. PramaanOne
13. Puro.earth
14. Rainbow
15. Tokyo Gas Co., Ltd
16. TrackGains Sustainable Solutions LTDA
17. Tradewater
18. Transparency International
19. TÜV SÜD
20. Value Network Ventures Advisory Services Pvt. Ltd.
21. Verra
22. Weyerhaeuser
23. Wildlife Works PBC

B. Submissions from individuals

The following individuals submitted responses in a personal capacity:

1. Nate Van Beilen - Carbon markets policy and strategy expert; ICVCM Expert Panel member
2. Ruth Perez - independent respondent
3. Joseph Gituma - Community-based environmental restoration and carbon projects practitioner
4. Kyann Hadife - Carbon market integrity specialist focused on carbon removal and MRV frameworks
5. Zerihun Arerso - Independent respondent
6. Nick Marriott - Independent respondent
7. Haithan Askar - Independent respondent, expert involved in ISO standards development.

8. Lucinda Diop - Carbon market consultant specialising in registries, Article 6 implementation and technical documentation
9. Max DuBuisson - Nature-based solutions and carbon market integrity expert (MRV / protocols)

Note on duplicates

Two duplicate submissions were identified and excluded during data cleaning. The lists above reflect unique respondents only included in the analysis.

Annex 2: Full responses to the consultation

Name	Mr. David Armstrong
Are you responding as...	On behalf of an organisation
Organisation	Isometric
My organisation is...	A carbon-crediting program
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?	The distinction between Interpretations, Technical Notices and Clarifications is clear in intent and seems sensible, but the boundary depends heavily on the proposed concept of "material impact". It would be helpful to have that more tightly defined. The current glossary defines material impact as a change "that affects how criteria and requirements are assessed after the Effective Date", but it's unclear where exactly the line is between something affecting how requirements are assessed vs not. Given the potentially significant impact of Interpretations and Technical Notices on Programs, it may be helpful to provide a list of the types of clarifications that would fall into this category, with anything outside that list requiring public consultation, grace periods, etc.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	Isometric considers that the primary factor should be the magnitude and nature of the impact on programs, methodologies, and projects. Specifically, ICVCM should treat an instrument as a Tier 2 Interpretation or Technical Notice (and therefore subject it to public consultation and a grace period) wherever there is a reasonable likelihood that it will: (a) affect the eligibility or approval status of a methodology or program; (b) change the volume of credits a project would issue under an existing methodology; (c) impose new operational, monitoring, or documentation obligations on programs or project developers; or (d) reflect a substantive change in interpretation, even where no parameter is altered. Where any of these conditions could apply, the default should be an Interpretation or Technical Notice, with Clarifications reserved strictly for genuinely procedural or administrative matters such as document templates, formatting, or submission portals. The classification decision should sit with the Standards Oversight Committee rather than the Executive Secretariat alone, to avoid governance gaps.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The system should work well for: clarifications of operational and procedural matters and targeted interpretation of ambiguous phrasing in the Assessment Framework. If there are issues that come up during assessments and where it is clear that there is confusion, either among Programs or ICVCM's reviewers, those would be good candidates for these types of updates. We would encourage ICVCM to avoid using these processes to make substantive updates that could affect multiple categories, or to impose specific scientific interpretations on Programs – in our view, those more impactful changes should be included in future Assessment Framework updates or handled as part of Category assessments.

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?	A grace period should be the default for any Tier 2 instrument (Interpretation or Technical Notice), with the burden falling on ICVCM to justify the absence of a grace period rather than its presence. The minimum grace period should be 12 months, with longer periods (18–24 months) for instruments that require programs to update protocols, methodologies, or operational infrastructure. Factors that should drive duration include: the extent to which programs must rewrite protocols or amend approved methodologies; the lead time required for project developers to adapt; whether VVBs need to update their audit procedures; whether new monitoring infrastructure is required; the typical cadence of program protocol release cycles (Isometric, for example, operates on a six-month release cycle); and the volume of ongoing assessments in flight that would be disrupted. We would also encourage ICVCM to formally consult CCP-Eligible Programs privately on draft instruments before launching public consultation, so that programs have advance notice and can flag implementation challenges before the instrument is finalised.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Isometric strongly supports the prospective-only principle articulated in Section 7, and views it as essential for market predictability and the continued value of existing CCP-Approvals and credit vintages. To safeguard this principle in practice, ICVCM should: (i) explicitly preserve the status of credits already issued, of CCP-Approved methodology versions, and of ongoing assessments at the time an instrument is adopted; (ii) ensure that grace periods are sufficient to allow programs to complete in-flight assessments under the prior rules; (iii) be explicit that the introduction of an instrument does not, by itself, justify a re-review of previously approved methodologies or programs; and (iv) limit the exception currently contemplated (where retroactivity is "expressly stated, separately justified, and subject to appropriate governance and safeguards") to a very narrow set of circumstances — for example, where a serious integrity risk is identified that cannot be adequately addressed prospectively — and require Governing Board approval in all such cases, as well as extensive private and public consultation with Programs. We accept that this principle will create differences between credit vintages, but this is strongly preferable to retroactive change, which would undermine confidence in the CCP-Approved label and create severe disruption for project developers, offtakers, and registries alike.
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 at predictable frequencies, in batches (e.g., twice per year).

Please explain your choice, if needed	Isometric strongly supports batched, predictable publication. As a CCP-Eligible Program, we operate a fixed protocol release cycle (currently every six months), and aligning ICVCM instrument releases with predictable batch windows allows us to incorporate changes systematically into each release rather than reactively. Rolling publication, by contrast, creates constant integration overhead, complicates communication with project developers and buyers, and risks producing a fragmented body of rules that is hard for the market to track. We would suggest two batches per year on dates known in advance (for example, tied to a published ICVCM annual workplan), with a narrow exception for genuinely urgent integrity issues that cannot wait for the next batch — and even then, ICVCM should commit to a defined fast-track process and notification protocol rather than allowing ad hoc rolling releases.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	ICVCM should adopt a transparent, criteria-based process for evaluating program requests, including: (i) the materiality and urgency of the issue (for example, whether ambiguity is causing inconsistent application across programs); (ii) the breadth of impact (whether the issue affects multiple programs or methodologies, or is narrow); (iii) supporting evidence of implementation difficulty or differing interpretations across the market; (iv) whether the issue can be addressed through existing guidance, FAQs, or companion documents rather than a new instrument; and (v) alignment with ICVCM's broader workplan, to avoid one-off responses that pre-empt more systematic review. Programs should receive a substantive response within a defined timeframe (e.g. 60 days) indicating whether the request will be progressed, declined, or considered later.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes

Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Other stakeholders that should be able to submit requests include: VVBs (who have direct experience implementing requirements during validation and verification); project developers (who see implementation issues first-hand); buyers and corporate purchasers of CCP-labelled credits; the scientific and academic community. ICVCM should apply the same factors set out in our response to Question 8, with the addition of: (i) confirmation that the requesting stakeholder has genuine standing or material exposure to the issue; (ii) consideration of conflicts of interest, particularly where a stakeholder might benefit commercially from a particular outcome; and (iii) weighting toward requests supported by evidence rather than position statements alone.
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?	We would highlight several areas where Interpretations, Technical Notices, or Clarifications may be a poor fit and where full Assessment Framework revision should be used instead: (i) requirements relating to the integrity of the underlying credit accounting framework (e.g. additionality, baseline-setting principles, leakage, permanence), where substantive change should not be possible through this lighter-weight process; (ii) requirements that define the eligibility of a project category or methodology type, since changes here would directly affect what can and cannot be credited; (iii) provisions defining governance, conflict-of-interest, or independence requirements for programs, which are foundational to the CCP-Approval threshold; (iv) the principles-level CCPs themselves, which by their nature express high-level commitments and should not be re-interpreted by instrument. More generally, we caution against using Interpretations to effectively expand the scope of an existing requirement: any change that meaningfully broadens what programs or projects must do should be treated as a substantive amendment requiring full revision rather than interpretation. To further reduce uncertainty around ICVCM's requirements, we would encourage greater oversight and direction of ICVCM experts. As a Program, the remit + decision-making authority of experts working on assessments is unclear, and it seems that experts can often come to differing assessments of the same requirements. This has introduced considerable uncertainty for us in the assessment process. It would be helpful for ICVCM to provide greater direction to experts to avoid this happening. In addition, it would be helpful to have clear professional standards for experts – we have experienced experts not turning up to calls to discuss very important Category assessment issues, which has materially impacted assessments. These measures would form part of an improved set of rulemaking processes, to help increase the certainty and stability of the ICVCM framework.

Name	Mrs. Omonigho Erigha
Are you responding as...	On behalf of an organisation
Organisation	Climate and Energy Policy Initiative
My organisation is...	An academic or research organisation
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?	The distinction between the three instrument types is clear. However, further explanation of how an Interpretation differs from a formal amendment to the Assessment Framework would be helpful. As currently defined, Interpretations and Technical Notices may affect how criteria and requirements are assessed and may affect the threshold for CCP-Approval or CCP-Eligibility, raising the question of whether programs and methodologies that were fully compliant prior to an Interpretation and Technical Notice could find themselves no longer meeting the eligibility threshold after its effective date. Greater clarity on what distinguishes an Interpretation and Technical Notice from a formal amendment would be crucial. In addition, since the effects of the Interpretation and Technical Notice will apply prospectively, it raises the risk that two credits carrying the same CCP label could have been issued under materially different eligibility criteria. In order to uphold and maintain the integrity of the CCP label, ICVCM may wish to consider requiring all existing affected CCP label holders to conform to any new evaluation criteria introduced through an Interpretation or Technical Notice within a specified timeframe, failing which their CCP status may be at risk. This would preserve the integrity and consistency of the CCP label across the market.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The primary factor should be the degree to which the instrument affects how criteria and requirements are assessed and the eligibility threshold for the CCP label. Where an instrument has no material effect on eligibility or assessment criteria, a Clarification is appropriate. Where it affects how criteria are assessed but still falls within the scope of a reasonable interpretation of the existing Assessment Framework, an Interpretation or Technical Notice may suffice. Where an instrument materially affects the eligibility threshold, the key factor in determining whether it should be processed as an Interpretation or a formal amendment should be the degree of effort required for previously approved CCP programs to conform to the new evaluation criteria. Where conforming requires minimal adjustment – for example, requirements to provide greater transparency or additional documentation – processing it as an Interpretation or Technical Notice with appropriate transition measures may be reasonable. However, where compliance would require significant operational, methodological, or financial changes from existing approved programs, or complete overhauls of existing methodologies, this is a strong indicator that the instrument is functioning as an amendment to the Assessment Framework and should be processed as such. Regardless of classification, existing CCP-approved programs should be required to comply with any new Interpretation or Technical Notice within a specified timeframe to ensure the consistency and integrity of the CCP label across the market.

For what types of technical updates do you think this system will work well, and where might it be less suitable?	This system works well for technical updates that fall within a reasonable interpretation of the existing Assessment Framework criteria and requirements, including updates to methods, parameters, and data sources that reflect developments in science and practice without requiring significant changes to how approved programs operate. It is also well suited to operational and procedural clarifications that reduce ambiguity and improve consistency of implementation across programs and methodologies. The system may be less suitable for updates that would require significant operational, methodological, or financial changes from existing approved programs.
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?	Grace periods should be provided for all Interpretations and Technical Notices given their potential to affect how criteria and requirements are assessed and the eligibility threshold for the CCP label. The appropriate length of a grace period should be determined by a reasonable estimate of the time it would take a diligent program to understand and comply with the new criteria introduced by the instrument. This necessarily varies depending on the nature of the change – minimal adjustments such as additional documentation or transparency requirements would warrant shorter grace periods, while changes requiring operational, methodological, or financial adjustments would warrant longer ones.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	The primary safeguard against harsh retroactive impacts is a grace period that gives existing programs adequate time to comply in good faith, and where an Interpretation or Technical Notice would require such significant changes that no reasonable grace period could cushion the impact, this could indicate that the instrument may be better proposed as a formal amendment to the CCP Assessment Framework.
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 at predictable frequencies, in batches (e.g., twice per year).
Please explain your choice, if needed	This would give programs clear timelines on when to expect the instruments and will make it easier to track these instruments.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an	Yes

Interpretation, Technical Notice or Clarification?	
What factors should ICVCM take into account in deciding whether to do so?	ICVCM should consider whether the CCP currently provides sufficient clarification on the issue and whether the market will benefit from greater clarity on the issue.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Researchers, civil society organisations, credit buyers, and the host communities should all be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification, as each brings a different perspective on how the Assessment Framework is working in practice. In deciding whether to act, ICVCM should consider whether the existing Framework provides sufficient clarity or whether the market would benefit from greater certainty on the issue.
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?	No specific CCP criteria or requirements stand out as unsuitable for this system. The three-tier architecture appears sufficiently flexible to accommodate the range of issues that are likely to arise across the Assessment Framework. The more important consideration, as noted in previous responses, is not which criteria are covered but how the system is applied. In particular, it is important to ensure that instruments that materially affect eligibility thresholds and require significant effort from existing approved programs to comply are processed as formal amendments rather than Interpretations or Technical Notices.

Name	**Dr. William Gochberg**
Are you responding as...	On behalf of an organisation
Organisation	Wildlife Works PBC
My organisation is...	A carbon project developer
How clear do you find the distinctions between the	Technical notices seem fairly straightforward. The line between an interpretation and a clarification seems less clear; a key difference appears to be whether introducing the instrument materially changes CCP-eligibility thresholds. Yet, any rule change

different instrument types: Interpretations, Technical Notices, and Clarifications? What, if anything, would benefit from further explanation?	could in theory make the difference between eligible and not eligible for a program/methodology, so in practice will the ICVCM err on the side of caution (i.e., using interpretations with accompanying consultations and grace periods vs. using a clarification)?
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	One factor should be market impact: developers are making multi-year investments based on how they understand ICVCM decisions and interpretations. This should be considered when deciding whether or not there needs to be a public consultation and/or grace period. Ideally, a developer would hope to proceed with project development under a program and methodology that will not be undergoing constant changes; and while ICVCM's instruments are not meant to be retroactive, a concern would be there will be market pressure not to issue under a methodology that is CCP-eligible but appears out of date compared to the latest CCP rule architecture.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	Technical updates (e.g., use of a specific factor in an emissions calculation) should ideally be widely applicable (or universal) across contexts, whether they be geographical, cultural, temporal, etc. They will be less suitable when context matters, e.g., emission factors from certain forest types. This is especially important for situations where there appears to be a possible universal approach (e.g., using a certain dataset for direct biomass emissions) that contains important, on the ground variability (e.g., how well that data performs in different biomes like dry miombo woodlands).
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?	The length should take into consideration where the burden of the changes fall (standards vs. developers), and whether those entities (esp. standards) have their own internal procedures for making the required changes. As noted above, developers and standards alike may feel pressure to update methodologies to align with the current state of the CCP architecture, even when the introduction of CCP instruments are not meant to be retroactive.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	What happens when a technical notice, e.g., results in methodological changes that significantly change ER calculations? Reputationally, it is hard to avoid the view that previous CCP-approved credits from this methodology are somehow out of date or exaggerated. The VCM as a whole has not managed to find a way to encourage continuous improvement while standing by the quality of older credits. The ICVCM could engage directly with buyers on this topic, and perhaps more importantly with governments which are increasingly creating the regulatory structure under which buyers make purchases and claims. If older CCP-labeled credits are allowed under such regulatory frameworks, it will go a long way to providing stability in the market.
In terms of your ability to keep up to date with ICVCM's work as it develops and publishes these	A mix of the above, depending on the urgency.

instruments, would your organisation find it easier to keep up to date if the changes were:	
Please explain your choice, if needed	If each of these instruments are meant to reduce uncertainty, rolling basis seems best, as long as 1) they are well communicated and 2) the grace periods and effective dates make sense. Where the introduction of an instrument does not cover those two conditions, its publication could be delayed until some regular date.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	If a technical notice brings a methodology into better alignment with best available science, or if there is an industry-wide norm that is not explicit in the current array of ICVCM documents, it makes sense for an eligible program to have the ability to make this request. However, ICVCM should be cautious to avoid cases where introducing an instrument creates an unfair competitive disadvantage between programs; obviously all programs should be incentivized to continuously improve to align with market best practices, but should also have equal opportunities to respond to rule changes.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Indigenous, Afro-descendant, and other local communities whose lives and livelihoods are affected by the downstream consequences of the CCP rule architecture, and who have historically been disadvantaged in a variety of ways, should be able to make these requests.
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?	

Name	**Mrs. Angela Duque**
Are you responding as...	On behalf of an organisation
Organisation	BioCarbon Cert
My organisation is...	A carbon-crediting program
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?	The distinction between the three instruments is generally clear. The main area where additional guidance would be helpful is the boundary between Interpretations and Technical Notices. Certain technical decisions may have implications for how requirements are assessed in practice, and greater clarity on the criteria used to select the appropriate instrument would improve predictability for carbon crediting programs. Additional guidance on how ICVCM will determine the significance and potential impact of a proposed instrument would also be beneficial.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	ICVCM's choice of instrument should be driven primarily by the nature and expected impact of the issue being addressed. Interpretations should be used where the matter affects the meaning, scope, or assessment of an existing requirement. Technical Notices should be used where the issue relates to technical parameters, methodologies, data sources, calculations, or other technical aspects of implementation. Clarifications should be limited to procedural, administrative, or operational matters that do not affect how requirements are assessed. The expected impact on CCP eligibility, methodology approval, ongoing assurance activities, or future assessments should be a key factor in determining the appropriate instrument.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The proposed system appears well suited for technical updates related to parameters, data sources, monitoring approaches, quantification methods, scientific developments, and other implementation issues that may evolve over time while remaining within the scope of existing Assessment Framework requirements. It may be less suitable where a proposed update has the practical effect of introducing new obligations, modifying the threshold for approval or eligibility, or creating substantive new requirements that were not reasonably foreseeable from the original Assessment Framework. In such cases, a broader consultation process and, where appropriate, a formal revision of the relevant provisions may be more appropriate.

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?	The need for a grace period should depend on the practical implications of the change. Where an Interpretation or Technical Notice requires updates to program documents, methodologies, tools, procedures, systems, or assurance processes, an appropriate transition period should be provided. The duration should reflect the effort required to implement the change and ensure consistent application by programs and other affected stakeholders. Changes with broader operational implications will generally require longer implementation periods than those with limited practical impact. The objective should be to facilitate effective implementation while maintaining predictability and avoiding unnecessary disruption.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	ICVCM should ensure that new instruments apply only to future assessments and assurance activities after their effective date. In addition, ICVCM should avoid situations where an Interpretation or Technical Notice has the practical effect of changing expectations for programs, methodologies, or activities that were developed, approved, or assessed under a previous version of the Assessment Framework. Clear effective dates, appropriate transition periods, transparent communication, and the preservation of existing CCP-Eligible and CCP-Approved statuses are important safeguards. Where a proposed instrument may have significant implications for existing programs or methodologies, ICVCM should provide a clear justification and consult affected stakeholders before adoption.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	Routine updates could be published at predictable intervals to facilitate planning and implementation by programs and other stakeholders. However, urgent matters may require more timely publication. Regardless of the approach adopted, ICVCM should maintain clear communication regarding new instruments, their effective dates, applicable transition measures, and their potential implications for programs, methodologies, and ongoing assurance activities.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing	Yes

an Interpretation, Technical Notice or Clarification?	
What factors should ICVCM take into account in deciding whether to do so?	ICVCM should consider the relevance and materiality of the issue, its potential impact on assessments, assurance activities, or CCP eligibility, and whether the matter affects more than one program, methodology, or project category. ICVCM should also consider whether the issue reflects a genuine ambiguity, inconsistency, or implementation challenge that could benefit from additional guidance, and whether addressing it would improve transparency, consistency, and predictability in the application of the Assessment Framework.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Other stakeholders should also be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification. This may include project developers, validation and verification bodies, technical experts, researchers, market participants, Indigenous Peoples and local communities, and other stakeholders affected by the implementation of the Assessment Framework. In deciding whether to proceed, ICVCM should consider the relevance of the issue, the supporting evidence provided, its potential impact on the integrity and implementation of the Assessment Framework, and whether the matter has broader implications beyond a single stakeholder or individual case.
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?	The proposed instruments may be less suitable where a change would effectively introduce new requirements or materially alter the threshold for CCP eligibility or approval. Particular care may be needed in areas such as additionality, baseline setting, permanence, double counting, and core program governance requirements, where even relatively small interpretative or technical changes may have significant implications for programs, methodologies, and market participants. In such cases, ICVCM should carefully assess whether an Interpretation or Technical Notice is sufficient, or whether a broader review or formal revision process would be more appropriate.

Name	Mr. Nate Van Beilen
Are you responding as...	An individual
Organisation	n/a
My organisation is...	n/a
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?	Interpretations and technical notice seem to overlap in terms of potential impacts. The examples are helpful for understanding the distinction.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	How well the topic aligns with the established description of an Interpretation, a Technical Notice, and a Clarification, but also the magnitude or materiality of the update.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	
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?	Magnitude or materiality of the update. Having pre-set grace periods may not work for certain protocols or project types where updates might require project design changes. Maintaining flexibility for how to define grace periods would make sure project proponents have sufficient time to make updates, and/or for programmes to update rules/protocols.

The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Ensure that the CCP label remains consistent and that there are not multiple tiers of the CCP label based on when rule architecture changes occur.
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.
Please explain your choice, if needed	
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	Probably should limit requests to technical notices and clarifications, not interpretations.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Primarily NGOs or government coalitions for which conflict of interests or profit motives are not a driving for requesting introduction of an Interpretation, Technical Notice, or Clarification.

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?	Robust quantification, permanence and additionality as they are fundamental to project design. These are already challenging areas from an assessment

Name	**Mrs. Ruth Perez**
Are you responding as...	An individual
Organisation	n/a
My organisation is...	n/a
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?	En México NO estan claros los instrumentos, por ejemplo los fiscales, la interpretación es muy limitada, la SEMARNAT en México no avanza tecnicamente y obviamente el mercado NO se desarrolla con certeza jurídica, primordial para impulsar el mercado
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	Deberia ser EXIGIBLE México que genere las directrices EXACTAS de la operación del mercado voluntario y hacerlo extensivo
For what types of technical updates do you think this system will work well, and	Las actualizaciones normativas, que el ICVCM pueda influir en que los lineamientos normativos esten desarrollados y claros para su correcta aplicación.

where might it be less suitable?	
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?	Que existan los reglamentos, guias tecnicas, rutas criticas a seguir para la verificación y frenar cualquier tipo de CORRUPCION o ROBO de informacion al respecto.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Definir PERFECTAMENTE la linea de INICIO Y APLICACIÓN de los criterios tecnicos y NORMATIVOS.
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 at predictable frequencies, in batches (e.g., twice per year).
Please explain your choice, if needed	Deberian informar CALENDARIZADAMENTE los AVANCES y resultados y la vigencia y aplicacion de los mismos.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	No
What factors should ICVCM take into account in deciding whether to do so?	

Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Los dueños de los recursos naturales, los investigadores reconocidos, el Estado de cada pais
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?	no

Name	**Mr. Joseph Gituma**
Are you responding as...	An individual
Organisation	n/a
My organisation is...	n/a
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?	The distinctions between Interpretations, Technical Notices, and Clarifications are generally understandable, but there is still some overlap that can cause confusion, especially in practical application. It would be helpful to provide clearer definitions with real-world examples for each category. In particular, guidance on how to apply each instrument type in decision-making situations would improve consistency and reduce misinterpretation

What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification should be guided by the nature of the issue, its regulatory impact, and the level of change required. Interpretations should be used where there is a need to explain or resolve ambiguity in the Core Carbon Principles or their application in a way that may influence how requirements are understood. Technical Notices should be used for more detailed, operational guidance that supports implementation and ensures consistent application of technical methodologies or procedures. Clarifications should address minor uncertainties, terminology questions, or administrative points that do not change the underlying meaning or requirements. Additional factors should include the urgency of the issue, the potential impact on market participants, and the need for consistency across different carbon standards and jurisdictions."
For what types of technical updates do you think this system will work well, and where might it be less suitable?	**"This system is likely to work well for technical updates that require structured communication and consistency, such as methodological refinements, implementation guidance, eligibility criteria clarification, and updates that affect monitoring, reporting, and verification processes. It is also suitable for addressing emerging issues in carbon accounting where harmonized interpretation is needed across different programs. However, it may be less suitable for highly complex policy reforms, rapidly evolving scientific debates without consensus, or situations requiring immediate operational changes across multiple stakeholders, where a more flexible or emergency communication mechanism may be needed. It may also be less effective where updates require extensive stakeholder negotiation or iterative co-development rather than formal issuance."**
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?	**"The need for a grace period before entry into force should be guided by the scale of operational change required, the readiness of affected stakeholders, and the potential market disruption caused by immediate implementation. If updates require system adjustments, methodological revisions, retraining, or changes to verification processes, a grace period is more likely to be necessary. The complexity of the change and the number of stakeholders affected should also be considered, along with alignment to existing reporting cycles and project timelines. The length of the grace period should reflect the time reasonably needed for implementation without undermining environmental integrity. Shorter periods may be appropriate for minor or clarifying updates, while longer periods are justified for substantial methodological changes or where systems integration is required. Predictability, fairness, and minimizing disruption to ongoing projects should be key principles when determining duration."**
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	**"To avoid retroactive effects, ICVCM should ensure that new rules are applied only to future activities and clearly define the 'point of application' (e.g., project registration date, crediting period start, or verification cycle). Clear transitional provisions are essential to protect decisions already made under previous rules and to maintain legal and market certainty. Key safeguards should include explicit grandfathering clauses where appropriate, clear version control of standards, and transparent cut-off dates communicated well in advance. ICVCM should also assess the potential impact on existing projects

	and avoid changes that would undermine valid expectations or contractual arrangements. Additionally, stakeholder consultation and sufficient lead time before implementation can help identify unintended retroactive effects early. Consistency across related standards and documentation is also important to prevent indirect retroactive impacts arising from interpretative inconsistencies."**
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	The answer I provided is structured around a core principle of regulatory design: rules should govern future actions, not rewrite the consequences of past ones. In carbon markets, this matters because projects, credits, and investments are often planned years in advance based on a stable set of rules. So the response is built on a few key ideas: First, clear application points are essential. Without defining whether a rule applies from registration, crediting start, or verification, you risk accidental retroactivity where older projects are judged by new standards. Second, transitional safeguards like grandfathering and cut-off dates protect trust in the system. If participants fear that completed actions could later become non-compliant, investment confidence drops. Third, predictability and fairness are central to carbon markets. Even if a new rule is technically better, applying it backwards can undermine legitimate expectations and contracts that were made under earlier rules. Finally, early consultation and lead time reduce the risk of hidden or indirect retroactive effects, where changes look forward-looking but still impact past decisions in practice.

	In short, the answer prioritizes legal certainty, market stability, and fairness while still allowing ICVCM to improve standards over time.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	**"In deciding whether to proceed (or to take a specific approach such as issuing guidance, allowing a transition period, or applying safeguards against retroactivity), ICVCM should consider a broad set of stakeholders and the practical impact on each group. Key stakeholders include project developers, carbon credit buyers (including corporates and intermediaries), validation and verification bodies, standard-setting organizations, registries, local communities hosting projects, and national regulators or policymakers. Each of these groups may be affected differently in terms of financial exposure, compliance obligations, and operational adjustments. Key factors to consider include the materiality of the proposed change, the level of disruption to ongoing or already-validated projects, and the potential impact on market confidence and investment stability. ICVCM should also assess environmental integrity outcomes, ensuring that decisions do not weaken the credibility of carbon credits. Legal certainty, contractual commitments, and alignment with existing methodologies across standards are also important. Finally, ICVCM should consider timing, implementation capacity, and whether sufficient consultation has taken place to avoid unintended consequences for any stakeholder group."**
Are there any specific CCP criteria or requirements for which Interpretations, Technical Notices or	Yes. There are some CCP-related areas where Interpretations, Technical Notices, or Clarifications may be a poor fit because the underlying rule is too structural, value-laden, or consequential to be safely "refined" through guidance-type instruments. **"Interpretations, Technical Notices, and Clarifications work best where they explain or operationalise existing requirements.

Clarifications might not work well, due to the nature of the existing rule?	They may be less suitable for CCP criteria that are foundational, highly normative, or require formal rule change rather than interpretation. For example, criteria related to core environmental integrity principles (such as additionality, permanence, or robust baseline setting) may not be appropriate for incremental clarification if the change would effectively alter the threshold of compliance rather than explain it. Similarly, eligibility rules that determine whether a credit is valid at issuance, or requirements that materially affect credit quality, may require a formal revision process rather than guidance instruments. These tools may also struggle where requirements are tightly embedded in methodological accounting frameworks across multiple standards, and where even small wording changes could create inconsistencies or unintended loopholes. In such cases, reliance on Interpretations or Clarifications could risk de facto rule changes without sufficient consultation or due process. Therefore, areas involving material credit integrity thresholds, cross-standard harmonisation, or significant market impact are better handled through formal amendments rather than interpretive instruments.”**

Name	**Mr. TIAGO ANTONIO DE ALMEIDA**
Are you responding as...	On behalf of an organisation
Organisation	TrackGains Sustainable Solutions LTDA
My organisation is...	A carbon project developer
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?	The distinction is generally understandable, with Interpretations providing normative guidance, Technical Notices addressing methodological and implementation issues, and Clarifications resolving specific questions without altering underlying requirements. However, additional explanation would be beneficial regarding the legal and operational implications of each instrument, particularly how they interact with existing CCP requirements, approved methodologies, and validation/verification processes. A practical decision tree and illustrative case studies would improve consistency of interpretation among project developers, validation bodies, registries, investors, and market participants.
What factors should influence ICVCM’s choice between an Interpretation, a Technical Notice, and a	The primary factors should be: * The materiality of the issue to environmental integrity and market confidence. * Whether the topic introduces new interpretive guidance or merely explains existing requirements. * The potential impact on ongoing projects, credit issuance, and investment decisions.

Clarification for a given topic?	* The need for technical expertise and methodological assessment. * The urgency of market guidance. Clarifications should be reserved for narrow and straightforward questions. Technical Notices should address implementation challenges, methodological refinements, and evolving scientific knowledge. Interpretations should be used when there is a need to establish authoritative guidance affecting the application of CCP requirements across multiple programs, methodologies, or market segments.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The proposed system is well suited for technical updates that require standardization, interoperability, transparency, and clear traceability across carbon crediting programs. Examples include updates related to monitoring, reporting and verification (MRV) methodologies, data quality requirements, registry integration standards, disclosure protocols, and governance procedures where consistency and comparability are critical. It may be less suitable for highly innovative or emerging methodologies that are still evolving rapidly, particularly where scientific consensus has not yet been reached or where project-specific circumstances require significant flexibility. In such cases, a more adaptive or phased implementation approach may be preferable to avoid unintended barriers to innovation while maintaining environmental integrity.
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?	The need for a grace period should be determined by the complexity of implementation, the level of system changes required by market participants, and the potential impact on existing projects and transactions. Key considerations include updates to MRV systems, registry infrastructure, validation and verification processes, contractual arrangements, and compliance procedures. For material technical changes, a grace period of 12 to 24 months would generally provide sufficient time for market participants to adapt while preserving market stability. For minor procedural or administrative updates, shorter transition periods may be appropriate. A risk-based approach that balances implementation feasibility with environmental integrity would be most effective.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	ICVCM should prioritize legal certainty, market stability, and investor confidence when designing safeguards against retroactivity. Key measures include: (1) grandfathering provisions for projects and credits issued under previously approved methodologies; (2) clear transition periods before new requirements become effective; (3) transparent materiality thresholds to distinguish minor updates from changes requiring re-assessment; (4) protection of legitimate expectations for project developers, investors, and buyers who relied on existing rules; (5) risk-based review mechanisms focused on environmental integrity concerns rather than automatic retroactive application; and (6) advance notice and stakeholder consultation before implementation. These safeguards help maintain trust, avoid market disruption, and preserve the long-term bankability of climate projects while still allowing continuous improvement of standards.

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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	As a sustainable finance and climate project infrastructure provider, TrackGains supports a hybrid approach. Material changes impacting project eligibility, MRV requirements, risk assessment, or market integrity should be released immediately to preserve transparency and trust. Operational or administrative updates can be grouped into scheduled releases, allowing market participants, developers, investors, and assurance providers sufficient time for implementation and system adaptation. This balance improves both predictability and responsiveness across the carbon market ecosystem.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	ICVCM should consider introducing an Interpretation, Technical Notice, or Clarification when there is evidence of material ambiguity, inconsistent application across programs, methodologies or validation bodies, or when emerging scientific, regulatory, technological, or market developments create uncertainty regarding CCP implementation. Key factors should include: * The potential impact on environmental integrity and market confidence. * The risk of inconsistent interpretation among registries, validation and verification bodies (VVBs), project developers, and market participants. * The availability of new scientific evidence, data sources, monitoring technologies, or best practices. * Alignment with evolving international frameworks, regulations, and carbon market governance standards. * The urgency of providing guidance to avoid delays, disputes, or unintended barriers to high-quality climate mitigation activities. * The need to maintain comparability, transparency, and predictability across CCP-approved programs and methodologies.

	ICVCM should also assess whether clarification would improve market efficiency while preserving environmental and social safeguards, additionality, permanence, and robust MRV requirements.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	ICVCM should consider a broad range of stakeholders, including project developers, standard bodies, validation and verification bodies (VVBs), investors, corporate buyers, indigenous peoples and local communities (IPLCs), regulators, scientific experts, and digital MRV providers. In deciding whether to issue Interpretations, Technical Notices, or Clarifications, ICVCM should evaluate: * The potential impact on environmental integrity and market confidence. * The need to reduce ambiguity while preserving methodological rigor. * Consistency with existing CCP principles and approved methodologies. * Potential consequences for project viability, especially in developing countries and emerging markets. * Scientific evidence and technological advancements, including digital MRV, remote sensing, and data transparency tools. * The balance between regulatory certainty and innovation. * Risks of unintended market distortions, exclusion of high-impact projects, or barriers to participation for small and medium-scale project developers. A transparent consultation process with public disclosure of rationale, stakeholder feedback, and expected implementation impacts should accompany any Interpretation, Technical Notice, or Clarification.
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?	Yes. One area where Interpretations, Technical Notices or Clarifications may not be sufficient is the assessment of sustainable development safeguards, stakeholder engagement, and social integrity requirements. These topics often depend on local context, cultural factors, indigenous and community rights, and project-specific circumstances that cannot always be fully addressed through guidance documents alone. In some cases, the underlying rule architecture may require more explicit criteria, measurable indicators, or minimum evidence requirements to ensure consistent application across programs and geographies.

	Similarly, requirements related to additionality, permanence risk assessment, and leakage management may benefit from clearer operational thresholds within the core rules themselves rather than relying primarily on interpretative guidance. Excessive dependence on interpretations can create inconsistency between programs, auditors, and project developers, potentially reducing market confidence and comparability. A balanced approach would be to use Interpretations and Technical Notices for operational clarification while maintaining critical integrity requirements directly within the CCP rule framework, particularly where environmental and social outcomes materially affect credit quality.

Name	**Mr. Kyann Hadife**
Are you responding as...	An individual
Organisation	n/a
My organisation is...	n/a
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?	The distinctions between the three instrument types are clear and well-explained in the consultation document.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The primary factor should be whether the instrument changes how criteria and requirements are assessed, which determines Tier 2 versus Tier 3. Beyond that, ICVCM should weigh the magnitude of the change, specifically the volume of credits and tonnes potentially affected. This naturally maps to the level at which the instrument operates: a CCP-level instrument has the broadest market impact, a methodology-level instrument affects all projects under that methodology, and an operational instrument has the narrowest reach. The choice of instrument type should reflect this hierarchy, with broader-impact changes receiving more governance weight, more consultation, and more prominent communication to market participants. Making this hierarchy explicit would also help market participants calibrate how much attention a given instrument warrants.

	An enterprise buyer or platform integrating CCP status into sourcing decisions needs to know at a glance whether an instrument is a market-wide signal or a narrow procedural update. Structuring instrument classification around magnitude and level of application would provide that signal.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The system will work well for narrow, bounded technical updates: specifying a particular parameter, updating a reference data source, or clarifying a procedural documentation requirement that doesn't affect how a project's emissions reductions are quantified. It will also work well for operational Clarifications that address genuine ambiguity without changing the substance of a requirement. It is less suited for issuing instruments during the window when project developers are actively redesigning projects to conform to a recently issued methodology change, roughly 30 days to one year after issuance. During this period, developers are making real investment and design decisions based on the current rules. Introducing a new instrument mid-way through that adaptation window, even with a grace period, creates confusion and potential whiplash that undermines the stability the instrument system is meant to preserve. ICVCM should consider a moratorium on instruments affecting a given methodology during this window. More broadly, we recommend ICVCM adopt explicit quantitative thresholds to guide when a formal Assessment Framework revision is warranted rather than an instrument: if an update would affect credits or tonnes above a defined volume, projects above a defined number, or methodologies above a defined count, it should trigger a formal revision rather than be handled through the instrument system.
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?	race period length should be guided by three main factors. First, how long it has been since the affected methodology or decision was implemented. A methodology approved recently is more likely to have active projects mid-development that need time to adapt. A methodology that has been in place for several years has a more mature project base that is better positioned to absorb changes with a shorter transition window. Second, the technology type and its development timelines. Different project types have fundamentally different cycles for implementing changes. An ARR project, for instance, involves long-term land use planning, physical plot design, and multi-year monitoring commitments that make rapid adaptation difficult. A biochar project, by contrast, can typically adjust operational parameters much faster. Grace periods should reflect those realities rather than applying a uniform timeline across all project types. Third, the nature of the change itself. A purely quantification-based change, such as updating a emission factor or calculation parameter, is generally easier to implement and warrants a shorter grace period. A change that requires physical redesign of a project, such as modifying sample plot design or monitoring infrastructure, demands significantly more lead time and should receive a longer grace period accordingly.

The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	We welcome ICVCM's commitment to avoiding retroactive effects, which is critical for maintaining market confidence and protecting the commercial commitments that buyers and sellers have made on the basis of the CCP label. The prospective-only principle is the right foundation. Our recommendations focus on strengthening it. However, the rule as currently designed operates at the program and methodology level, not at the individual credit level. This is insufficient. Safeguards should include: First, an explicit commitment that already-issued CCP-labeled credits retain their label regardless of subsequent assurance outcomes under new instrument requirements, unless the program was found to have committed fraud or misrepresentation. Second, a clear definition of what "retroactive" means at the credit level specifically, not only at the program or methodology level. Buyers transacting today need to be able to demonstrate, in future audits or disclosures, that the credits they purchased complied with the rules that were current at the time of issuance. Without versioning and credit-level traceability, the prospective-only principle cannot be verified or relied upon in practice. Third, a distinction in the assurance process between non-compliance with new instrument requirements (which is prospective) and non-compliance with pre-existing requirements that a Clarification has simply made explicit. The latter raises different questions about the validity of prior approvals that the document does not currently address. That said, we recognize that some degree of flexibility for retroactive changes may be warranted in exceptional circumstances. We recommend that such flexibility be reserved exclusively for formal revisions to the Assessment Framework itself, subject to full governance and consultation processes, rather than exercised through the instrument system. This would preserve the integrity of the prospective-only principle at the instrument level while allowing ICVCM to address fundamental issues through the appropriate channel when necessary.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	Patch strongly prefers predictable batch publication for non-urgent instruments, ideally twice per year on a fixed schedule. Our own integrity criteria are updated on the same cadence, with a rolling process for urgent ad-hoc changes, and are directly pegged to the CCPs. When ICVCM rejects a methodology or issues additional guidance, we adjust our internal integrity framework accordingly and communicate those changes to over 200 enterprise clients. Being able to synchronize our update cycle with ICVCM's publication schedule, for both regular and ad-hoc instruments, would materially improve how consistently and accurately we reflect CCP requirements across our platform. For genuinely urgent instruments, a fast-track pathway is appropriate. However, ICVCM should define what constitutes

	urgency, publish that definition, and notify affected stakeholders directly rather than relying solely on website publication. Urgency should be the exception, not the default. Urgency can be defined as a function of how many credits/methodologies/projects are affected.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Registries, since they will be responsible for labeling. Rating agencies and intermediaries, as surfacing information on CCP-eligibility is increasingly important. It is often requested in an ex-ante fashion (will this project likely be labeled at issuance), so it is important to understand what would influence that decision.
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?	1. Credit-Level Label Status and the Assurance Pathway The prospective-only rule protects program and methodology approvals, but not individual credits. If a program fails a future assurance cycle under updated instrument requirements, the fate of already-issued credits is unaddressed. ICVCM should clarify whether already-issued CCP-labeled credits can lose their label as a downstream consequence of assurance failure, and if so, what the process and notification obligations would be. 2. Versioning, Changelogs, and Instrument Traceability The document commits only to making instruments "clearly visible" on the ICVCM website. There is no proposed version numbering system, changelog structure, or formal notification mechanism. As instruments accumulate, market participants will have no reliable way to determine which rules governed a specific assessment at a specific point in time, or when a prior instrument was superseded. ICVCM should adopt formal version numbering, a consolidated dated changelog, and a structured instrument register. 3. Instrument Cadence and Periodic Review

	The document proposes no publication schedule or review cycle. ICVCM should commit to a predictable cadence (e.g. twice per year for non-urgent instruments, with a fast-track pathway for urgent ones) and an annual review of the existing instrument library. This is particularly important for incremental changes too minor to trigger an eligibility reassessment or a formal CCP revision, but that still accumulate over time and need to be actively managed. 4. Clarifications and Pre-Existing Non-Compliance Because Clarifications explain what a requirement always meant rather than introduce new obligations, their issuance can implicitly reveal that some programs or projects were never compliant as intended. The document provides no mechanism to address this: Clarifications apply prospectively, do not trigger reassessments, and carry no remediation process. ICVCM should clarify how pre-existing non-compliance revealed by a Clarification will be handled. 5. Consolidation Into Versioned CCPs/AF Rather Than a Parallel Instrument Library We support the governance triaging framework as designed, but propose that the output of that process feed into versioned updates of the CCPs and Assessment Framework rather than a standalone instrument library. This would preserve the speed and proportionality benefits of the instrument system while keeping the CCPs as the single authoritative source of truth, fully auditable and comparable across versions. A parallel rulebook that grows indefinitely risks fragmenting the standard and making stability an excuse for avoiding accountability. Versioned Af rather than an instrument library. Predictable schedule of publications, annual review. Clarity on clarifications and whether it could mean that previously assessed programs were incompliant.

Name	**Mr. Zerihun Arerso**
Are you responding as...	An individual
Organisation	
My organisation is...	
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?	That's good because it's inclusive

What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	It's because of the people understanding and depends on the expertise
For what types of technical updates do you think this system will work well, and where might it be less suitable?	For people expertise it works well and for those not expertise might be less
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?	Three months
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Be inclusive
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	Urgency matters

Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	The condition
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	People who not expertise
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?	No

Name	**Mr. Nick Marriott**
Are you responding as...	An individual
Organisation	
My organisation is...	

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?	na
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	na
For what types of technical updates do you think this system will work well, and where might it be less suitable?	na
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?	Nothing should be entered into force. This should not be needed if the technology and science are sound and add value to society without creating additional problems. If it needs force, then it is not a solution.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	na
In terms of your ability to keep up to date with ICVCM's work as it develops and	It is not important to my organisation.

publishes these instruments, would your organisation find it easier to keep up to date if the changes were:	
Please explain your choice, if needed	Anything that needs additional taxes and needs to be forced makes it an irrelevant pursuit. Change the approach and then it might be relevant.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	na
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	na
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?	na

Name	Mr. Gabriel Addai Duah
Are you responding as...	On behalf of an organisation
Organisation	DigiGreen Impact
My organisation is...	A consultancy services provider
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?	From an ESO perspective, the conceptual distinctions are broadly logical but not immediately intuitive to non-specialist actors. The differentiation between an Interpretation (which carries binding weight) and a Clarification (which does not) is consequential for how ventures plan, yet this distinction is unlikely to be apparent to an early-stage African green venture or its support organisation without explicit guidance. We would recommend that ICVCM publish a plain-language companion summary – one page, non-technical – that maps each instrument type to practical examples of when it would apply and what it means for a project developer or methodology user. This would significantly improve accessibility for actors outside the established carbon market ecosystem.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The primary factor should be consequence – specifically, whether the instrument changes, confirms, or merely communicates existing requirements. Where the practical effect on project developers or methodology applicants is material, an Interpretation with full consultation is warranted. Where the issue is genuinely operational or procedural with no substantive rule change, a Clarification is sufficient. A second factor should be urgency relative to market stability – rapid-response instruments that carry binding effect risk disrupting projects already in development, particularly in markets like sub-Saharan Africa where regulatory uncertainty already constrains participation. The choice of instrument should therefore also consider the geographic and capacity context of affected stakeholders, not only the technical nature of the issue.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The system is well-suited to resolving ambiguities in existing methodology requirements, addressing emerging science or data standards that do not require reopening primary rules, and communicating procedural updates. It is likely less suitable where the underlying issue reflects a genuine gap or conflict in the primary rules themselves – in those cases, routing through Technical Notices risks creating layered complexity without resolving the root problem. From an African ESO standpoint, the system may also be less effective where the issue originates from implementation challenges in emerging markets – contexts that may not surface through established program or stakeholder channels unless ICVCM actively creates pathways for ground-level input.
What factors should guide whether a grace period is needed before entry into force on the effective date	Grace periods should be calibrated to the complexity of the change and the capacity of affected actors to adapt. For project developers and ESOs operating in lower-capacity contexts – including much of sub-Saharan Africa – even operationally straightforward updates may require longer adjustment periods due to limited access to real-time regulatory monitoring, advisory support, and implementation resources. We recommend that ICVCM adopt a minimum default grace period for any

and how long such a grace period should be?	instrument that affects project eligibility or methodology application, with extended periods available where the affected stakeholder population includes actors in emerging markets. The burden of demonstrating that no grace period is needed should rest with ICVCM, not with the stakeholder.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	ICVCM should establish a clear presumption against retroactivity, with any exceptions requiring explicit justification and Governing Board approval. From an African ESO perspective, retroactive rule changes are particularly damaging in contexts where ventures have made investment or partnership decisions based on existing CCP requirements – often with limited access to legal or compliance advisory support to manage the adjustment. Key safeguards should include: a mandatory assessment of whether any new instrument affects projects already in development or validation; transparent publication of the effective date well in advance; and a right for affected stakeholders to raise concerns before an instrument takes effect. The integrity of the rule architecture depends as much on trust and predictability as on technical correctness.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	For ESOs and early-stage ventures in sub-Saharan Africa, predictable batch publication is generally preferable – it allows organisations with limited regulatory monitoring capacity to stay current without requiring continuous tracking. However, where an instrument addresses an active compliance ambiguity or an urgent market integrity issue, timely publication should not be held back for a batch cycle. We therefore support a mixed approach, with ICVCM publishing urgency criteria transparently so stakeholders understand when to expect rolling updates versus scheduled releases. Predictability should be the default; urgency the exception.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	With appropriate safeguards, ICVCM should consider: whether the issue raised reflects a genuine ambiguity or gap in existing rules rather than a preference for a particular interpretation; whether the requesting program has a material and direct stake in the matter; and whether addressing the issue through a formal instrument serves the broader market rather than a single program's interests. Requests should be logged and responded to transparently, even where ICVCM declines to act, to maintain

	accountability and discourage selective engagement with well-resourced programs at the expense of smaller or emerging-market actors.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Yes. Beyond CCP-Eligible Programs, the following stakeholders should have a formal channel to raise requests: civil society organisations, Indigenous Peoples and local community representatives, ESOs and incubators supporting green ventures, and research institutions with relevant expertise or have access or can collect relevant data . These actors often observe implementation challenges and rule ambiguities at ground level before they surface through program channels. In deciding whether to act on a request, ICVCM should consider: whether the issue raised reflects a genuine gap or ambiguity with broader market relevance; whether it is grounded in documented implementation experience rather than advocacy preference; and whether the requesting stakeholder represents a constituency that would otherwise lack visibility in the rule-making process. ICVCM should publish a simple, accessible request mechanism and commit to acknowledging and responding to all submissions, even where no instrument is issued. This is essential to building trust with stakeholders outside the established VCM ecosystem, including those operating in African and other emerging markets.
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?	DGI does not have sufficient technical depth in the Assessment Framework criteria to identify specific rules where these instruments would be structurally unsuitable. We note, however, that criteria involving qualitative judgments – such as those related to community benefit, environmental integrity, or additionality in complex land-use contexts – may be difficult to resolve through Technical Notices or Clarifications alone, given their inherently context-dependent nature. In such cases, the risk is that instruments create false precision, narrowing interpretation in ways that disadvantage projects in diverse African contexts. We recommend that ICVCM flag such criteria explicitly and consider whether broader stakeholder consultation, rather than a lighter-touch instrument, is more appropriate for addressing ambiguities in those areas.

Name	**Mr. Aya Yamazaki**
Are you responding as...	On behalf of an organisation
Organisation	JGC Holdings

My organisation is...	A carbon project developer
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?	The distinctions between Interpretations, Technical Notices, and Clarifications are broadly understandable at a conceptual level. However, in practice, the boundary between Interpretations and Technical Notices remains insufficiently clear. Both have the potential to affect assessment outcomes and, in effect, raise thresholds for CCP-eligibility. Further clarification would be beneficial on: the criteria used to determine when a topic requires an Interpretation versus a Technical Notice; and the limits of Interpretations, particularly to ensure they do not become a mechanism for de facto tightening of requirements without an appropriate level of scrutiny. Such clarification would help ensure predictability and avoid unintended escalation of requirements.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The choice of instrument should be guided by the principles of proportionality and necessity. In addition to technical considerations, ICVCM should explicitly assess: the potential impact on credit supply, implications for market participation, and effects on climate finance flows, particularly to developing countries. Where an Interpretation or Technical Notice could materially affect project feasibility or exclude otherwise viable mitigation activities, ICVCM should assess whether such impacts are justified from the perspective of overall climate objectives. In particular, the choice of instrument should reflect the need to maintain an appropriate balance between the rigour of additionality and related considerations and the broader effectiveness and scalability of carbon markets.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The proposed system is well suited for: – clearly defined technical parameters, – data-related or methodological adjustments, and – operational clarifications with limited interpretative uncertainty. However, it may be less suitable for areas involving: – significant judgment or uncertainty, – context-specific interpretation, and – strong dependence on assumptions. Such areas include: additionality, – baseline setting, and – sustainable development contributions.

	In these domains, overly prescriptive or rigid interpretations risk constraining methodological diversity and reducing the ability of carbon markets to support mitigation and finance at scale.
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?	Grace periods should be applied where a rule document has a material impact on assessment outcomes or project viability. The need for and length of a grace period should be determined based on: – the extent of expected impact on credit supply, – the time required for projects to adapt, – typical project development and investment cycles, and – risks of abrupt market disruption. Grace periods should not only facilitate compliance but also ensure continuity of investment and project development.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Avoiding retroactivity is critical for maintaining market confidence and investment stability. ICVCM should consider: – strict adherence to prospective application as a default principle, – clear and transparent justification where any exception is considered, – protection of already registered or approved projects, and – avoidance of sudden changes that could undermine project economics. Where interpretation changes significantly affect assessment outcomes, safeguards should ensure that existing investments are not adversely impacted.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	A mixed approach is preferred because: – urgent or high-priority updates may require timely publication on a rolling basis; – however, predictable and periodic updates improve transparency and planning for market participants. Combining both approaches allows flexibility while maintaining predictability. In particular: – material changes affecting supply or project development should be – communicated with sufficient advance notice; – periodic consolidation of updates would improve clarity and reduce fragmentation.

Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	CCP-Eligible Programs should be allowed to request the introduction of rule documents, as they have direct insight into implementation challenges and supply-side impacts. In assessing such requests, ICVCM should consider: – whether the issue has broader market relevance, – the potential impact on credit supply and project feasibility, and – whether the request addresses unintended consequences of existing interpretations.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Requests should also be accepted from a broader set of stakeholders, including: – project developers, – credit users (corporates), – investors, and – stakeholders from developing countries. In evaluating such requests, ICVCM should consider: – the representativeness of the stakeholder, – the practical relevance of the issue raised, and – the potential implications for market functionality and climate finance flows. Ensuring participation from developing country stakeholders is particularly important, given the role of carbon markets in channeling finance.
Are there any specific CCP criteria or requirements for which Interpretations, Technical Notices or Clarifications might not work	Certain CCP criteria may not be well suited to treatment through Interpretations, Technical Notices, or Clarifications due to their inherent nature. These include areas that rely heavily on: – context-specific judgment, – evolving scientific or economic assumptions, and

well, due to the nature of the existing rule?	– inherently uncertain counterfactuals. Examples include: – additionality, – baseline setting, and – sustainable development contributions. Applying increasingly strict or detailed interpretations in these areas through rule documents may risk: – reducing credit supply, and – weakening the role of carbon markets in delivering mitigation and climate finance. For such criteria, ICVCM should adopt a cautious approach and explicitly ensure a balance between the rigour of additionality and related considerations and overall market effectiveness and scalability.

Name	**Mr. SAI SRINIVAS YEDDU**
Are you responding as...	On behalf of an organisation
Organisation	PRAMAANONE
My organisation is...	A carbon project developer
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?	The distinctions are currently too qualitative. From a digital infrastructure and engineering perspective, regulatory instruments should ideally map to "Semantic Versioning" concepts (e.g., Major, Minor, Patch). We recommend defining these instruments strictly by their technical impact on data pipelines: e.g., does an "Interpretation" require a fundamental rewrite of telemetry ingestion logic, whereas a "Clarification" only impacts front-end reporting? Establishing a strict technical matrix would remove ambiguity for software and hardware developers.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The primary factor should be the "Time-to-Deploy" impact on underlying MRV infrastructure. If the change alters how raw data is collected at the edge or mathematically verified (e.g., requiring new sensor types or cryptographic hash parameters), it must be a major Technical Notice.

	If the change only affects how previously collected data is aggregated or labeled for auditors, a Clarification or Interpretation is sufficient.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	This system will work exceptionally well for policy, methodology definitions, and administrative workflows. It is less suitable for hardware-level security mandates or real-time telemetry standards. Updates affecting physical edge nodes (like Trusted Execution Environments) or WORM (Write-Once-Read-Many) ledger architectures cannot be deployed swiftly through "Notices" without risking network downtime.
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?	Grace periods must be dictated by hardware and software deployment lifecycles. While software updates can be pushed globally overnight, physical dMRV hardware deployments at industrial sites (smelters, solar grids) require site visits, physical security audits, and hardware recertification. Any rule affecting edge data collection should have a minimum grace period of 6 to 12 months to allow for physical infrastructure updates without disrupting current carbon accounting cycles.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	ICVCM must adopt a strict principle of "Data Grandfathering." High-integrity digital systems generate unalterable mathematical proofs of data integrity at the exact timestamp of collection. If a credit was generated and cryptographically sealed under the rules present at timestamp X, that specific data block must remain permanently valid under those historical parameters, even if a subsequent Interpretation changes the baseline rules at timestamp Y.
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 at predictable frequencies, in batches (e.g., twice per year).
Please explain your choice, if needed	Technology infrastructure providers build development roadmaps in predictable quarterly or bi-annual planning cycles. Continuous rolling updates create compliance instability, forcing engineering teams to constantly divert resources to system patches. Predictable batch updates allow technology providers to align software releases and hardware maintenance schedules systematically with ICVCM's regulatory updates.

Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	Advanced data infrastructure and digital verification providers should have a direct request channel. If the engineering layer identifies a newly emerging systemic vulnerability or develops a more precise telemetry validation method, they require a mechanism to alert ICVCM to issue a Technical Notice. Factors should include the technical severity of the issue and its direct impact on the mathematical integrity of the market metrics.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Advanced data infrastructure and digital verification providers should have a direct request channel. If the engineering layer identifies a newly emerging systemic vulnerability or develops a more precise telemetry validation method, they require a mechanism to alert ICVCM to issue a Technical Notice. Factors should include the technical severity of the issue and its direct impact on the mathematical integrity of the market metrics.
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?	They may struggle with criteria governing "Continuous Monitoring." If a Technical Notice abruptly changes the frequency or baseline calculation of a continuously monitored variable, it can instantly disrupt active automated machine interfaces, causing immediate, artificial non-compliance for active operational projects.

Response 16

Name	Mr. Hugh Salway
Are you responding as...	On behalf of an organisation
Organisation	Gold Standard
My organisation is...	A carbon-crediting program
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?	The distinctions are somewhat clear, though there would be benefit to elaborating more clearly on the difference between all three. This could be done, for instance, through further examples (including providing an example of each instrument type for the same topic) and/or by elaborating on the definition of each instrument to include an explanation on how they differ from each other. We can in particular see the potential for some subjectivity in whether certain issues are treated as Interpretations or Clarifications. This matters practically as only the former are proposed to be subject to consultation. In cases where there is reasonable uncertainty as to whether an issue should be treated as an Interpretation/Technical Notice or Clarification – and in particular where one or more CCP-eligible Programme has questioned this – we would encourage the ICVCM to err on the side of consulting. We also consider the distinction between an "Interpretation" and substantive rulemaking to remain somewhat unclear. We encourage the ICVCM to also provide additional explanation as to the circumstances under which a formal revision of the Assessment Framework would be required instead of an Interpretation or Technical Notice.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	As above, ICVCM should establish and respect definitions for each that are as clear as possible, in order to reduce the element of 'choice' on the part of the ICVCM. The choice of instrument should depend on the materiality and normative effect of the issue being addressed. Clarifications should be limited to procedural or explanatory matters that do not alter interpretation or implementation expectations. Technical Notices should address technical implementation guidance, scientific updates, or operational consistency matters. Interpretations should only be used where ambiguity exists in existing requirements and should not introduce new obligations. Factors including market impact, methodological implications, implementation burden, and effect on existing approvals should also guide instrument selection. As above, we would also encourage ICVCM to err on the side of consulting in cases where a topic could be managed either through an Interpretation/Technical Notice or Clarification.
For what types of technical updates do you think this	The system is likely to work well for technical updates relating to monitoring approaches, data quality expectations, permanence management, remote sensing practices, disclosure requirements, and operational guidance. It may be less

system will work well, and where might it be less suitable?	suitable for issues involving significant policy shifts, changes to additionality approaches, fundamental eligibility criteria, safeguarding obligations, or substantive revisions to accounting principles. Such matters may require formal revision processes rather than interpretive instruments. We encourage the ICVCM not to use these instruments to essentially re-write existing provisions of the CCPs, but only for their actual intended purpose of interpreting, clarifying or addressing the technical application. We would recommend that safeguards are introduced to ensure that this risk is managed properly, through the approvals required by the relevant governance body involved in decisions on each instrument.
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?	Amongst other factors, considerations related to grace periods should consider: – The materiality, complexity, and implementation burden of the change – The length of time required by affected CCP-eligible programmes to introduce and consult on any required changes to standards/methodologies, as well as a reasonable length of time for standards to apply their own grace period for adoption of changes by existing activities, balanced by – The urgency of introducing any interpretation, technical notice or clarification in order to safeguard the reputation of the ICVCM, CCP-eligible programmes or CCP credits. Relevant considerations include impacts on existing methodologies, validation and verification procedures, registry systems, project documentation, contractual arrangements, and investment decisions. As above, longer transition periods may be required where methodology revisions, retraining, or system updates are necessary. Predictability is especially important for long-term project activities such as nature-based and technology-based removals, waste management, and community-scale infrastructure activities. Where a new interpretation, technical notice or clarification would affect activities that have already issued CCP-labelled credits or are within scope to issue CCP-labelled credits, we would encourage the ICVCM to always apply a grace period unless there is a strong justification for not doing so. We also encourage the ICVCM to consider some standardisation in the length of grace periods. Periods of 60 to 180 days may be considered, taking into account the factors highlighted above.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should	We agree that the rule architecture should avoid retroactive application and, as above, should use grace periods in order to enable a smooth transition for any activities affected by new interpretations, technical notices or clarifications. Existing CCP-approved activities should not be reassessed solely due to evolving interpretations unless there is evidence of material integrity failure. Safeguards should include prospective application, defined effective dates, transition arrangements, and materiality thresholds. ICVCM should also clearly distinguish between correcting errors and introducing new expectations.

ICVCM take into account in avoiding retroactivity?	Regulatory certainty is critical to maintaining investment confidence and long-term project viability. We would encourage ICVCM to take into account the following though: 1. Through communication and other means, how to avoid a scenario where credits receiving the CCP label prior to any new interpretation or technical notice are considered devalued by not reflecting the latest requirements. We appreciate that this is not entirely within the ICVCM's control but would encourage a proactive approach to ensure the perceived integrity of all CCP-labelled credits. 2. Providing flexibility for programmes to allow projects to comply retroactively with new clarifications or technical notices if they wish to do so, while not requiring this. This could, for instance, be needed in some cases to satisfy potential buyers. Applying an approach that considers the typical certification cycle. More specifically, appreciating that for a project going through a design certification / validation at the time of a new Interpretation, Technical Notice or Clarification, there may be challenges to adjust to comply with new requirements.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	As a general principle, it would be more helpful for eligible programmes if the ICVCM were to publish new interpretations, technical notices and clarifications on a predictable basis – and with advance notice and engagement – which programmes could then incorporate into requirements updates as needed. This would support operational planning, methodology governance, VVB training, and stakeholder communication while preserving ICVCM's ability to respond to emerging integrity concerns where necessary. However we appreciate that there may be some cases when it is important to publish at shorter notice, and indeed where this may be useful for eligible programmes and the wider market. In line with the policy for retroactive application, the ICVCM could consider permitting such shorter notice updates where this is justified and subject to appropriate governance and safeguards.

Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	We consider that it is useful for CCP-eligible programmes to have the ability to request this. Programmes possess practical implementation experience, and so will often be well positioned to identify areas of the CCPs or assessment framework that are unclear or open to different interpretation, for which an Interpretation, Technical Notice or Clarification would be justified. Allowing programs to submit requests would improve practicality, consistency, and transparency. The ICVCM could consider treating this in a similar way to Hearings, where a programme could have the ability to formally propose one of these three instruments and provide a rationale, with their evidence reviewed by members of ICVCM's governance structure. The ICVCM should then provide a formal response as to whether it agrees to the introduction of an Interpretation, Technical Notice or Clarification, or provide a rationale as to why this is considered not necessary. This should consider the materiality of the issue, relevance across programs and methodologies, integrity implications, implementation burden, evidence base, stakeholder impact, and whether existing rules are genuinely ambiguous or insufficient. Alongside this formal route, we believe that the ICVCM should be open to more informal proposals from eligible programmes or any other stakeholder.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	As above, we would recommend that the ICVCM establishes a formal route for CCP-eligible programmes to propose an Interpretation, Technical Notice or Clarification where this is deemed valuable or necessary. Alongside this, we believe that the ICVCM should be open to more informal proposals from eligible programmes or other stakeholders, including project developers, VVBs, scientific experts or other market participants We believe that this openness to views from other stakeholders is important for market trust in and engagement with ICVCM and the CCPs, and that there are lessons from market experience with CORSIA.

	We also encourage the ICVCM to review the ISEAL Code of Good Practice for Sustainability Systems, and specifically Section 3 and Section 6.13 related to stakeholder engagement, when considering how to proceed in this area. ICVCM should ensure requests are evidence-based, relevant to the Assessment Framework, and proportionate to the significance of the issue raised. Stakeholder requests should be evaluated transparently and consistently, with consideration given to technical expertise, affected parties, market implications, and integrity relevance. Mechanisms should avoid excessive procedural burden while ensuring broad stakeholder access and participation.
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?	As above, we encourage the ICVCM not to use these instruments to essentially re-write existing provisions of the CCPs, but only for their actual intended purpose of interpreting, clarifying or addressing the technical application. Interpretive instruments may be less suitable for principles-based or highly normative requirements where substantial policy judgment is involved. This may include requirements related to additionality, sustainable development, safeguards, stakeholder rights, permanence liability frameworks, and broader eligibility criteria. In such cases, substantive policy evolution may require formal revision processes, broader consultation, and Governing Board oversight rather than interpretive instruments alone. ADDITIONAL OVERARCHING COMMENT (NOT DIRECTLY LINKED TO THIS QUESTION) Gold Standard supports the objective of improving transparency, predictability, and consistency in the evolution of the CCP rule base. However, the proposed architecture should include stronger safeguards around non-retroactivity, procedural transparency, proportionality, and the distinction between interpretation and substantive rulemaking. It is also important that the framework respects the governance autonomy of CCP-Eligible Programs and avoids unnecessary duplication with existing program-level governance systems. The following points may be noted: – Clarify governance boundaries: ICVCM should clearly define the scope, accountability, and implementation procedures for Interpretations, Technical Notices, and Clarifications. – Protect predictability: ICVCM should establish predictable update cycles, transition periods, grandfathering, and non-retroactivity principles to avoid policy drift. – Respect program autonomy: ICVCM should confirm that CCP instruments do not override the governance frameworks of CCP-Eligible Programs such as Gold Standard.

	– Distinguish interpretation from rulemaking: ICVCM should set clear limits so Interpretations explain existing requirements rather than creating new obligations. – Consult before material changes: ICVCM should require public consultation, response-to-comments, and, where appropriate, peer review before issuing substantive guidance. – Define the status of Technical Notices: ICVCM should clarify whether Technical Notices are advisory, operational, or mandatory, and ensure consultation before they affect program or project obligations. – Keep Clarifications administrative: ICVCM should ensure Clarifications remain non-substantive and are not used to introduce new requirements. – Apply proportionality: ICVCM should focus updates on material integrity issues and avoid unnecessary administrative burdens on methodologies, validation, and verification. – Protect small-scale activities: ICVCM should introduce differentiated requirements or proportionality measures for microscale, small-scale, and community-based activities. – Avoid duplication: ICVCM should rely on and recognise equivalent governance processes within mature standards systems, rather than duplicating reviews. – Create recourse mechanisms: ICVCM should establish an independent reconsideration or appeal process for decisions with material consequences. – Balance integrity with market stability: ICVCM should ensure adaptive governance supports scientific responsiveness without undermining investor confidence or long-term project certainty.

Name	**Mr. Boris Lagadinov**
Are you responding as...	On behalf of an organisation
Organisation	Puro.earth

My organisation is...	A carbon-crediting program
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?	The distinction within a Tier (i.e. Interpretations vs Technical notes) is not very clear as they both affect future assessments and provide guidance on existing rules, so that could be expanded maybe with examples.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The implied impact on future assessments/existing ones, as currently phrased, should continue to be the main factor to decide (i.e. whether existing requirements are amended by the instrument) as well as the scope of application of a requirement.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The approach would work for incremental updates to rules, but if an instrument leads to fundamental changes in requirements, a framework revision would be a better approach.
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?	As with the choice of instrument, the impact should be the main factor to decide whether a grace period is needed as well. Grace periods of 12–24 months seem appropriate for material changes.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Safeguards could include a grace period and clear cut-off date tied to adoption. This could be strengthened by an explicit statement in each instrument confirming no retroactivity. Two specific categories which should be safeguarded are worth mentioning: first, CCP-Approved methodologies which should maintain their approved status. A CCP-Approved methodology version should be valid for its full crediting period or until the program voluntarily submits a new version. New instruments would only apply to new methodology versions submitted after the effective date. Further, only Interpretations and Technical Notices with material impact on a specific methodology type should trigger any reassurance obligation — clarifications should never do so, regardless of what they say.

	Second, methodologies currently mid-assessment should be assessed against the rules in force on the date their application was accepted, not rules that come into effect during the assessment process.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	A mixed approach seems most convenient with urgent safety and/or integrity issues published on a rolling basis, while routine updates are batched twice yearly.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	Requests should be formal and in writing, they should cite the specific criterion and explain the practical issue encountered. Before a decision whether to proceed, they should be assessed by the Expert Panel.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Accredited VVBs and NGOs should also be able to submit requests, given their direct implementation experience. The same structured submission process should apply, with ICVCM retaining full discretion on whether to act.

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?	Requirements that involve qualitative judgements about program governance culture or stakeholder rights (e.g. free, prior and informed consent) may be poorly served by Technical Notices, which risk oversimplifying nuanced social standards into checklist items.

Name	**Mr. Vaughan Andrews**
Are you responding as...	On behalf of an organisation
Organisation	Weyerhaeuser
My organisation is...	A carbon project developer
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?	The distinctions are directionally clear, but the line between Interpretations and Technical Notices would benefit from further explanation, as both appear capable of materially affecting how criteria and requirements are assessed. The framework would be improved by adding a decision test or examples showing when an issue is 1) interpretive, 2) technical or 3) operational. It would also be helpful to state explicitly that a Clarification cannot be made if the outcome could reasonably affect eligibility, approval status, quantification results, or substantive compliance burdens.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	Key factors should include: • whether implementation would require program, methodology, project, or market participant adjustments. Most important to us is that methodologies already operating under CCP labels be able to maintain that status without undue burden on developers; • whether the issue is time-sensitive due to integrity risk, and the risk-level of the topic at hand • whether the issue could materially affect assessment outcomes, eligibility, approval, or assurance findings; ICVCM should adopt a "lowest-impact instrument" principle and require escalation to Interpretation or Technical Notice only when there is a plausible material impact.

For what types of technical updates do you think this system will work well, and where might it be less suitable?	The system should work well for targeted technical issues where the underlying rule remains intact but operational detail needs to be specified, such as parameters, accepted data sources, or category-specific technical conventions. It may be less suitable where an update would effectively rewrite a criterion or introduce new substantive expectations that market participants could not reasonably have inferred from the existing text. In these cases, a separate formal amendment process may be more appropriate than using Interpretations or Technical Notices. ICVCM should avoid using the architecture to make changes that are "formally not amendments" but equivalent to amendments in practice.
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?	Grace periods should be guided by: • the degree of material impact; • the number of projects, programs, or methodologies that would need to update systems, documents, contracts, models, or monitoring procedures; • whether the update could affect issuance timing, buyer commitments, audit timelines, or commercial value; • whether the affected activities are long-cycle land-based projects where adaptation takes significant time. For material changes, ICVCM should use minimum default grace periods of at least 12-months unless urgency clearly justifies a shorter timeline. It may also be appropriate to grandfather certain decisions or provide staged implementation for projects already in development, already registered, or already CCP-labeled.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	ICVCM should: • narrowly define any exception to the non-retroactivity principle; • prohibit changes from affecting completed assessments, prior labels, or decisions already relied upon commercially, except in truly exceptional circumstances; • require written justification, governance approval, and public notice where any exception is proposed; • distinguish clearly in writing between future expectations and any effect on prior approval or label status.
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:	A mix of the above, depending on the urgency.

Please explain your choice, if needed	A mix would be preferable, depending on urgency. Predictable batched publication (for example, once or twice per year) would be easier for us to monitor and implement for any Interpretation or Technical Notice with potential material impact. Rolling publication is more suitable for Clarifications and genuinely urgent integrity issues. ICVCM should publish a forward-looking calendar or at least expected update windows, so market participants can plan internal reviews and stakeholder communications. Communicate newly published Notices and Clarifications through established channels such as the newsletter with a link to a library that is easily searchable. The library should include all Notices and Clarifications available for public viewing, with clear version control.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	ICVCM should consider: • whether the request is supported by evidence from implementation experience; • whether the request has implications beyond a single program or methodology family; • whether acting on the request would improve integrity, transparency, and reduce risk.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Other stakeholders should be able to request consideration, including project developers, methodology users, validation/verification bodies, buyers, civil society, academics, and technical experts. However, ICVCM should apply clear screening criteria so the process is not dominated by narrow commercial interests or one-off disputes. Relevant factors include: • technical credibility of the issue raised;

	• evidence that the issue affects consistency, integrity, or implementation across a large portion of the market (or future market); • materiality and urgency; • whether the issue is broad enough to merit system-level treatment rather than case-by-case handling.
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?	No

Name	**Mr. YUSAKU HARADA**
Are you responding as...	On behalf of an organisation
Organisation	Tokyo Gas Co., Ltd
My organisation is...	A buyer or intermediary
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?	
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	

For what types of technical updates do you think this system will work well, and where might it be less suitable?	
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?	
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	We strongly support the principle, expressly stated in this consultation document, that instruments apply only prospectively. This principle underpins the market predictability and resilience that ICVCM values, and we recommend that it be made as robust and narrow in exception as possible. We recommend the following specific safeguards. First, carbon credits that have already been issued, and credits from projects already validated and registered under the current framework, should retain their status and CCP label and should not be subject to re-assessment under instruments adopted later. Second, crediting periods that have already commenced should be protected, so that a project may continue under the rules in force at the time its crediting period began (rights in force / grandfathering). Third, any exception to prospective application should be expressly justified, subject to public consultation, and approved at Governing Board level, with the justification published. Fourth, assessments already under review should be completed under the rules in force at the time the application was accepted. Each of these safeguards serves to protect the basis on which market participants have developed projects, executed contracts, and arranged financing in reliance on the current rules. Predictability in the treatment of already-developed and already-financed projects is essential to continued investment in this market and to its sound growth.
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:	
Please explain your choice, if needed	
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	This is important for a level playing field. Project developers, credit market intermediaries (brokers and traders), buyers and corporate end-users, financiers, consultants, regulators, and government agencies and industry associations all hold practical technical, and policy expertise yet are not CCP-Eligible Programs. Limiting the request right to programs would exclude the entities that actually develop, finance, and trade credits. We recommend the request channel be open to all market participants, under transparent criteria for accepting or declining requests, defined response timelines, and a public log of requests and outcomes. ICVCM should weigh the breadth of market interest affected, the evidence of genuine uncertainty, and the value of resolving it for market function and liquidity. Requests could be screened for materiality and consolidated where several raise the same issue.
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?	

Name	**Ms. Kelley Hamrick Malvar**
Are you responding as...	On behalf of an organisation
Organisation	The Nature Conservancy
My organisation is...	Another type of organisation not listed above (non-governmental organization that works across carbon project development, environmental & human rights issues, and others)
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?	Once you read the explanations, the distinctions between instrument types are clear. However, we would suggest thinking of different names (Interpretations, Technical Notices and Clarifications) as it's difficult to understand (from the name) that "Interpretations" are principle-level explanations and "Clarifications" are operational-level explanations. Some of the specifics use-cases between the "Interpretations" and "Clarifications" are a bit unclear as well and would benefit from more details and specificity around each step of the procedure, participants, timeline, etc. For example (using a theoretical case): if an input arises on documentation requirements for FPIC, it's not clear how it would be determined if it falls under Interpretation (defining what FPIC means in practice) or Clarification (determining implementation or documentation questions). Because one is subject to public consultation and the other is not, this decision may impact who gets to weigh in on decisions about community rights. It would be useful to publish a decision-making guide with hypothetical examples.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	A key factor is whether the instrument can change what a project must do to demonstrate it meets the threshold. It may be most useful for the ICVCM to convene experts for some of these choices; e.g. if the factor is around a new scientific or technical approach, or if it touches on safeguards. For a new scientific tool, ICVCM may opt to convene experts to define the factors that influence each instrument (Interpretation, Technical Notice, Clarification). For safeguards, the IPLC engagement forum might need to be consulted, especially in cases where the requirements have been broadly written (e.g. consent, benefit sharing) which allows for tailored approaches but additional requirements around implementation could raise or lower this bar.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	This system would work best for technical updates where there is a clear "right answer". It might be less well suited for social safeguards provisions where context matters a lot and what works well in one case does not work in another. These questions require real dialogue with communities and rightsholders and perhaps input from IPLC engagement forum.

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?	We suggest a standardized grace period. Case-by-case determination of a grace period duration creates confusion and extra efforts. In one of the previous updates of the VCS Standard, Verra standardized the grace periods to 12 months to avoid confusions among different cases. A longer grace period may be allowed for instruments that require meaningful changes, especially around social safeguards like community engagement processes, benefit sharing agreements, or other changes likely to affect communities and landowners – perhaps a 2-year grace period.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	ICVCM should remove the second sentence of the second bullet point in Box 2: "[…] unless this is expressly stated, […]". Also, ICVCM consider how even forward-facing changes might inadvertently require retroactive affects, such as renegotiating community agreements. For example, consider a theoretical instance where half of participants have signed an agreement before an instrument is enforced that would require a change to the contract agreement. It may be necessary to renegotiate all agreements for fairness across participants (the communities who signed earlier are potentially disadvantaged, if they've agreed to terms that don't meet the new standard). In this instance, there could be a safeguard in place to protect the entire contracting process, even if only half were completed.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	If an update is urgent, it should be on a rolling basis. If it is not urgent, it should be published with others in a batch.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	Yes, these requests should follow whatever process ICVCM is setting up for the "External Stakeholder Input" section laid out in Diagram 3.

Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Yes, these requests should follow whatever process ICVCM is setting up for the "External Stakeholder Input" section laid out in Diagram 3. In particular, ICVCM should consider how to best engage IPs and LCs and local civil society organizations, who may be best positioned to identify improvements around social safeguards (e.g. protecting community rights, strengthening benefit sharing, and other social safeguards). It would be beneficial for these groups to have an accessible pathway to request instruments.
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?	As mentioned in our previous answer, careful consideration would be needed for updates to social safeguards (e.g. benefit sharing, FPIC, grievance mechanisms, etc). Often times these have an intentional level of flexibility because communities and contexts differ. It will be key to avoid circumstances in which these instruments accidentally narrow flexibility in ways that set the bar too low by weakening protections or too high by suggesting one-size-fits-all requirements that aren't practical across different contexts. Social questions may need to rely more heavily on public consult and community engagement. These updates may also need to go through the IPLC Engagement Forum.

Name	**Prof. HAITHAN ASKAR**
Are you responding as...	An individual
Organisation	
My organisation is...	
How clear do you find the distinctions between the different instrument types: Interpretations, Technical Notices, and Clarifications? What, if anything, would	While the key distinctions emphasised in the draft are: -Tier 2 instruments (Interpretations & Technical Notices) may change how requirements are assessed after an effective date (hence the need for consultation and transition measures). -Tier 3 (Clarifications) are meant to be lighter-touch and implementation-focused, without altering assessment outcomes. However, more clarification is needed for: 1- The boundary between Interpretations and Technical Notices. 2- The language and vocabulary used, which seemed slightly vague (May, might)

benefit from further explanation?	3- More details are needed between the creeps in the tiers. 4- Examples are needed; this has been discussed through the long months it took in the discussion of ISO TC/207
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	There are several issues to be highlighted here; however, I would highly recommend that we look into: 1- Draw a flowchart or a clear table identifying what we identify as the borderline between a technical issue and interpretation. 2- Examples. 3- How we properly quantify (Impact).
For what types of technical updates do you think this system will work well, and where might it be less suitable?	Role of AI and Tokenisation
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?	While there are several factors that might impact the grace period, it should be noted that the Potential impact on existing CCP-approved programs or methodologies mean (higher impact = stronger need). Implementation complexity — A question to ask is how difficult or costly it is for projects to adapt. Market stability and transition risks — Any future change could lead to sudden disruptions to credit issuance or supply. Nature of the change — technical adjustments usually need longer preparation than procedural ones. Finally, we should look into the length of grace period: Determined case-by-case, typically 3 to 12 months, depending on the above factors. Longer periods for high-impact or complex changes; shorter (or none) for low-impact Clarifications. The current draft leaves significant discretion to the Governing Board, which could benefit from clearer criteria or examples for predictability.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	To maintain this draft's goal of prospective application and keep the markets stability, ICVCM should keep in mind the following safeguards when developing instruments: – Default prospective application — The new rules apply only to future assessments, new projects, or new monitoring/crediting periods unless a strong justification exists for limited exceptions. – Mandatory, tailored transition measures: Grace periods must be given (typically 6–12 months, or longer for complex changes). – Grandfathering for existing approvals. – Phased implementation (e.g., only applying changes at crediting period renewal or baseline reassessment). – Have a prior impact assessment — so to evaluate potential effects on existing projects, costs, and market supply during development.

	– Must have a Stakeholder consultation — Specifically on transition implications from project developers, VVBs, buyers, and others. High governance threshold — Require clear justification, Governing Board/Expert Panel approval, and transparent public disclosure for any departure from non-retroactivity. E.g. Lessons from Systems like Verra's VCS Program Verra commonly uses grace periods (e.g., 6–12 months for methodology updates), crediting period renewals as natural transition points, and optional re-quantification pathways that allow (but do not force) retroactive updates for better integrity or CCP labelling.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	With an ever-evolving market, it is essential to keep abreast of all new consultations
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes

Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Stakeholders ICVCM Should Consider: Carbon Project Developers & Operators (especially those with existing CCP-approved projects) Validation/Verification Bodies (VVBs) Credit Buyers & End-Users (corporates, funds, governments) Carbon Market Infrastructure Providers (registries, exchanges, tokenisation platforms) Civil Society & Indigenous Peoples Organizations Standards Bodies & Rating Agencies Scientific & Technical Experts (via the Expert Panel and Science & Research Network)
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?	

Name	**Mr. Innocent. E. Azih**
Are you responding as...	On behalf of an organisation
Organisation	Africa Carbon Market Inc
My organisation is...	A buyer or intermediary
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?	The distinctions are clear as operational instruments.

What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	Interpretations – may have to include the peculiarity of the jurisdictions of credit transactions Technical Notices – ICVCM may consider the project scope in this consideration. Clarifications- ICVCM may consider how the project life cycle impacts the choice of instrument.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	– Carbon Dioxide removals – Nature-based solutions
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?	– The life cycle of a project already housing an approved credit – Technical notices indicating new introductions and /or transition dynamics
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Measures in support of measurement, validation, and reporting intermediaries in achieving timeous access to compliance information.
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:	A mix of the above, depending on the urgency.

Please explain your choice, if needed	It could depend on ICVCM publication periodicity.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	Consider the impact of specific instruments requests to the opertional efficiency or regulatory compliance of the eligible programs
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Market intermediaries, project developers, and civil society. ICVCM may subject such requests to regulatory or market procedural impact.
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?	It might be difficult to apply these instruments to credits projects that target non-ICVCM labels.

Name	Ms. Amy Kessler
Are you responding as...	On behalf of an organisation
Organisation	Climate Action Reserve
My organisation is...	A carbon-crediting program
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?	While the distinctions between the different instruments and their respective tiers are generally well articulated and supported by examples, there are two areas where further clarification would strengthen the framework. First, Interpretations and Technical Notices may have material implications for the market, as both instruments could alter how CCP Assessment Framework criteria are applied in practice. We find this to be inconsistent with the following language from the ICVCM that states, "The consultation does not propose changes to the Core Carbon Principles or the Assessment Framework and does not reopen existing CCP criteria or requirements." Second, we encourage the ICVCM to strengthen the distinction between Interpretations and Clarifications, given that these instrument types sit on different tiers and will likely have a substantially different impact on CCP-Eligible Programs. For instance, the example for an Interpretation on page 12 states "The requirement shall be understood, starting from [effective date], as requiring the following elements to be made public: [list of elements, including any additions]". In some cases, we could see this type of Interpretation being categorized as a Clarification since it is operational (i.e., an administrative change to publish existing documents) and does not change how the requirement is assessed. We recommend that the ICVCM reconsider how Interpretations and Technical Notices will be applied in practice, ensuring a transparent understanding that items are escalated to this tier only when strictly necessary. Further, if Interpretations are intended to affect the threshold for CCP Eligibility, we request that the ICVCM explicitly address how such changes to the Core Carbon Principles or the Assessment Framework will impact CCP-Eligible Programs. Lastly, we recommend that the ICVCM review and expand examples to further clarify the distinction between Interpretations and Clarifications, ensuring that Clarifications are consistently considered prior Interpretations in order to minimize changes to the CCP Assessment Framework criteria.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	While the ICVCM has outlined a process for moving from input to assessment outcomes, the current sequencing of decision points lacks sufficient clarity to understand how determinations will be made in practice. As an initial step, we believe the ICVCM should create and publish a decision matrix that outlines the requirements for how and when an item is escalated from a Clarification (Tier 3) to an Interpretation or Technical Notice (Tier 2). Next, the decision matrix should assess whether an input gives rise to a Technical instrument, as we believe this category is distinct in scope and function from both Interpretations and Clarifications.

	The Reserve reiterates that the ICVCM should first attempt to address any topic with a Clarification as this instrument does not intend to change how criteria requirements are assessed or to affect eligibility or assessment. Overall, a more structured escalation pathway would support a consistent distinction between the proposed instruments and provide CCP-Eligible Programs, and the market, with more clarity and predictability. The Reserve also recommends that the ICVCM establish a formal process through which CCP-Eligible Programs may raise concerns regarding the classification of any given item. We believe this can be achieved through the development of a clear process for submitting a response, whether during or outside of public consultation, accompanied by transparent expectations for how any resolution will be administered.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	Broadly, the Reserve believes the proposed CCP Rule Architecture will work well for minor operational matters or for addressing technical gaps at the methodology level. However, we have concerns that the system may not be appropriate for technical updates that alter or effectively raise the threshold for CCP Approval or CCP Eligibility. Technical updates, such as the example given for soil oxidation factors for landfill projects, can serve to ensure the most up-to-date climate science is incorporated into the CCP Assessment Framework. We believe this is an example, under the broader CCP Assessment Framework, where requirements can be strengthened without influencing the overall integrity threshold. However, we caution against these technical updates becoming stand-alone requirements and encourage the ICVCM to focus on its larger commitment to ensuring emerging developments in carbon market science are referenced during specific methodology evaluations. The Reserve discourages the ICVCM from using instruments to alter or raise the threshold for CCP Approval or CCP Eligibility. We are concerned that applying the proposed instruments in this manner will introduce additional confusion and administrative burden, rather than addressing the intended objective of clarifying ambiguous technical requirements.
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?	It is our position that a grace period should be provided to allow CCP carbon crediting programs sufficient time and resources to ensure continued compliance with the most recent requirements under the CCP Assessment Framework. It is our recommendation that the grace period timeframe be aligned with our CCP Eligible Program evaluation timelines to reduce administrative burden and provide predictability in the market. For instruments that may impact ongoing CCP Eligibility of a specific methodology, we ask that the ICVCM recognize changes impact entities outside of our program and provide adequate time for project developers and verification bodies to adjust accordingly across reporting and verification cycles. We recognize there may be simple computational errors that need to be addressed without materially affecting CCP Eligibility and may go into force with a condensed grace period.
The rule architecture is designed to avoid	We appreciate the need to strengthen integrity requirements as improvements are suggested or as climate science continues to evolve. However, the Reserve is concerned with the application of this system in a retroactive manner and asks the ICVCM

retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	to clarify what can be expected as it relates to the following statement, “unless this is expressly stated, separately justified, and subject to appropriate governance and safeguards.” The Reserve encourages the ICVCM to develop clear safeguards and processes to ensure instruments are only applied retroactively when absolutely necessary, such as cases involving fraud or material misrepresentation of previously evaluated information. We believe it is fundamental that the ICVCM maintain its position that updates to climate science, such as those seen with soil oxidation factors for landfill projects, only apply for future methodology evaluations and credits issued under future versions of the methodology. However, to strengthen integrity over time across CCP carbon crediting programs, the ICVCM could issue a Technical Notice for this type of change with an effective date and grace period to ensure updated climate science is consistently applied across the broader VCM. Further, we discourage the use of an issued instrument to result in CCP Approval or CCP Eligibility being revoked for previously approved methodologies and CCP-labelled credits as this would create uncertainty in the CCP label and diminish its value. An exception would be in the case of fraud or material misrepresentation of previously evaluated information, in which case we recommend the revocation only apply where a credit is held by a party to the fraud or material misrepresentation; if a credits is held by any other entity, the matter should be addressed in a manner other than revocation.
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 at predictable frequencies, in batches (e.g., twice per year).
Please explain your choice, if needed	We recommend that the ICVCM provide market certainty and predictability by only publishing changes in batches on a semi-annual, or preferably an annual basis. The Reserve recognizes that there may be cases of urgency where the ICVCM needs to issue a change immediately or soon after the batch timeline but asks that the ICVCM develop a clear and transparent process for when these urgent cases can be expected. Further, we would appreciate any indication regarding the anticipated volume of changes or instrument publications across these semi-annual or annual timeframes.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an	Yes

Interpretation, Technical Notice or Clarification?	
What factors should ICVCM take into account in deciding whether to do so?	The Reserve supports the ICVCM creating a pathway for CCP-Eligible Programs to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification. A few factors that we believe the ICVCM should consider when developing a formal request process include market relevance, implications for CCP-Eligible Programs, and other available resolution pathways. Further, the Reserve recommends that this process be as streamlined, equitable, and transparent as possible. Establishing a transparent and consolidated process for these requests will enable the ICVCM to proactively assess the overall relevance and impact on all CCP-Eligible Programs. Aligned with our previous comments, we encourage the ICVCM to work with all market participants, including CCP-Eligible Programs, to determine if proposed instruments can be resolved through direct discussions rather than formal instruments that would be applicable to the entire market.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	No
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	
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?	Reiterating our response to the question on the types of technical updates for which this system is most suitable, the Reserve believes the proposed system is best suited for minor operational adjustments or narrowly scoped technical updates that can operate alongside existing CCP criteria and requirements. We do not believe there are any specific CCP criteria or requirements for which these instruments will not work well but are rather concerned with overall impacts on the threshold for CCP Approval or CCP Eligibility. We therefore encourage the ICVCM to avoid applying these instruments in a manner that could dilute the integrity of current CCP credits in the market.

Name	**Ms. Marina Larin**
Are you responding as...	On behalf of an organisation
Organisation	Transparency International Secretariat
My organisation is...	An organisation working on environmental, social or human rights issues
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?	While the conceptual distinctions between Interpretations, Technical Notices, and Clarifications are generally understood, they lack the rigorous operational boundaries required for a high-integrity, quasi-regulatory body. Without strict definitional boundaries, the ICVCM risks facilitating "rulemaking by clarification," where substantive policy shifts bypass due process. To resolve this ambiguity, the following areas require explicit further explanation within the definitions: – Authority question: the framework must explicitly define who holds the mandate to issue each instrument. For instance, can the Secretariat issue a Clarification unilaterally? Does an Interpretation automatically mandate Governing Board approval and a public comment period? The definitions currently lack these procedural anchors; – Appeal and grievance mechanisms: it is unclear how stakeholders can respond if the ICVCM misclassifies an instrument. If the Secretariat issues a Clarification that civil society identifies as a substantive dilution of a social safeguard, the framework requires a defined mechanism to challenge this classification and force an elevation to an Interpretation; – Applicability and retroactivity: the framework requires an explicit explanation of how these instruments affect existing CCP-labeled credits. If an Interpretation refines the accounting baseline or a human rights safeguard, the rules must clarify whether this triggers a mandatory reassessment of already-approved methodologies or if it only applies prospectively.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The selection among these three instruments must not be driven by administrative convenience or a desire for regulatory speed. Instead, the ICVCM should adopt a strict matrix based on materiality, policy novelty, and socio-economic risk. The following factors must dictate the choice of instrument: – Materiality of impact on assessment outcomes: the primary threshold is whether the guidance alters the stringency of the Assessment Framework. If a ruling could conceivably shift a methodology's or program's status from "fail" to "pass", it constitutes a substantive rule change. This automatically necessitates an Interpretation. Clarifications must be strictly fenced off for non-substantive issues, such as typographical corrections or resolving circular cross-references; – Socio-economic and integrity risk profile: the choice of instrument must reflect the subject matter's real-world impact. Highly technical accounting adjustments may be suited for a Technical Notice. However, guidance concerning FPIC, benefit-sharing mechanisms, or transparency of Ultimate Beneficial Ownership (UBO) carries systemic integrity risks. Because these directly impact vulnerable communities and land tenure, any guidance on these topics must default to an Interpretation to guarantee broad civil society scrutiny; – Introduction of novel compliance burdens: the ICVCM must assess if the instrument introduces a constraint not explicitly debated during the original CCP drafting. If the ICVCM seeks to define a specific quantitative threshold (e.g., stipulating the

	exact percentage of revenue that qualifies as an "equitable" benefit share), this is a novel policy decision, not a clarification of existing text. Such novelty requires the comprehensive governance procedure of an Interpretation.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The proposed system of using Technical Notices and Clarifications will work well for purely empirical, quantitative, or administrative maintenance where the underlying policy intent is already settled. However, the system is unsuitable when applied to updates involving socio-economic safeguards, human rights, or financial integrity. This architecture is effective for quantitative or administrative updates where policy intent is already settled and the risk of corruption or exploitation is negligible: – Scientific adjustments: aligning Global Warming Potential (GWP) values with updated IPCC assessment reports; – Technological standards: updating remote-sensing data protocols or satellite imagery resolution requirements for monitoring forest cover; – Administrative hygiene: fixing typographical errors, updating VVB reporting templates, or harmonizing terminology with UNFCCC glossaries via Clarifications. However, the system poses a governance risk when it uses technocratic instruments to bypass public scrutiny on topics that directly impact communities and financial integrity: – Financial integrity and UBO: Defining or modifying Ultimate Beneficial Ownership disclosure rules and anti-money laundering protocols. These are anti-corruption safeguards, not accounting technicalities; – Socio-economic safeguards: adjusting the evidentiary requirements for FPIC or benefit-sharing allocations; – Sovereign jurisdictional risks: setting rules for Article 6 interoperability and corresponding adjustments. These involve state capacity, which cannot be delegated to an internal Expert Panel.
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?	The ICVCM should evaluate the necessity and duration of a grace period based on four factors: – Risk of regulatory "fire sales": if an Interpretation tightens an accounting baseline or closes an integrity loophole, the grace period must be zero or minimal. Giving the market a multi-month window incentivizes developers to rush validations under weaker rules, flooding the market with low-integrity credits before the deadline; – The nature of the safeguard: the length of the transition must reflect the severity of the real-world harm: 1) social & financial integrity safeguards: updates fixing human rights gaps, FPIC verification, or UBO disclosure rules require immediate entry into force; 2) administrative & procedural mechanics: updates to digital reporting templates or IT registry interfaces are appropriate for a standard 3- to 6-month grace period. – Sovereign legislative timelines: as the ICVCM expands to assess state-run and government programs, updates affecting Article 6 interoperability or national registries must account for domestic regulatory capacity. Aligning national laws requires significant bureaucratic lead time (e.g., 12 months). This extension must be strictly ring-fenced for sovereign entities to prevent private actors from exploiting it.

	– Retroactivity and label preservation: if an update identifies that an approved methodology carries systemic integrity or fraud risks, the grace period for suspending the CCP label on existing credits must be immediate to protect buyers and avoid market-wide greenwashing.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	To balance regulatory certainty with anti-corruption and environmental safeguards, the ICVCM should incorporate the following factors: – Delineating policy evolution from fundamental correction: the architecture must distinguish between an evolving standard and the discovery of a structural flaw. If the ICVCM updates a rule to reflect new, higher-ambition market norms (e.g., requiring more granular satellite data), avoiding retroactivity is appropriate. However, if an update closes a loophole that previously enabled systemic fraud, corruption, or FPIC violations, the ICVCM must retain the explicit right to suspend or revoke the CCP label retroactively; – Preventing "lemons markets" via vintage segregation: if older credits retain the CCP label despite failing new integrity rules, the ICVCM risks creating a market where low-quality, grandfathered credits trade under the exact same CCP banner as new, high-quality credits. A necessary safeguard is implementing strict vintage-tagging or requiring a public "flag" on older credits that clarifies they were assessed under superseded rules; – Crediting period renewals as hard stops: a core safeguard against permanent grandfathering is ensuring that "avoiding retroactivity" only applies to the current crediting period. The rules must explicitly state that upon renewal, every project must instantly comply with the newest iteration of all Interpretations and Technical Notices, with no exceptions or extended grace periods; – The "Do No Harm" threshold for revocation: avoiding retroactivity should strictly apply to carbon accounting baselines, not to socio-economic safeguards. If evidence emerges that a CCP-labeled project violates human rights, engages in forced evictions, or suffers from elite capture of benefit-sharing funds, the label must be revoked immediately, regardless of when the credits were issued.
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 at predictable frequencies, in batches (e.g., twice per year).
Please explain your choice, if needed	Predictable, bi-annual batches create a structured timeline that allows public interest groups to coordinate resources and analyze the cumulative, intersecting impacts of rule changes.

Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	In deciding whether to act on a request from a CCP-Eligible Program, the ICVCM must evaluate the proposal through a strict anti-corruption and market-integrity lens to prevent it from becoming a backdoor tool for regulatory capture. The primary factor is determining the motive and materiality of the request: the ICVCM must assess whether the proposed instrument clarifies a genuine technical ambiguity or if the program is attempting to dilute an Assessment Framework requirement to lower its own compliance costs. If the request alters the stringency of an eligibility threshold or touches upon sensitive socio-economic safeguards, such as FPIC or financial benefit-sharing, the ICVCM must refuse to handle it via low-level administrative notices and instead mandate a formal, publicly consulted Interpretation. Furthermore, the ICVCM should prioritize systemic relevance over bespoke loopholes, ensuring the request addresses market-wide friction rather than carving out proprietary exceptions for a single registry's portfolio. Finally, any decision to proceed must depend on the transparency of the evidence base, meaning the program's request and supporting data must be placed on a public docket for immediate civil society scrutiny before any rule change is considered.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	The ICVCM must formally accept requests from: – Indigenous Peoples and Local Communities and their representative organizations; – Civil Society Organizations, including human rights defenders and anti-corruption watchdogs; – Host-Country Governments, specifically Designated National Authorities managing Article 6 integration; – Academic and Independent Research Institutions providing empirical market oversight. When deciding whether to act on requests from these stakeholders, the ICVCM must evaluate them differently than requests from carbon-crediting programs, using the following factors: – Proximity to harm: the ICVCM must prioritize requests based on the stakeholder's proximity to project-level impacts. If an IPLC representative or local watchdog requests an Interpretation because a CCP-approved methodology is resulting in land

	disputes or bypassing FPIC, this must bypass administrative backlogs and be fast-tracked for Governing Board review; – Public interest presumption: the ICVCM should apply a presumption of validity to these requests. Unlike standard-setters or project developers, civil society and local communities do not possess a commercial motive to lower the compliance bar. Their requests typically function as critical early-warning systems for systemic governance failures; – Evidentiary ground-truthing: the ICVCM must weigh the empirical evidence provided by these stakeholders against the procedural claims of the registries. If an NGO provides ground-level evidence of elite capture in benefit-sharing, the ICVCM must use this factor to initiate an Interpretation, rather than relying solely on the registry's self-reported compliance; – Resource and capacity asymmetry: submitting a request for a formal regulatory Interpretation requires highly specialized carbon accounting and legal expertise. The ICVCM must factor in this asymmetry. A request from a local stakeholder must not be dismissed simply because it lacks the polished formatting of a submission from a major registry. The ICVCM must take institutional responsibility for translating valid, ground-level grievances into formal regulatory reviews.
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?	Attempting to govern Sustainable Development and Social Safeguards (CCP 9) via Technical Notices inherently risks reducing highly contextual, localized processes like FPIC into check-box compliance exercises. Similarly, ensuring Effective Governance (CCP 1) requires unmasking UBO to prevent elite capture. Using low-level administrative interpretations to mandate financial transparency will inevitably crash into the sovereign corporate secrecy and anti-money laundering laws of host countries, as these instruments lack the legal weight to pierce corporate veils. Furthermore, these tools fail when addressing the macroeconomic vulnerabilities within Robust Independent Validation and Verification (CCP 4). No technical clarification can neutralize the structural conflict of interest inherent in the "developer-pays" auditing model; achieving true independence requires fundamental market reform, not administrative guidance. Finally, enforcing No Double Counting (CCP 8) via these instruments ignores the reality of Article 6 integration. Once double claiming involves national authorizations, it transitions from private carbon accounting into sovereign treaty law. Dictating how a host country must manage its national ledger or issue corresponding adjustments via an internal ICVCM Technical Notice is untenable.

Name	Mr. Franco Sebastián D'Aprile
Are you responding as...	On behalf of an organisation
Organisation	IETA
My organisation is...	Another type of organisation not listed above (International Business Association)
How clear do you find the distinctions between the	Position: The three-tier structure is clear in principle, though two aspects require firmer definition before the system is relied upon in assessment and assurance, because each bears on whether an instrument can move the effective threshold without

different instrument types: Interpretations, Technical Notices, and Clarifications? What, if anything, would benefit from further explanation?	passing through formal revision. Reasoning: • Interpretations and Technical Notices carry the same consequences for the market: – each may change how criteria are assessed; – each may shift the threshold for CCP-Approval or CCP-Eligibility; – the features separating them are the subject matter addressed and the governance body that adopts them, rather than the effect produced. • The Clarification tier raises a related concern: – it is defined by reference to the effect it is intended to avoid; – the system relies on the Integrity Council to keep Clarifications within scope; – the illustrative Clarification on cessation of monitoring would in practice create a compensation liability, which shows how readily a Clarification can carry material effect. • Interpretations should not be treated as a safe middle category: an Interpretation that strengthens how a provision is implemented can move the effective threshold as much as a formal amendment, and the working group regards this as the central risk in the design. • It is not clear how the instruments reconcile with the directional signals the Integrity Council has already given the market, and programmes should not be left with conflicting indications. • The instruments have no stated lifecycle: there is no proposal for how an instrument is revised or retired, what weight it carries before its effective date, or what becomes of a programme assessed against a version later superseded. Recommendations: • Publish a concise decision test, supported by worked examples, explaining how an issue is assigned to each instrument. • Establish a transparent route for stakeholders to question the classification of the instrument used, supported by: – a defined process for raising the concern; – a defined process for resolving it. • Incorporate adopted instruments into the Assessment Framework rather than maintaining a separate and growing body of rules, and publish how instruments are revised, retired, and version-tracked, so the basis on which each programme was assessed remains documented over time.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	Position: A clear, published definition of each instrument should govern which instrument is chosen, so that placement follows a stated test rather than case-by-case judgement, and the test should turn on the effect an instrument produces rather than its subject matter. Reasoning: • The basis for assigning an issue to a given instrument, and the route by which a stakeholder may question that assignment, are addressed in our response to Question 1. We do not repeat that analysis here.

	Recommendation: We refer the Integrity Council to the two recommendations made under Question 1, namely the publication of a concise decision test supported by worked examples, and the establishment of a transparent route for stakeholders to question the classification of an instrument. Together these provide the clear definition that should govern the choice of instrument.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	Position: The system work for operational matters and settled quantitative parameters. It is not suitable where an instrument would raise the integrity threshold for programmes or methodologies already approved; a change of that kind is an amendment and belongs in the formal revision process. Reasoning: • Operational questions and parameters with an established scientific basis lend themselves to clear instruments that can be applied with confidence. • The system should also make clear how it operates at programme level and at methodology level, since the implementation burden and the timing of assessment differ between the two. • A different situation arises where an instrument strengthens a provision in a way that lifts the effective standard: – the consultation permits Interpretations to strengthen how a provision is implemented and to affect the threshold; – where that occurs, the change is in substance an amendment; – the feedback we receive from crediting programmes is that changes of this kind are experienced as a shifting threshold against which they were already assessed. Recommendations: • Suitable for instruments: – operational and documentation matters; – matters where a common understanding already exists, which an Interpretation can confirm; – quantitative parameters supported by consensus, where the parameter draws on an established external reference rather than a value the Integrity Council would itself set; – sector-specific matters where a Technical Notice can add value, such as a declared definition of leakage by sector, or differentiated permanence rules that prevent programmes from being locked into a single approach, provided the instrument adapts the system without excluding programmes arbitrarily. • Less suitable, and better routed through formal revision: – any instrument that would raise the effective threshold rather than resolve an ambiguity, which should proceed through the Assessment Framework revision process reserved to the Governing Board. – any instrument that would fix a value properly resting with an established external reference; where such a reference exists, the instrument should adopt it rather than substitute a figure of the Integrity Council's own. • We ask the Integrity Council to reconsider whether a parallel instrument track is needed for threshold-affecting matters

	at all. The Framework already provides a route to revise the threshold, and the working group's view is that material change is better made through that route, with the instruments reserved for technical application.
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?	Position: Should the system proceed, a grace period should be provided wherever an instrument requires programmes, methodologies, or the actors downstream of them to change practice, and its length should be tied to the affected programme's next verification cycle. Reasoning: • The burden of an instrument falls beyond the programme itself: – project developers and validation and verification bodies operate under the programme; – these parties work to fixed verification and reporting cycles. • The form of the grace period affects how workable it is: – a flat calendar period can fall awkwardly across those cycles; – a period aligned to the next scheduled cycle gives all parties a realistic opportunity to comply. Recommendations: We suggest the following factors determine whether a grace period is needed: • whether programmes or methodologies must alter systems, documentation, or monitoring to comply; • whether downstream actors require lead time; • whether the change affects credits already in the issuance pipeline or projects already financed; • whether compliance requires a full monitoring, verification, or recertification cycle. On length, we suggest the Integrity Council: • tie duration to the next verification or annual reporting cycle; • set a stated minimum for any instrument touching methodology application, for which twelve months is a reasonable floor; • address activities already part-way through a crediting period expressly; • consult on the grace period as part of the consultation on each material instrument, which the proposal already contemplates.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Position: We welcome the commitment to prospective application. Our concern is the exception the consultation allows, where an instrument may apply to ongoing assessment or assurance if expressly stated and separately justified (referred to as the "carve-out" going forward), and our recommendations are directed at confining that carve-out and, where it is justifiably triggered, managing its effect on programmes to protect market stability. Reasoning: • Because the carve-out is available at the Integrity Council's discretion, its existence is itself destabilising: a programme cannot know whether a future instrument will be applied to it retroactively, and that standing uncertainty deters purchases and complicates long-term offtake regardless of how sparingly the carve-out is used. • The principal area of difficulty is the annual assurance of a programme that is already eligible:

	– applying a new instrument at the next assurance cycle is prospective in form; – to a programme assessed under the previous reading, it operates as a change to the terms on which approval was granted. • Issued credits and committed projects raise the same concern: – credits already issued were issued against the standard as it stood; – projects that reached a final investment decision or registration under the prior reading committed capital in reliance on it. • The effect reaches the credit itself once status is recorded: where a credit's label is fixed on a registry or on-chain, a later change to a programme's status cannot be applied cleanly to credits already issued and sold, leaving the programme exposed on offtake agreements it has already concluded. Long-term offtakes are most affected. Recommendations: • Confine the carve-out to cases of demonstrated integrity failure or safeguarding and fraud risk. • Place issued credits and committed projects expressly outside the reach of new instruments. • CCP-Eligible and CCP-Approved status, once granted, should be treated as settled. It should not be withdrawn, reopened, or made conditional on a fresh or limited assessment by a newly-introduced instrument alone, as a recurring reassessment obligation would be constant, resource-intensive, and itself a source of market uncertainty. • Publish how each CCP is assessed, so the rules guiding assessors are transparent and applied consistently, and so the market can see the basis on which a programme's status rests.
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:	A mix of the above, depending on the urgency.
Please explain your choice, if needed	Position: Should the system proceed, we select the mixed option, under which most instruments are published on a predictable schedule and an expedited route remains available for urgent matters. Reasoning: • A predictable schedule serves the market resilience the system is intended to support: – it allows members to track changes; – it allows members to plan compliance and allocate resources with confidence. • A standing expedited route remains necessary for the rare instrument addressing an urgent integrity or safety concern.

	However, we recommend not having this option at all as its existance could be destabalising. • The Integrity Council has become more efficient than in its earlier years; a continually expanding instrument process risks that progress, which weighs in favour of a predictable and bounded cadence. Recommendations: • Adopt predictable, scheduled publication, for example yearly, as the default. • Retain expedited publication as a documented exception reserved for urgent matters. • Consider the cumulative volume of instruments and whether an annual limit is appropriate, so that programmes and the actors beneath them can keep pace. *** We add one caution. Several criteria already carry signposted areas for the next iteration of the Assessment Framework. Using an instrument to address a topic already earmarked for that process would blur the line the system is intended to draw, and we encourage the Integrity Council to reserve those topics for formal revision.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	Question 7) On CCP-Eligible Programmes submiiting requests — Position: Should the system proceed, we support allowing CCP-Eligible Programmes to request that the Integrity Council consider an instrument. Reasoning: • Programmes are positioned to identify the need for an instrument early: – they carry the implementation burden; – they encounter points of ambiguity before other parties do. • A formal request channel improves consistency: – it allows a programme to seek a transparent and binding reading; – it reduces the prospect of differing interpretations accumulating through the assurance process. Recommendations: We suggest the Integrity Council take the following factors into account when deciding whether to act on a request: • the materiality of the issue, and whether it is common to several programmes or specific to one; • whether the matter is better resolved through bilateral assurance dialogue than through a published instrument; • transparency, achieved by logging requests and their outcomes so that the process is even-handed;

	• equal access, achieved through a published and criteria-based intake process. Question 8) On other stakeholders submitting requests — Position: We do not support extending a formal request channel to stakeholders other than CCP-Eligible Programmes. Reasoning: • The Integrity Council already operates a general grievance address, through which a project developer or any other party with a genuine concern can raise it. • The Integrity Council also publishes its instruments and supporting material for public consultation, so stakeholders already have routes to be heard and to have material points considered. • A formal request channel open to all parties would risk a high volume of requests, including frivolous ones, and would allow a project developer to bypass the programme under which it operates. • It would also place a monitoring burden on CCP-Eligible Programmes, which would have to track and respond to third-party requests on top of their existing obligations. Crediting programmes carry the implementation responsibility and are the parties in direct contact with the Integrity Council. Recommendation: Retain the existing grievance address and the public consultation process as the routes available to other stakeholders. Where issues are raised through those routes, give notice to the programmes concerned so they can respond. Do not establish a formal instrument-request channel beyond CCP-Eligible Programmes, whose standing is addressed in our response to Question 7.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	No
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	
Are there any specific CCP criteria or requirements for which Interpretations, Technical Notices or Clarifications might not	Position: Instruments will be less effective where the underlying criterion is open-textured or built on programme discretion and equivalence, because an instrument that narrows such a criterion operates as an amendment to it. Reasoning: • Several criteria are framed in qualitative terms or expressly permit a programme to demonstrate that an alternative approach meets the same threshold:

work well, due to the nature of the existing rule?	– an Interpretation that narrows these provisions changes the effective standard rather than clarifies it; – such a change sits uneasily within a system designed to apply the Framework rather than amend it. • Other criteria are expressed as defined values and are well suited to a Technical Notice. The suitability of an instrument should be judged by the extent to which it affects the operations of crediting programmes and project developers, rather than by the drafting of the criterion alone. In assessing a given criterion, the relevant considerations include: • whether the instrument carries commercial impacts; • whether it is forward-looking in effect; • whether it affects the price of existing CCP-approved credits in the market; • whether it could require a programme to undergo reassessment, including before the programme has reached a decision on renewals; • the time between the introduction of an instrument and the next version of the Assessment Framework, since an instrument introduced shortly before a scheduled revision may cause disruption that outweighs the benefit of acting through an instrument rather than through the revision. Recommendation: Instruments are well suited to criteria expressed as settled, defined parameters, where the change can be applied with confidence and limited operational disruption. Instruments are less suited to criteria that rest on qualitative judgement or on programme discretion and equivalence, where a narrowing instrument would operate as an amendment to the standard, and such criteria are better addressed through the formal revision process. We recommend that the identification of which criteria fall on each side of this line be informed by crediting programmes, which are best placed to judge the operational and commercial impact in each case.

Name	**Mr. Karan Kumar**
Are you responding as...	On behalf of an organisation
Organisation	Value Network Ventures Advisory Services Pvt. Ltd.
My organisation is...	A carbon project developer
How clear do you find the distinctions between the different instrument types: Interpretations, Technical	The distinctions are mostly clear. However, the boundary between a Clarification and an Interpretation would benefit from further refinement, as both can influence how rules are applied in practice and may have material implications. ICVCM should provide a simple decision-making checklist to guide the choice of instrument type. Additionally, explicit clarification is needed on whether and how previously issued credits could be affected by new instruments.

Notices, and Clarifications? What, if anything, would benefit from further explanation?	
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The primary consideration should be whether the change affects the pass/fail outcome of an assessment. If so, it should be classified as an Interpretation or Technical Notice rather than a Clarification. Additional factors include whether the change modifies the meaning of a rule or clarifies its application, the scale of impact across programs and projects, and the urgency of the issue versus suitability for standard consultation.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The system is well suited for updates to emission factors, default values, and technical parameters; alignment with international standards such as CORSIA or Article 6; and clarifications related to MRV and documentation processes. It is less suitable for fundamental changes to project category eligibility and for updates introduced mid-cycle, particularly for small-scale or smallholder projects that may lack the capacity to adapt quickly.
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?	Grace periods should account for the complexity of the change, the number of affected stakeholders, and whether projects have already issued credits or entered long-term contractual arrangements. However, even clearly defined grace periods can disadvantage existing projects, as markets do not provide equivalent transition buffers. ICVCM should ensure equitable treatment of projects that have already undergone lengthy cycles, recognizing that a uniform grace period may not be sufficient. Stakeholder input should be solicited, and the rationale for the chosen period clearly explained.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	ICVCM should clearly state that new instruments do not alter the outcomes of completed assessments and should provide a formal mechanism for stakeholders to raise concerns regarding potential retroactive application. The treatment of previously issued credits should be explicitly clarified.
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	A mix of the above, depending on the urgency.

keep up to date if the changes were:	
Please explain your choice, if needed	A hybrid model is recommended: Clarifications should be published on a rolling basis with stakeholder notifications, while Interpretations and Technical Notices should be released in predictable batches aligned with project cycles. An annual forward-looking pipeline of expected updates would further enhance preparedness.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	CCP-Eligible Programs should be able to formally request the introduction of Interpretations, Technical Notices, or Clarifications. ICVCM should consider the materiality, urgency, and relevance of the issue, as well as the extent of impact across programs and market participants when evaluating such requests.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Other stakeholders including project developers, credit buyers, researchers, and industry experts should also be able to request instruments. ICVCM should consider materiality, urgency, and breadth of impact when evaluating requests, while ensuring strong equity considerations, particularly prioritizing smallholder projects, vulnerable communities, and Indigenous stakeholders.
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?	The framework may be less effective in cases involving previously issued credits unless explicitly clarified. It may also present challenges for small-scale or resource-constrained projects when changes occur mid-cycle.

Name	Ms. Sinclair Vincent
Are you responding as...	On behalf of an organisation
Organisation	Verra
My organisation is...	A carbon-crediting program
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?	The consultation document states that Interpretations, Technical Notices, and Clarifications are a system for how existing ICVCM Assessment Framework criteria and requirements will be interpreted, applied, assessed, and updated over time. However, it also states that "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…Any process to amend [the CCPs and the Assessment Framework] is outside this system." It is unclear how the proposed instruments (the stated purpose of which is to form a system for how the AF will be updated over time) are different from "formal amendments, revisions, or additions to the CCPs or AF, " given that an Interpretation or Technical Notice can change the way the CCP or AF is implemented and affect the threshold for CCP approval. For example, under the VCS Program, any changes with a material impact on the program rules, their interpretation, or implementation are considered program updates. This is so we can transparently communicate to stakeholders how the update affects existing projects, whether and how they are expected to transition, and the effective date for conformance. We recommend having a strong distinction between Interpretations, Technical Notices, and Clarifications and formal updates, including a set of criteria for determining whether an instrument will have meaningful impacts on the interpretation and assessment of the rules, and thus should constitute a formal update, with grace periods and guidance for their implementation. The ICVCM should consider making the CCP rule base more comprehensive by adding a Tier 4 for formal updates. Alternatively, the ICVCM could clarify that the Interpretations and Technical Notices are intended to be seen as interim updates to the CCPs and AF and must be interpreted as such, and that they will be formally integrated into the next issued version of the CCPs and AF when published. Based on the example provided, it appears that Clarifications could go beyond operational matters. The example introduces an additional requirement that cessation of monitoring and verification requires compensation equivalent to all buffer credits contributed by the project to date. A change of this nature could meaningfully alter a program's rules for the treatment of avoidable reversals, which more closely resembles an Interpretation than a Clarification. In general, the difference between Interpretations and Clarifications needs to be clearer.

	Where Interpretations and Technical Notices are "strengthening" the CCPs or Assessment Framework, they may be seen as updates to the Assessment Framework and/or as different interpretations than in the past. We encourage ICVCM to consider whether the framing of such instruments needs to be modified to indicate that they do lead to updates/changes to the Assessment Framework. Where this is the case, careful consideration must be made about how such updates must be implemented by approved GHG programs. The distinction between Interpretations and Technical Notices is also worth clarifying. Both instruments address existing requirements and can affect how criteria are assessed and CCP approval or CCP eligibility thresholds. The primary differences appear to be procedural (who issues them) and the subject matter (meaning and intent vs. technical application). However, in practice, these can overlap. A decision about which data sources or parameters apply to a provision can implicitly shape its scope and intent. It is worth considering whether the two instruments are sufficiently distinct to warrant separate categories, or whether they could be combined into a single instrument with a single governance and consultation process.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The main factor that should be considered is whether or not the instrument is ultimately a change in the Assessment Framework or CCPs (e.g., additional detail added to a requirement; changes in how the requirement is interpreted that could lead to different assessment outcomes). For instruments that impact future assessments, the grace period and how previously approved programs and methodologies will be seen by the market must be carefully considered.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	A system like the one proposed will be most useful for clearly communicating how the Assessment Framework and CCPs are to be applied in program- and methodology-level assessments and providing a level playing field to all GHG programs. Technical updates can be made most useful as a signal for where ICVCM is heading in future assessments of methodologies against the CCPs (e.g., where ICVCM changes its stance on oxidation factors within a category that will result in different assessment outcomes compared to the past). This system, as proposed, is less suitable for instruments that would raise the effective threshold of a requirement rather than resolve ambiguity. Such changes should proceed through the Assessment Framework revision process, whether it be added to this architecture or remain completely separate. Another area where the current system is less suitable is in recognizing innovation that sits outside the existing AF criteria. The proposed instruments are designed to apply and clarify existing requirements, but provide no mechanism to acknowledge approaches that are equivalent to but not yet recognized by the AF.

	Verra's ongoing Durability Pilot is an example of this. The pilot tests insurance and fund-based alternatives to the pooled buffer account as mechanisms for managing non-permanence risk. These approaches are intended to be equivalent in intent to the pooled buffer but are not currently recognized under the AF, meaning participating projects cannot carry CCP labels. Overall, we recommend ICVCM consider developing a mechanism to recognize innovations of this kind, as a complement to the instrument system. See our response to question 5 regarding the retroactive application of such instruments.
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?	Methodology revisions typically require 6–12 months, and projects may need an additional 12 months to transition to updated methodology versions. Therefore, a default grace period of around two years may be reasonable to avoid gaps in CCP eligibility and allow for smooth transitions. However, grace periods should also consider the underlying issues, how they affect integrity, and urgency to transition to updated requirements. Note that the timelines above do not include ICVCM reassessment, which could add significant time if conducted sequentially after the revisions are completed. Early engagement and ongoing feedback from ICVCM during the revision process would therefore be important to avoid further delays. For any instruments that would affect the way a program sets its program rules (e.g., standards, procedures, or guidance documents), grace periods are essential. Even minor clarifications or interpretations may have long-reaching impacts, requiring updates not only to program documents, but also to templates, digital processes, internal checklists, and registry infrastructure. Development and implementation of such updates typically lasts 12-18 months, depending on the scale of the update. Updates then need to be announced with their own grace period to project proponents and VVBs, with corresponding training materials developed. Because of the potential impact of these instruments, programs need to have a clear grace period and effective date, and they need to clearly understand the process and milestones for demonstrating conformance. At Verra, we clarify that an update must be applied by a project the next time that a specific project request type is submitted after the effective date. An equivalent wording by ICVCM might state that an instrument must be adopted by an already CCP-approved program by their next annual report submitted after the effective date, with a clear understanding of when such annual reports are due.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should	It is important to be clear about the meaning of "retroactive," as the term covers two very different scenarios. While we do support the objective of avoiding retroactive application of instruments to already issued and labelled credits, we consider it necessary to apply instruments on a go-forward basis, with an appropriate grace period, to methodologies that have already been approved, and future issuances under those methodologies.

ICVCM take into account in avoiding retroactivity?	The first scenario is the retroactive reassessment of credits that have already been issued and labeled. Verra strongly agrees that this should be avoided. CCP-labelled units that were in conformance with the rules and requirements of ICVCM and the respective program at the time of requesting verification approval should retain their label, and their value and validity should not be affected by the subsequent publication of an instrument. Changing the status of already issued credits retroactively would undermine market confidence in the CCP label itself and create uncertainty. The second scenario is the continued recognition and future issuance of credits under methodologies and programs approved before an instrument was published. This is distinct from reassessing already issued and labelled credits. Applying instruments in this context is not retroactive in a harmful sense. Rather, it is the ordinary consequence of the framework keeping pace with evolving science, technical developments, and best practice. We caution against treating "avoiding retroactivity" as a basis for grandfathering existing methodologies while applying updated criteria for new assessments in the same category. As reflected in the Assessment Framework under "Emissions Impact" and Criterion 10.1, methodologies are expected to apply robust and conservative quantification based on sound science and the latest available evidence. Where an instrument reflects updated science — for example, revised landfill oxidation factors that may materially lower emission reductions — the same standard should apply consistently to the continued recognition and future issuance under all CCP-labelled methodologies in the same category, not only to those assessed after the instrument's publication. Otherwise, methodologies previously approved by ICVCM would continue to be recognized without reflecting updated science, creating misaligned incentives for GHG programs to deprioritize methodology updates, and enabling project proponents to cherry-pick methodologies that will generate higher volumes of CCP-labelled credits. The appropriate safeguards should therefore distinguish the settled past from the live present. ICVCM should: • state clearly and publicly that already-issued CCP-labelled units retain their status and label. • apply instruments consistently on a go-forward basis to approved and newly assessed methodologies and programs, so that the framework remains consistent and science-aligned across vintages issued after the effective date. • manage this transition through clear and consistent effective dates and grace periods set out in our response to Question 4, giving programs and methodologies a structured pathway to adopt updated requirements over time. Programs can then set their own grace periods for projects to transition.
In terms of your ability to keep up to date with ICVCM's work as it develops and publishes these	Published at predictable frequencies, in batches (e.g., twice per year).

instruments, would your organisation find it easier to keep up to date if the changes were:	
Please explain your choice, if needed	Our preference would be 'Published at predictable frequencies, in batches'. Predictable, batched publication is strongly preferred. This allows Verra and our stakeholders to plan for and implement any necessary program updates in an organized way. Ad hoc, rolling publication creates a compliance burden that is difficult to manage alongside existing operational commitments. We would only support deviating from this cadence in rare circumstances where an urgent correction is genuinely necessary. Such exceptions should be clearly flagged as urgent releases and used sparingly. We would also emphasize the importance of standard grace periods following each release. Predictable timelines for when changes must take effect are just as important as predictable publication schedules.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	Yes, CCP-Eligible Programs should be able to request/suggest ICVCM introduce one of these instruments, given that they have direct experience with how the rules are interpreted throughout assessments. Programs are also in a position to help ensure ICVCM is interpreting requirements consistently across assessments. When deciding whether to act on a request, the ICVCM should consider the following: • Equitable access, through an intake process based on published criteria that ensures requests are assessed consistently • Materiality of the issue and whether it is both significant and affects multiple programs • Transparency, through a system for publicly documenting requests and their outcomes The same factors should be taken into account regardless of who suggests or requests an Interpretation, Technical Notice or Clarification.
Should any other stakeholders be able to	Yes

request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Yes, other stakeholders should be able to make such requests through a clearly defined process that is distinct from more general channels for raising issues. Such stakeholders may include project developers, validation and/or verification bodies, credit buyers, academic institutions, and civil society organizations. Particularly, project developers may have valid suggestions based on their experience with approved GHG programs and buyer needs. As in Q7, this request process must be formalized and well-defined, ideally supported by intake procedures based on clear criteria to ensure requests are considered consistently.
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?	Instruments are less suitable for criteria that are framed in qualitative terms or that allow programs to demonstrate equivalence through alternative approaches. Where a program's rules directly quote or paraphrase AF criteria wording, an instrument that changes or adds to those criteria likely constitutes a formal update. ICVCM should be clear when these instruments are actually considered formal updates that will be incorporated into the next issued version of the CCPs/AF when it is published, and should be treated as such. If there is no optionality in adopting these instruments, calling them something other than updates leads to confusion and potentially unintentional lack of conformance among programs. Additionally, several criteria already carry signposted areas for the next iteration of the AF. Using an instrument to address a topic already earmarked for that process would blur the line the system is intended to draw, and we encourage the Integrity Council to reserve those topics for formal revision.

Name	**Julia Paltseva**
Are you responding as...	On behalf of an organisation
Organisation	Environmental Resources Trust (ERT), on behalf of ACR and ART
My organisation is...	A carbon-crediting program
How clear do you find the distinctions between the different instrument types:	The Environmental Resources Trust (ERT), on behalf of ACR and ART, wishes to raise concerns with the proposal that instrument types are necessary at all. We elaborate on this point in detail in response to question 9. Some targeted feedback about distinguishing between the different instrument types is below:

Interpretations, Technical Notices, and Clarifications? What, if anything, would benefit from further explanation?	The boundary between instrument types is vague and self-policed The consultation document distinguishes Interpretations (Tier 2, Governing Board), Technical Notices (Tier 2, Standards Oversight Committee), and Clarifications (Tier 3, Executive Secretariat) based on whether they affect how criteria are assessed. The problem is that the line between "operational clarification" and something that materially affects assessment outcomes is inherently judgment-dependent. The document acknowledges this risk — the governance system is supposed 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 — but doesn't specify a mechanism or appeals process for challenging that classification. If a Clarification is misclassified downward, it can take effect without public consultation or a grace period, potentially affecting how programs are assessed inconsistently across different cohorts. There are no explicit mechanisms for programs to challenge instrument classification. The document proposes (in consultation questions 7 and 8) that programs may be able to request new instruments be introduced, but it says nothing about what happens when a program believes a Clarification should have been an Interpretation — i.e., should have triggered consultation and a grace period. There is no appeals or review pathway described for that scenario. Clarifications carry real assessment weight but minimal oversight Clarifications are published by the Integrity Council's Executive Secretariat, under oversight of the ICVCM governance system. Unlike Interpretations and Technical Notices, they don't go to public consultation. Yet the illustrative example in Table 2 — relating to how cessation of monitoring triggers compensation liability — is arguably substantive. If Clarifications are used expansively, programs assessed before and after a given Clarification could be held to meaningfully different standards with no formal notice mechanism. No described process for withdrawing or revising instruments The document addresses how instruments are created and adopted but is entirely silent on what happens when an instrument needs to be corrected, withdrawn, or superseded. If a Technical Notice is found to be scientifically outdated or an Interpretation is challenged, there's no described revision pathway, no indication of whether prior assessments made under that instrument would be revisited, and no mechanism to signal to the market that an instrument is under review.

	As the rule base accumulates instruments over time, conflicts between them become increasingly likely — a later Clarification might sit in tension with an earlier Interpretation, or two Technical Notices could point in different directions on related methodological questions. The document establishes a hierarchy between tiers but says nothing about how conflicts within a tier, or between instruments issued at different times, are identified and resolved.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	Dual Tier 2 governance creates split authority risk Both Interpretations and Technical Notices sit at Tier 2, but they have different approving bodies: Interpretations are adopted by the Governing Board, while Technical Notices are approved by the Standards Oversight Committee under delegated authority from the Governing Board. This means two instruments at the same tier, with equivalent potential impact on assessment outcomes, go through different decision-making bodies. There's no described mechanism for ensuring those two bodies apply consistent standards or coordinate when a topic could plausibly be addressed by either instrument type. An issue framed as "technical" versus "interpretive" could receive very different levels of scrutiny depending on how it's classified.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The proposed instrument system may work well for specifying operational matters, resolving ambiguities, and referencing quantitative parameters that have been settled by an outside body, such as the IPCC. The instrument system will not work well if it materially changes the criteria that those programs or methodologies not yet assessed, or actively undergoing assessment, would have to meet if previously approved programs/methodologies were not held to those same criteria. This is when the CCPs themselves should be evaluated via public consultation following the formal revision process for the Assessment Framework.
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?	It is pertinent to incorporate existing evaluation timelines for program and methodology level assessments, which take on the order of years. Introducing instruments – potentially a multitude – throughout assessments will result in shifting goalposts. Instruments that materially change the assessment criteria should instead inform the next iteration of the CCPs themselves, rather than apply, and certainly not retroactively, to programs or methodologies undergoing assessment.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	The consultation diagram describing the instrument development process shows a sequence of steps — impact assessment, drafting, consultation, adoption, grace period, effective date — but no timeframes are attached to any stage. This creates a structural uncertainty: programs cannot anticipate when a pending instrument will become effective, making compliance planning difficult and potentially creating unequal treatment between programs assessed before and after an instrument is finalized but not yet adopted. Even if the ICVCM does not intend to apply instruments retroactively, the practical effect of publishing guidance that materially impacts an evaluation will result in previously approved programs and methodologies being seen as inherently lacking. In this regard, the stated goal of ICVCM being an independent arbiter of 'what good looks like' will in effect shift the criteria of good.

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 at predictable frequencies, in batches (e.g., twice per year).
Please explain your choice, if needed	Continuously published instruments will result in deep confusion and mistrust of the evaluation system, both by crediting programs willingly undergoing assessment, and by market actors attempting to compare the validity of rules and requirements that resulted in CCP labels. If instruments were to be enacted, publishing at a predictable annual frequency would be most manageable.
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	Should ICVCM decide to adopt any of these instruments, CCP-Eligible Programs should be able to put forward a request considering the programs themselves are the ones undergoing assessment and are materially impacted by any instrument. This should all serve to achieve the stated goal of ICVCM to develop a consistent ruleset, so the overall concern that we share throughout this consultation regarding the practical applicability of any developed instrument remains. For the next question, we selected "No" and are unable to provide further explanation. As such, please see this explanation for our selection of "No": ICVCM has stated pathways for engagement from broader market actors beyond those undergoing direct assessment and welcomes such feedback via dedicated channels. These should remain the mechanisms for other stakeholder input, rather than enabling requests for instruments by any interested party.
Should any other stakeholders be able to request that ICVCM consider introducing an	No

Interpretation, Technical Notice, or Clarification?	
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	
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?	In its first public communication, ICVCM stated it "will undertake an ambitious program, working to bring high-quality, transparent and consistent meta-standards – Core Carbon Principles (CCPs) – to the supply of carbon credits." "Consistent" was intentionally and appropriately included, as consistency is critical to set the expectations needed for a market to scale. Unfortunately, with assessments completed for methodologies representing just 4% of issued credits, ICVCM is holding a public consultation on the "evolution of the Core Carbon Principles." This sends exactly the wrong message to the marketplace, providing another rationale for pausing urgently needed action and waiting until standards and expectations are settled. While the premise for the consultation is the "rule architecture," the message to the market is that the CCPs will be changing. The proposed design and operation of the rule architecture will result in non-unified interpretations and decision making relative to what is supposed to be a standardized evaluation process. The consultation proposes publishing various instruments (Interpretations, Technical Notices, Clarifications) to ensure consistent evaluations according to the written requirements, which are the CCPs and the Assessment Framework. Having a multitude of interpretations of criteria captured across various documents essentially concedes that interpretations will be updated over time without formally updating the underlying rules, which implies that evaluations to date have been inconsistent, and will introduce confusion. This will effectively lead to continuous rule updates and result in shifting and non-transparent goalposts. How will evaluation version history or applicable dates of each instrument be tracked? This will cause less stability and does not account for or balance risks for actors who interact with ICVCM assessments, such as carbon credit programs, project developers, investors and credit buyers. If ICVCM wants to change the rules (CCPs), then it should do so via public consultations at a point in the future when the market has stabilized. A piecemeal approach is destabilizing and sends an inconsistent signal. There is no signpost in the consultation for when or whether these interpretations or technical notes will be incorporated into the CCPs. While further narrative guidelines or examples of compliance with current CCPs would be helpful information, ERT urges the need to recognize that rolling requirements will cause confusion and result in the same CCP label meaning different things based

	on which instrument applied to it. The implied continuous updates may also have the effect of buyers waiting until the next "better" batch. Ultimately, carbon crediting programs assessed at different points in time — or under instruments classified differently — could face a meaningfully uneven playing field.

Name	Miss Lucinda Diop
Are you responding as...	An individual
Organisation	
My organisation is...	
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?	The distinction is conceptually clear but the operational boundaries could benefit from further explanation. Interpretations are meant to address ambiguity in existing CCP rules without changing them. Technical Notices communicate updates to methodologies, tools, or program requirements. Clarifications correct errors or misunderstandings. What would benefit from further explanation: 1. Appealability. If a carbon-crediting program disagrees with an Interpretation, is there a formal appeal process? The current architecture suggests Interpretations are non-disputable, which may create implementation friction. 2. Retroactive application. When a Technical Notice updates a methodology, does it apply to already-registered projects or only to new registrations? The framework should specify a transition period. 3. Materiality threshold. Not every error requires a formal Clarification. What constitutes a material error worthy of a formal instrument versus a simple FAQ update? 4. Stakeholder consultation. Interpretations that change how a rule is applied could have significant market impact. Will there be a consultation period for Interpretations, or only for Technical Notices and substantive CCP changes? Adding clarity on these four points would make the instrument hierarchy more usable for both carbon-crediting programs and market participants.
What factors should influence ICVCM's choice between an Interpretation,	The choice between an Interpretation, Technical Notice, or Clarification should depend on three factors: the nature of the issue, its market impact, and whether stakeholder consultation is required.

a Technical Notice, and a Clarification for a given topic?	1. Nature of the issue Instrument When to use Interpretation A CCP rule is ambiguous or has multiple plausible readings. The ICVCM is not changing the rule, only resolving ambiguity. Technical Notice A methodology, tool, or program requirement is outdated or needs refinement. The change is substantive but not a full CCP revision. Clarification A document contains an error (typographical, mathematical, or logical) that needs correction without changing intended meaning. 2. Market impact Instrument Impact level Interpretation High impact – affects how rules are applied across all programs. Should be used sparingly and with advance notice. Technical Notice Medium impact – affects specific methodologies or tools. Should include a transition period. Clarification Low impact – corrects obvious errors. No transition period needed. 3. Stakeholder consultation Instrument Consultation required? Interpretation Yes – because it changes how rules are applied, stakeholders should have advance notice and opportunity to comment. Technical Notice Yes – for major methodology updates. For minor updates, a shorter consultation or notification period may suffice. Clarification No – corrections of obvious errors do not require consultation. Additional factor – urgency. If a methodology is found to be systematically over-crediting, the ICVCM should issue a Technical Notice with expedited review, not wait for a full consultation cycle. The clearest test: ask whether a reasonable expert would have predicted the outcome before the instrument was issued. If yes, a Clarification suffices. If no, the issue merits at least a Technical Notice with consultation.

For what types of technical updates do you think this system will work well, and where might it be less suitable?	Where the system will work well: 1. Methodology parameter updates. Updating default values (e.g., emission factors, global warming potentials) based on new scientific data fits the Technical Notice process well. These updates are technical, non-controversial, and benefit from periodic revision. 2. Alignment with external standards. When ICVCM needs to align CCP requirements with updated ISO standards, UNFCCC decisions, or CORSIA rules, a Technical Notice provides the right level of formality without reopening full CCP negotiations. 3. Correction of calculation errors. Errors in methodology equations, reference data, or tool outputs are well-suited for Clarifications. These are objective fixes that do not change policy intent. 4. Resolving ambiguity in existing rules. When a CCP rule has two plausible readings, an Interpretation can resolve the ambiguity efficiently. This works well for boundary cases that were not anticipated during CCP development. Where the system may be less suitable: 1. Substantive policy changes. If ICVCM determines that a CCP rule is fundamentally flawed (e.g., additionality criteria are too weak), this should go through a full CCP revision with stakeholder consultation, not a Technical Notice or Interpretation. 2. Controversial methodological shifts. Changes that would render existing projects ineligible or significantly reduce credit issuance (e.g., tightening baseline methodologies for REDD+) should not be done via Technical Notice without consultation. The market impact is too high. 3. Retroactive application. The framework does not clearly address whether a Technical Notice applies to already-registered projects. If the answer is "yes," this could undermine market confidence. If "no," it creates two tiers of credits. This ambiguity needs resolution before the system can work well. 4. Interpretations that effectively change rules. Where an Interpretation resolves ambiguity by choosing one reading over another, and that choice has significant market consequences, stakeholders should have a consultation period. The distinction between "clarifying" and "changing" is not always clear. 5. Updates requiring jurisdictional coordination. For Jurisdictional REDD+ programs, methodology updates may require coordination with national governments. A simple Technical Notice may not be sufficient; the process should allow for government consultation. Recommendation: The system will work well for technical updates that are objective, non-controversial, and forward-looking. It will be less suitable for changes that are subjective, controversial, or retroactive. The ICVCM should clearly define which types of updates are excluded from the Technical Notice process and require full CCP revision instead.

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?	The need for and length of a grace period should be guided by three factors: the type of instrument, the impact on existing projects, and the complexity of compliance. 1. Type of instrument Instrument Grace period needed? Typical length Clarification No Immediate effect Interpretation Yes, if it changes established practice 3–6 months Technical Notice Yes 6–12 months CCP revision Yes 12–24 months Clarifications correct obvious errors and should take effect immediately. Interpretations and Technical Notices change how rules are applied and require time for programs and project developers to adjust. Full CCP revisions require the longest grace period. 2. Impact on existing projects Impact level Grace period Example Low (no existing projects affected) 0–3 months New methodology for a novel technology with no registered projects Medium (some existing projects affected) 6–12 months Updated default values that change credit calculations for active projects High (all existing projects affected) 12–24 months Change to additionality criteria that could delist entire project categories If an update would make existing registered projects non-compliant or reduce their credit issuance, a longer grace period is necessary to protect market confidence. 3. Complexity of compliance Complexity Grace period Example Low (simple administrative change) 0–3 months New reporting field in monitoring template Medium (requires process adjustment) 3–6 months New VVB documentation requirement High (requires system changes) 6–12 months API-based cross-registry verification

	If compliance requires carbon-crediting programs or project developers to build new systems, retrain staff, or renegotiate contracts, the grace period must be long enough to complete these tasks. General principles: · Grace periods should be longer for retroactive application (changes that affect already-issued credits) than for forward-looking changes. · The ICVCM should publish a single effective date for each instrument, not multiple dates for different stakeholder groups. · Extensions should be granted only in exceptional circumstances, not as a default practice. · The ICVCM should provide a transition roadmap at the time the instrument is published, not after. Default rule of thumb: Instrument Default grace period Clarification 0 months Interpretation 3 months Technical Notice 6 months CCP revision 12 months These default periods may be extended based on the impact and complexity factors above, but the ICVCM should explain any departure from the default.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	The ICVCM should adopt a clear presumption against retroactivity. However, there are limited circumstances where some form of retroactive application may be necessary. The following factors and safeguards should guide those rare exceptions. Core principle: No instrument shall apply to credits already issued and retired. Retirement is the point of no return. Factors to consider in avoiding retroactivity: Factor Application Stage of project lifecycle Pre-registration (design phase) vs. registered vs. credits issued vs. credits retired. Retroactivity becomes more problematic at each later stage. Reliance interest Whether project developers and credit buyers reasonably relied on the existing rule when making investment

decisions.
Market disruption risk Whether retroactive application would cause price volatility, credit invalidation, or loss of market confidence.
Proportionality Whether the harm caused by the past practice outweighs the harm of retroactive correction.
Feasibility of prospective application Whether the issue can be adequately addressed by applying the new rule only to future registrations or future crediting periods.

Safeguards to protect against retroactivity:

1. Clear effective date. Every instrument must specify a single effective date. No instrument shall be applied retroactively unless explicitly justified in writing.
2. Grandfathering of registered projects. Changes to methodology requirements shall not apply to projects already registered before the effective date. Such projects may continue under the previous rules for the duration of their current crediting period.
3. Crediting period renewal as transition point. When a registered project renews its crediting period, it may be required to comply with updated rules at that time. This is not retroactivity; it is prospective application at a natural transition point.
4. No clawback of issued credits. Once credits are issued and transferred to a buyer, no instrument shall require their cancellation or recision. The only exception is proven fraud, which is beyond the scope of this rule architecture.
5. Transition period for active but not-yet-issued reductions. For projects with monitored but unverified reductions at the effective date, the ICVCM should allow a reasonable transition period (e.g., 6 months) to complete verification under the old rules.
6. Explicit exception disclosure. If the ICVCM determines that retroactive application is unavoidable (e.g., a methodology is found to be systematically over-crediting by an order of magnitude), the ICVCM must:
- Publish a detailed justification
- Consult with affected stakeholders
- Provide a minimum 12-month transition period
- Offer compensation or remediation mechanisms where feasible

Default rule:

Stage Retroactivity permitted?
Pre-registration (design phase) Yes, at any time
Registered, no credits issued Yes, with 6-month transition
Credits issued, not retired Yes, with 12-month transition and compensation mechanism

	Credits retired No Recommended safeguard language for the Assessment Framework: "No Interpretation, Technical Notice, or Clarification shall apply to carbon credits that have been retired prior to the effective date of the instrument. For credits issued but not yet retired, the ICVCM shall provide a minimum transition period of twelve months and shall not require cancellation of credits without compensation."
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 at predictable frequencies, in batches (e.g., twice per year).
Please explain your choice, if needed	
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes
What factors should ICVCM take into account in deciding whether to do so?	
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes

Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Yes, CCP-Eligible programs should be able to request an Interpretation, Technical Notice, or Clarification. The ICVCM should consider the following factors when deciding whether to grant such a request. 1. Widespread applicability Is the issue relevant to multiple CCP-Eligible programs, or is it unique to a single program? The ICVCM should prioritize requests that affect several programs over those that are idiosyncratic. Applicability Priority Affects 3+ programs High Affects 2 programs Medium Affects 1 program Low (program should resolve internally) 2. Market significance Does the issue materially affect market confidence, credit integrity, or buyer willingness to pay a premium for CCP-labelled credits? The ICVCM should prioritize issues that have or could have significant market impact. 3. Urgency Is the issue causing ongoing harm (e.g., systematic over-crediting, double counting, or market confusion)? Urgent issues should be expedited. Non-urgent issues can follow normal consultation timelines. Urgency Response time Active harm (e.g., fraud, double counting) Expedited review (weeks) Potential future risk Standard review (months) Clarification of minor ambiguity Standard review or defer 4. Clarity of the request Does the program provide a specific, well-defined question with evidence of the ambiguity or error? Vague or overly broad requests should be returned to the program for refinement.

Request quality Action
Specific, with evidence Proceed to consultation
Vague or broad Return to program for clarification
Request for policy change (not interpretation) Redirect to CCP revision process

5. Whether the issue requires consultation

Some requests (e.g., correction of an obvious typo) do not require stakeholder consultation. Others (e.g., an Interpretation that changes how additionality is assessed) require full consultation.

Issue type Consultation required?
Obvious error (typo, miscalculation) No
Ambiguity in rule application Yes, limited consultation
Substantive methodological question Yes, full consultation

6. Consistency with prior decisions

Has the ICVCM already addressed the same or a substantially similar issue? If yes, the ICVCM should either apply the same reasoning or explain why this case is different. Inconsistent decisions without explanation undermine credibility.

7. Resource availability

Does the ICVCM have the technical capacity to address the request in a timely manner? If not, the ICVCM should communicate expected timelines to the requesting program and prioritize based on the factors above.

Recommended process:

Step Action
1 Program submits written request with supporting evidence
2 ICVCM assesses request against factors 1–7
3 ICVCM decides: Accept, Reject, or Request Clarification

	4 If accepted, ICVCM follows the appropriate instrument process (Interpretation, Technical Notice, Clarification) 5 ICVCM publishes decision and reasoning, regardless of outcome Transparency requirement: The ICVCM should publish an annual summary of requests received, accepted, rejected, and pending, without disclosing confidential information. This builds trust and helps programs understand what types of requests are likely to succeed.
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?	Yes. Certain CCP criteria are inherently subjective or context-dependent, making them less suitable for resolution through Interpretations, Technical Notices, or Clarifications. Worse, the ambiguity of these criteria creates exploitation opportunities that a simple Interpretation cannot fix. 1. Criteria requiring qualitative judgment Examples: Criterion 7.6 (rights of Indigenous Peoples and local communities), Criterion 7.7 (respect for human rights), Criterion 7.8 (gender equality) Why Interpretations may not work well: These criteria require site-specific, context-dependent assessments. A single Interpretation cannot resolve every ambiguity because what constitutes "respect for human rights" or "gender equality" varies by jurisdiction, culture, and project type. Attempting to interpret these criteria at a global level risks oversimplification or cultural insensitivity. How the existing rule can be exploited: Project developers can exploit the lack of clear, measurable standards by checking boxes on a form without meaningful implementation. For example: Exploitation tactic How it works Token FPIC Conduct a community meeting, claim Free Prior and Informed Consent was obtained, but ignore substantive concerns raised by community members. The rule does not define what constitutes meaningful consent. Generic gender statement Include a boilerplate paragraph about gender equality in the project design document. No requirement for gender-disaggregated data, specific actions, or measurable outcomes. Self-certification of human rights Assert that the project respects human rights without independent verification. The rule does not require third-party audit of social safeguards. Alternative approach: Develop tiered guidance (e.g., high-risk, medium-risk, low-risk categories) with specific, verifiable

	indicators rather than issuing Interpretations that claim to resolve all cases uniformly. Without measurable standards, these criteria will remain vulnerable to box-checking fraud. — 2. Criteria tied to dynamic external systems Examples: Criterion 6.1 (preventing double issuance across programs), Criterion 8.2 (existing host country legal requirements) Why Technical Notices may not work well: These criteria depend on external systems (other registries, national laws) that change without notice. A Technical Notice issued today may be obsolete tomorrow when a host country amends its environmental regulations or a new registry launches without cross-registration checks. How the existing rule can be exploited: Exploitation tactic How it works Timing arbitrage Register a project in Country A before a law banning double registration takes effect. Then register the same project in Country B. The rule looks backward at the time of registration, not forward. Cross-registry blind spots If Registries A and B do not share data in real time, a project developer can register the same project with both before either registry detects the overlap. The rule requires prevention but does not mandate the technical infrastructure (e.g., API-based cross-registry verification) to achieve it. Exploiting legal uncertainty Host country passes a law but enforcement is weak or delayed. Project developer claims the law is not yet "enforced" and therefore does not affect additionality. The rule does not define what constitutes "enforcement." Alternative approach: Require real-time API-based cross-registry verification before issuance (see my separate proposal for Criterion 6.1) and establish a clear, objective test for what constitutes "enforced" legal requirements. — 3. Criteria with inherent measurement uncertainty Examples: Criterion 5.2 (quantification of GHG reductions), Criterion 10.6 (attribution of reductions to the project, not

	exogenous factors), Criterion 9.4 (reversal risk assessment) Why Technical Notices may not work well: Measurement uncertainty cannot be eliminated by issuing better rules. No matter how precise the methodology, there will always be a range of possible outcomes. Exploiting that range is the core vulnerability. How the existing rule can be exploited: Exploitation tactic How it works Conservative bias gaming The rule requires "conservative" quantification. But conservatism can be applied asymmetrically. A developer can choose the most aggressive assumptions within a range that is still technically "conservative" relative to the extreme worst-case. Uncertainty hiding Aggregate uncertainty from multiple sources (models, parameters, measurements) but treat them as independent when they are actually correlated. The resulting uncertainty estimate is artificially low, allowing more credits to be issued. Exogenous factor omission Claim the project reduced emissions. Ignore that an economic recession or unusually favorable weather did most of the work. The rule requires consideration of exogenous factors but does not specify how to isolate project impact from external variables (see my separate proposal for Criterion 10.6). Risk model manipulation For reversal risk (e.g., forestry projects), use optimistic assumptions about fire, pest, or drought risk to reduce buffer pool contributions. The rule allows risk-proportional contributions but does not require independent validation of risk models. Alternative approach: Require standardized uncertainty budgets, independent validation of risk models, and cross-validation against external data sources (satellite imagery, weather data, economic indicators). These are matters of technical practice, not rule interpretation. — 4. Criteria requiring retrospective judgment Examples: Criterion 8.3 (prior consideration of carbon credits), Criterion 8.9 (prior consideration for Jurisdictional REDD+) Why Clarifications may not work well: These criteria ask whether a project developer considered carbon credits before starting

	the project. The evidence is historical and often subjective. No amount of post-hoc clarification can fix a lack of contemporaneous documentation. How the existing rule can be exploited: Exploitation tactic How it works Backdating documents Create meeting minutes, emails, or stakeholder consultation records after the fact, dated before the project start date. VVBs have limited ability to verify authenticity of historical documents. Vague evidence Submit a generic letter of intent that mentions "exploring carbon finance options" without specificity. The rule does not require evidence that carbon credits were the decisive factor, only that they were "considered." Exploiting the grace period The rule allows up to one year after the start date to provide evidence. A developer can start the project, see if it succeeds, and only then create the documentation. The rule's grace period becomes a loophole. Alternative approach: Require evidence to be dated and signed before the project start date, with a maximum grace period of three months (not one year). Acceptable evidence should be limited to specific documents (e.g., board resolutions, investment committee approvals, signed consulting agreements) rather than vague letters of intent. — Summary Table Criterion type Why rules don't work well Primary exploitation risk Better tool than Interpretation/Notice Qualitative judgment (7.6, 7.7, 7.8) Context-dependent; cannot be globally interpreted Token compliance, box-checking Tiered guidance with verifiable indicators Dynamic external systems (6.1, 8.2) External systems change without notice Timing arbitrage, cross-registry blind spots Mandatory API-based verification Measurement uncertainty (5.2, 10.6, 9.4) Uncertainty cannot be eliminated by rules Asymmetric conservatism, correlated uncertainty omission, exogenous factor omission Standardized uncertainty budgets, independent validation, cross-validation with external data Retrospective judgment (8.3, 8.9) Evidence is historical and subjective Document backdating, vague evidence, grace period exploitation Strict contemporaneous documentation requirements, short grace periods

	— Bottom line: Interpretations, Technical Notices, and Clarifications are useful tools for resolving ambiguity in well-designed rules. But they cannot fix rules that are inherently subjective, dependent on external systems, or vulnerable to measurement manipulation. For these criteria, the ICVCM should consider substantive revisions to the CCP criteria themselves, not further interpretations of flawed rules.

Name	**Mr Beau Garrett**
Are you responding as...	On behalf of an organisation
Organisation	Tradewater
My organisation is...	A carbon project developer
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?	We recommend clear escalation criteria when a Clarification's scope is disputed.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	We are concerned that ICVCM may use Clarifications to make changes that actually have material impact on requirements for superpollutant project types without triggering the consultation and grace period protections that Interpretations and Technical Notices would require. We advocate for explicit guidance that any instrument touching baseline methods or additionality criteria for superpollutant projects must be classified as a Technical Notice or Interpretation, not a Clarification.
For what types of technical updates do you think this system will work well, and	Superpollutant projects are sensitive to updates to GWP and characterization parameters, some of which IPCC updates every assessment cycle. A Technical Notice is an appropriate instrument to update these parameters through a structured, consulted procedure. The same goes for potential updates to verification protocols such as halocarbon destruction removal efficiency requirements. On the other hand, Interpretations touching on additionality criteria for specific project categories with rapidly

where might it be less suitable?	evolving national/regional regulatory contexts or quantification criteria where science is actively contested should involve project developer input.
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?	For superpollutant projects with long lead times, grace periods should be at minimum 18–24 months. For example, regional scoping, landowner outreach, and validation for orphaned gas wells can take well over a year, and international ODS destruction projects can take several years to build government and industry relationships and secure transboundary shipment approvals.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	We advocate for explicit avoidance of retroactivity for projects already registered under an approved methodology, which would also cover projects that are mid-verification or monitoring cycle, as well as credits already issued an in the market for CCP-approved methodologies. This would prevent project developers and buyers from serious liability and reputational exposure, particularly for projects with no or insufficient grace period.
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:	It is not important to my organisation.
Please explain your choice, if needed	
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes

What factors should ICVCM take into account in deciding whether to do so?	ICVCM should consider impact on market consistency, specifically whether the requested instrument addresses a Program-specific issue or aligns with global standards across all Programs.
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	We advocate that project developers be able to formally request Interpretations or Technical Notices, with a reasoned petition process, as they may have direct knowledge of where the Assessment Framework creates ambiguity for projects that the CCP-Eligible Program may not proactively surface.
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?	Static Interpretations may become outdated quickly for Additionality criteria for ODS and HFC destruction where “regulatory surplus” determinations depend on rapidly evolving enforcement procedures in different countries. Additionally, any Technical Notice dealing with Quantification/GWP criteria could have outsized commercial impact on superpollutant credits relative to CO_2 projects.

Name	**Clement Georget**
Are you responding as...	On behalf of an organisation
Organisation	Rainbow
My organisation is...	A carbon-crediting program
How clear do you find the distinctions between the different instrument types:	The three-tier structure is logical and the distinctions are broadly clear. We recommend that ICVCM publish an explicit classification test to determine which instrument type applies in a given case. The illustrative

Interpretations, Technical Notices, and Clarifications? What, if anything, would benefit from further explanation?	Clarification in Table 2 reads as substantive in practice. Programs need predictable criteria for anticipating which tier an issue will fall into before a determination is made.
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	The primary factor should be whether an instrument changes assessment outcomes for any program, not only whether it formally amends rule text. Issues that have been applied inconsistently across program assessments should default to at least a Clarification, and likely an Interpretation, to ensure coherent application of the rule base.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	The system works well for established methodology categories with settled technical parameters, where precision updates represent clear improvements. It might be less suitable for novel or emerging categories where parameters are still maturing, or where programs legitimately address a requirement through different structural approaches. In those cases, a single instrument may treat a symptom while the underlying question requires a process-level resolution. More broadly, as the number of CCP-Eligible Programs grows, ICVCM should define explicit prioritisation criteria for instrument development. This would strengthen the system's credibility, help stakeholders anticipate the forward agenda, and allow ICVCM to manage its capacity effectively as the universe of programs diversifies.
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?	Grace periods should be proportional to operational complexity. Technical changes affecting project-level monitoring or quantification require longer lead times than administrative or procedural adjustments. For methodologies in emerging categories, periods should also account for the comparatively limited pool of benchmarks and precedents available to project developers.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Rainbow supports the prospective application principle. A key safeguard we recommend: the rules in force at the time of a methodology submission should be formally documented and publicly accessible. This gives both programs and auditors a clear, timestamped reference point if an instrument is adopted during a long assessment process, and avoids ambiguity about which version of the rule base applied.

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:	We favour batch publication twice per year, with a published forward agenda indicating which topics are under development. This allows smaller organisations to plan their review cycles and staff engagement accordingly. Rolling publication risks important instruments being missed. Matters of genuine urgency can be flagged and fast-tracked, but should still be previewed in advance wherever possible.
Please explain your choice, if needed	Covered in previous question
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes. CCP-Eligible Programs are often the first to encounter gaps or ambiguities in practice, and they have direct accountability for compliance. There should be a formal, documented pathway for requests, including acknowledged receipt, a brief rationale for accepting or declining, and an indicative timeline. This mechanism would also help ICVCM identify recurring issues across multiple programs that warrant systemic attention, turning individual experience into shared improvements.
What factors should ICVCM take into account in deciding whether to do so?	Covered in previous question
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes, with a filter. Validation and verification bodies, expert NGOs, and research institutions have direct engagement with the Assessment Framework in practice and should be eligible to submit requests. ICVCM should apply consistent criteria: Does the issue affect multiple actors? Is it technically substantive? Has it arisen in practice rather than theory? A lightweight triage step would prevent the channel from being overwhelmed.
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Covered in previous question
Are there any specific CCP criteria or requirements for which Interpretations, Technical Notices or	Requirements that are assessed at both program level and methodology level can create structural tensions that a single instrument may not fully resolve. Addressing one dimension in isolation may leave the other unresolved, resulting in persistent ambiguity for programs operating under both tiers simultaneously. We recommend that ICVCM build cross-tier consistency checks into the instrument development process,

Clarifications might not work well, due to the nature of the existing rule?	particularly as more programs with structurally diverse approaches seek CCP status. Where such tensions are identified, ICVCM should consider whether an instrument is the appropriate remedy or whether a process-level review is needed.

Name	Castillo Chavez, Francisco Uriel
Are you responding as...	On behalf of an organisation
Organisation	TUVSUD
My organisation is...	Another type of organisation not listed above (Global testing, inspection, certification and training organisation)
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?	Las distinciones son claras a nivel conceptual. Sin embargo, en la práctica puede haber solapamientos entre interpretaciones y notas técnicas, particularmente cuando ambas pueden influir en la evaluación de criterios. Se sugiere proporcionar criterios operativos adicionales y ejemplos aplicados para facilitar una implementación consistente entre programas y VVB
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	La selección debería basarse en: - tipo de cambio (conceptual, técnico u operativo) - impacto en la evaluación de criterios - impacto potencial en elegibilidad Sería útil contar con una guía o matriz de decisión para reforzar la consistencia y transparencia del proceso.
For what types of technical updates do you think this system will work well, and where might it be less suitable?	El sistema parece adecuado para ajustes progresivos y aclaraciones. No obstante, puede ser menos adecuado en áreas donde los criterios requieren interpretación estructural o presentan variabilidad en su implementación (por ejemplo, adicionalidad o permanencia). En dichos casos, podría considerarse una revisión más integral del Marco en lugar de múltiples instrumentos sucesivos.
What factors should guide whether a grace period is	Se considera positivo el uso de períodos de adaptación para cambios con impacto significativo.

needed before entry into force on the effective date and how long such a grace period should be?	Desde la perspectiva de implementación, sería útil que estos períodos tengan en cuenta ciclos de validación y verificación, y complejidad técnica de los ajustes Asimismo, se recomienda asegurar la coherencia para evaluaciones en curso.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	El principio de aplicación prospectiva es fundamental y se valora positivamente. Para mayor claridad, podría ser útil definir con mayor precisión los puntos de corte para su aplicación, de modo que se preserve la consistencia de evaluaciones ya realizadas o en curso. Dicho esto, debería enunciarse una prohibición explícita de aplicar nuevas interpretaciones a auditorías ya concluidas y/o decisiones ya emitidas.
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:	Un enfoque combinado podría resultar más práctico: - publicaciones continuas para temas urgentes - publicaciones agrupadas para cambios de menor urgencia Esto ayudaría a equilibrar previsibilidad y capacidad de respuesta.
Please explain your choice, if needed	No response
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Se considera positivo permitir que programas soliciten instrumentos. Sin embargo, sería recomendable definir criterios claros de priorización y evaluación para garantizar un tratamiento consistente. El ICVCM debería evaluar estas solicitudes considerando la relevancia sistémica del tema, evidencia presentada, consistencia con principios CCP e impacto potencial en otros programas.
What factors should ICVCM take into account in deciding whether to do so?	Included in previous question
Should any other stakeholders be able to	Se recomienda permitir la participación de otras partes interesadas, incluyendo VVB.

request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Los VVB pueden aportar información valiosa derivada de la implementación práctica y contribuir a identificar áreas donde se requiere mayor claridad.
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	Included in previous question
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?	Algunas áreas del Marco pueden requerir enfoques más estructurales debido a su complejidad o dependencia de supuestos, por ejemplo: - adicionalidad - permanencia (incluyendo gestión de reversals y riesgos) - baselines y cuantificación - leakage En estos casos, podría ser útil considerar mecanismos para identificar cuándo los instrumentos no son suficientes y se requiere una revisión más amplia del Marco.

Name	**Max DuBuisson**
Are you responding as...	An individual
Organisation	n/a
My organisation is...	n/a
How clear do you find the distinctions between the different instrument types: Interpretations, Technical Notices, and Clarifications? What, if anything, would	Just in terms of terminology, interpretations and clarifications are extremely close to each other, which could cause some confusion. Also, other programs (such as the Climate Action Reserve) already use “clarification” in a way that overlaps with the proposed definition of “interpretation.” I would suggest finding a different term to replace “clarification.” In practice, the distinction between interpretations and technical notices seems quite thin.

benefit from further explanation?	
What factors should influence ICVCM's choice between an Interpretation, a Technical Notice, and a Clarification for a given topic?	Clarifications feel obvious, particularly because of the lack of public consultation. You would presumably only forego public consultation if the clarification was truly low impact. I'm still not fully clear on where to draw the line between interpretations and technical notices. Perhaps interpretations could be framed as "this is what we meant all along and it just wasn't clear," whereas technical notices could be framed as "we've learned something new and want this new thingto apply going forward."
For what types of technical updates do you think this system will work well, and where might it be less suitable?	I think it will work well for: Creating exclusions for techniques, methods, technologies, etc. that have been shown to be weak/flawed/etc. Codifying technical aspects that have become best practice and for which it is reasonable to require their use going forward. Introduction of new datasets or new parameters for data, methods, etc. It is not suitable for areas where the old approach is still reasonable or may still be scientifically defensible and the imposition of a new approach would exclude good projects.
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?	Cost, effort, and/or time required for adoption/compliance. Length of implementation cycles for affected project types. For example, some changes may not be able to be applied retroactively, so those past vintages should not be affected, even if they have not been through verification yet. Verification can take a year or more, but significant changes can't generally be made duringverification. That should be considered in the rules around grace periods.
The rule architecture is designed to avoid retroactive effects. What factors or safeguards should ICVCM take into account in avoiding retroactivity?	Feasibility of implementation. Does the change affect some action that has already occurred, or is there still opportunity to implement the change in a way that affects crediting for a past period?
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	A mix of the above, depending on the urgency.

keep up to date if the changes were:	
Please explain your choice, if needed	No response
Should CCP-Eligible Programs be able to request that ICVCM consider introducing an Interpretation, Technical Notice or Clarification?	Yes Any stakeholder should be able to make requests or suggestions! The decision factors should be no different than those applied when the suggestion originates internally.
What factors should ICVCM take into account in deciding whether to do so?	No response
Should any other stakeholders be able to request that ICVCM consider introducing an Interpretation, Technical Notice, or Clarification?	Yes Any stakeholder should be able to make requests or suggestions! The decision factors should be no different than those applied when the suggestion originates internally.
Which stakeholders, and what factors should ICVCM take into account in deciding whether to do so?	No response
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?	Not necessarily. But some might take significant work and time to make changes (e.g., governance, tracking, etc.). That should be considered both in terms of the scope of the instrument and the determination of grace periods.