

Consultation

Proposed Clarifications on board independence (criterion 1.1 a) 1)) and on the rights of Indigenous Peoples and Local Communities (criterion 7.6 a) 1))

Consultation period: 22 October - 3 December 2026

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1. Introduction

The Integrity Council for the Voluntary Carbon Market (ICVCM) is an independent, non-profit governance body that aims to ensure carbon markets effectively contribute to global greenhouse gas emissions mitigation action and climate finance delivery at scale. The Integrity Council sets and maintains the independent global threshold for carbon credits. This threshold is based on the Integrity Council's Core Carbon Principles (CCPs) and is implemented through the Assessment Framework, which sets out the criteria and requirements for high integrity.

Since publishing the [Core Carbon Principles](#) and [Assessment Framework](#) in July 2023, the Integrity Council has driven a step-change in global carbon market standards. Thirteen major carbon-crediting programs and 45 methodologies have been approved, following rigorous assessment against the Core Carbon Principles.

Under the Integrity Council's "two-tick" assessment process a carbon-crediting program's governance and systems are assessed first, followed by an assessment of the methodologies for designing and implementing carbon projects. Programs are assessed against requirements relating to their governance, social and environmental safeguards, and delivering positive sustainable development outcomes. Methodologies are assessed against requirements intended to ensure that they deliver lasting and robustly measured greenhouse gas emission reductions that would not otherwise have occurred.

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

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

2. Background to this consultation

In 2026, the Integrity Council adopted the [CCP Rule Architecture](#), which establishes a system of Interpretations, Technical Notices, and Clarifications. The Rule Architecture sets out how these instruments are developed, approved and applied, and how they support the application and evolution of the Core Carbon Principles, Assessment Framework and Assessment Procedure. Instruments will now be developed in line with this rule architecture and related processes.

In December 2025, the Integrity Council's Governing Board decided that government-administered programs may be assessed and may, if they meet the relevant criteria and requirements, become CCP-Eligible so long as the Assessment Framework threshold for integrity is maintained and the relevant legal arrangements for assurance and enforcement are agreed with the relevant national authority. In preparing for those assessments, the Integrity Council identified two questions about the application of the Assessment Framework that are not only relevant to government-administered programs: what criterion 1.1 a) 1) requires when it calls for a board comprised of independent board members, and how criterion 7.6 a) 1) applies where a program's own rules do not refer to the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) or ILO Convention 169 by name.

Both questions arise for independent programs as well. Board members may be employees or executives of a parent organisation, nominees of shareholders or members, or representatives of market participants, and independent programs register mitigation activities in countries that have not ratified ILO Convention 169. All carbon-crediting programs, whether independent or government-administered, must meet the same Assessment Framework integrity threshold.

This consultation therefore seeks views on two proposed Clarifications of general application. The first records how the Integrity Council assesses board independence under criterion 1.1 a) 1), for programs of every legal and institutional form. The second records how criterion 7.6 a) 1) is applied. Neither Clarification is specific to government-administered programs, and the Governing Board's decision of December 2025 is not revisited by this consultation.

Although the CCP Rule Architecture does not normally require public consultation on Clarifications, the Integrity Council is consulting on these Clarifications to support a broad discussion on how a consistent integrity threshold can be built and maintained across all types of carbon-crediting program. This does not alter the process for Clarifications under the CCP Rule Architecture and does not create an expectation that future Clarifications will be consulted on. The proposed Clarifications are limited to the matters they address. They do not express any view on the application of other Assessment Framework criteria or requirements, or on governance arrangements outside the scope stated in each Clarification, and they do not limit the Integrity Council's ability to address such matters through a Tier 2 instrument.

Key terms used in this document are listed in the Glossary (section 7). Readers may find it helpful to review them before proceeding.

3. Overview of the CCP Rule Architecture

The three tiers of the CCP rule base are:

- Tier 1 – the Core Carbon Principles (CCPs) and the Assessment Framework;
- Tier 2 – Interpretations and Technical Notices; and
- Tier 3 – Clarifications.

Tier 1 constitutes the authoritative foundation for assessments conducted by the ICVCM.

Tier 2 instruments support the interpretation and technical application of the CCPs and the Assessment Framework and may affect how criteria and requirements are assessed.

Tier 3 instruments support operational implementation and procedural application of the CCP rule base and are not intended to affect how criteria and requirements are assessed.

The Rule Architecture provides for three types of instrument: Interpretations, Technical Notices, and Clarifications (see Glossary in section 7). These instruments sit within the Rule Architecture which explains how they are developed, approved, and applied, and how they relate to the Core Carbon Principles (CCPs) and the Assessment Framework.

The instruments proposed in this consultation are Clarifications. Under the CCP Rule Architecture, Clarifications are limited to operational, procedural, administrative or documentation matters, and are not intended to affect how criteria and requirements are assessed or to affect eligibility. Although Clarifications may be issued by the Executive Secretariat under the Rule Architecture, the Clarifications proposed here will be reviewed by the Standards Oversight Committee, with the advice of the Expert Panel and the views of the Engagement Forum, and submitted to the Governing Board following this consultation, consistent with the Governing Board's request in December 2025.

4. Proposed Clarifications

4.1 Context

The CCPs and the Assessment Framework apply to every carbon-crediting program that applies for assessment, whatever its legal or institutional form. Programs assessed to date include independent non-profit organisations, companies, and programs operated within larger organisations. A growing number of countries are also establishing government-administered programs, including to generate credits for use by entities covered by domestic emissions trading systems or carbon taxes and for international transfer under Article 6.2 of the Paris Agreement.

Criterion 1.1 a) 1) requires a board comprised of independent board members who assume fiduciary responsibility for the organisation and operate according to robust bylaws. The Assessment Framework does not define independence. In assessments to date the Integrity Council has applied a consistent approach based on the relationships and interests of board members and on the body that takes the program's decisions on methodologies, issuance and cancellation, accreditation of validation and verification bodies, and grievances. The variety of forms now presenting for assessment, including programs whose board members are employees of a parent organisation, nominees of shareholders or members, representatives of market participants, or government officials, makes it useful to record that approach so that it is available to all applicants and transparent to the market.

The Assessment Framework applies in addition to the CORSIA emissions unit eligibility criteria, which every applicant must also meet. CORSIA's governance criterion, including its requirements on conflicts of interest and on dissolution planning, therefore continues to apply alongside criterion 1.1 a) 1). CORSIA's Technical Advisory Body (TAB) has addressed how those requirements apply to programs staffed by public officials¹: it has treated dissolution planning as not applicable to government-administered programs, which are likely to have sufficient resources and public obligations to manage such eventualities, and it has determined that, where a programme is and will continue to be exclusively staffed by individuals subject to public service laws prohibiting conflicts of interest, those laws are assessed as if they were "programme procedures".

Criterion 7.6 a) 1) requires carbon-crediting programs to require that mitigation activities recognise, respect and promote the protection of the rights of Indigenous Peoples and local communities in line with applicable international human rights law, UNDRIP and ILO Convention 169. Programs of every kind register mitigation activities in countries that have not ratified ILO Convention 169, and some programs express the relevant protections in their own safeguard rules rather than by reference to the named instruments. The second Clarification records how the criterion has been applied in those circumstances.

4.2 Instruments

The Integrity Council's preliminary view is that both matters can be addressed by recording the approach applied in assessments to date, without amendment of the Assessment Framework, and that the proposed instruments are therefore Clarifications under the Rule Architecture. Where a government-administered program applies for assessment, the Governing Board's decision of December 2025 also requires that the

¹ [ICAO, CORSIA Technical Advisory Body, Clarifications of TAB's Criteria Interpretations Contained in TAB Reports \(November 2025\), section 4.3.3, referring to the TAB Report of October 2020.](#)

relevant legal arrangements for assurance and enforcement are agreed between the Integrity Council and the relevant national authority. Those arrangements are set out in the Integrity Council's Terms and Conditions for carbon-crediting programs and are not the subject of this consultation.

The following Clarifications should be read alongside the Assessment Framework.

4.2.1 Board independence (criterion 1.1 a) 1))

Instrument type	Clarification
Assessment Framework text	1.1 a) In addition to CORSIA requirements related to governance framework, the carbon-crediting program shall: 1) have a board comprised of independent board members who assume fiduciary responsibility for the organisation and operate according to robust bylaws.
Instrument text	1. Body(ies) to which the requirement applies. The requirement applies to the body or bodies with ultimate responsibility and authority for the governance and oversight of the carbon-crediting program, regardless of their name or designation. This includes oversight of key program functions, which may include, without limitation, the approval of methodologies and requirements for activities (e.g. standards and tools), registration of activities, approval of validation and verification bodies, and determination of grievances. These functions may be carried out by staff or other duly authorised bodies and need not be performed directly by the body or bodies to which this requirement applies. Where a parent organisation has delegated that authority to a program-level body(ies) under binding and published terms, the requirement applies to the program-level body(ies). 2. Meaning of independent. A member of that body(ies) may be considered independent where the member has no relationship with, or interest in, the carbon-crediting program, its parent organisation, its owners, members, funders or sponsors, or any market participant whose interests are affected by the program's decisions, that could reasonably be expected to affect the member's judgment in relation to those decisions. Absent other evidence supplied to the contrary, a member is not typically considered to be independent where the member, for example: (a) is, or within the preceding three years has been, an employee or executive of the carbon-crediting program or of its parent or sister organisation; (b) has a business or financial relationship with the carbon-crediting program or its parent organisation, or with a mitigation activity proponent, validation and verification body, buyer or intermediary active

	under the program, other than the receipt of fees for service on the body; (c) has been appointed to represent, or has been nominated by, a shareholder, member organisation, funder or other constituency whose interests are affected by the program's decisions; (d) is subject to direction from any person or body, including a government, that has a policy, fiscal or commercial interest in crediting volumes, revenues or Article 6 authorisations; or (e) is a government official, including an officer or employee of a ministry, government agency, state-owned enterprise or local authority and a member appointed ex officio, of a government that has an interest of the kind described in (d), unless the carbon-crediting program demonstrates that the member is free from direction or undue influence from that government in relation to the body(ies)'s decisions. 3. Composition. A body may be considered as comprised of independent members where a majority (more than 50%) of its members, including the chair or any member with eligibility to vote, are independent within the meaning of paragraph 2. Members who are not independent, including executive members and members described in paragraph 2(c), may sit on the body if in total such members amount only to a minority of members. A program whose structure does not use a board may show, with evidence of practice, that equivalent independence is achieved through other arrangements. 4. Fiduciary responsibility and bylaws. The fiduciary element of the requirement is typically met where members are subject, under the law applicable to the carbon-crediting program and its constitutional instrument, to a duty to act in the interests of the program, with personal accountability for breach. This includes directors' duties under company law, the duties of board members of a foundation or association under the applicable law and statutes, and duties imposed on members of a public body by the law establishing it or by public-service law of general application, where it is enforceable and carries consequences for breach. The bylaws element should detail where the program's constitutional instrument, together with published internal rules, provides for the appointment, term and removal of members, quorum and decision-making, and the identification and management of conflicts of interest including recusal.
Explanatory note	<i>This Clarification records the approach applied in Program-level assessments to date and does not change it. It applies to all carbon-crediting programs. It gives effect to the purpose of the Effective Governance criteria, namely a</i>

	<i>framework of checks and balances to guide the organisation's governing body and staff and to support the organisation's long-term resilience. It also supports the Integrity Council's commitment to conditions that are equivalent among market participants and to rules that prevent capture or undue influence by any participant. Independence is assessed by reference to the member's relationships and interests, not by reference to expertise or background; members with experience of the carbon market are not for that reason treated as lacking independence.</i> <i>Government officials (paragraph 2(e)). A government official is presumed not to be independent because the official remains subject to the direction and discipline of the civil service or the appointing authority; the program may displace that presumption by showing, including providing evidence, that those obligations do not reach the member's conduct on the body. Freedom from direction or undue influence may be demonstrated by, among other things: appointment through a transparent process under published rules; suspension of the member's employment or reporting relationship with the appointing ministry or agency for the term of the appointment; protection against removal without cause during that term; the absence of any power of direction over the member in relation to the body's decisions; a published conflicts-of-interest policy with recusal rules; and, as supporting evidence, written confirmation from the appointing ministry that the member serves in an independent capacity. These indicators are examples and the list is not exhaustive, and may be applied to the program's decision-making structure, including where its members or decision-makers are all officials. In each case the question is whether decisions on crediting are made transparently and free from direction or undue influence.</i> <i>The CORSIA governance requirement on conflicts of interest, including the Technical Advisory Body's treatment of public-service conflict-of-interest law as programme procedures where a programme is exclusively staffed by persons subject to that law, continues to apply in addition to this requirement.</i> <i>Scope. This Clarification does not address decision-making bodies composed entirely of officials of the sponsoring government, single decision-makers, or multi-layered decision structures. Programs with such arrangements may apply. Such arrangements will be assessed against criterion 1.1 a) 1) as it stands, on the same threshold and by reference to the outcomes described in this Clarification, with the evidence the Integrity Council expects set out in the</i>
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	<i>ICVCM's assessment approach approved by the Governing Board. The Integrity Council may consider whether a Tier 2 instrument is required.</i>
Non-technical summary	This instrument records how the Integrity Council assesses whether a program's board is comprised of independent members. A member is independent where he or she has no relationship or interest that could reasonably be expected to affect his or her judgment on the program's crediting decisions, and the board should have a majority of such members, including the chair. The instrument lists the relationships that mean a member may not be treated as independent, including employment by the program or its parent organisation, representation of an interested constituency, and government officials who remain subject to direction. It applies to all programs and does not change how the criterion has been assessed to date.
Relevant Assessment Framework criteria	1.1 a) 1); see also 1.1 a) 2) (annual report) and CORSIA requirements related to governance framework.
Issued by	To be issued by the Executive Secretariat under the CCP Rule Architecture, under delegated authority from the Governing Board, exercised through Standards Oversight Committee oversight.
Effective date	On publication, following the Governing Board meeting at which the outcome of this consultation will be shared.
Application to ongoing assessments	Applies to Program-level assessments in respect of which no Decision under paragraph 2.22 of the Assessment Procedure has been taken on the effective date, including Applications submitted before that date (due to the nature of the instrument as a clarification).
Transition measures	None. The Clarification records the approach applied in assessments to date.

4.2.2 Rights of Indigenous Peoples and Local Communities (criterion 7.6 a) 1))

Instrument type	Clarification
Assessment Framework text	7.6 a) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, the carbon-crediting program shall require mitigation activity proponents to ensure that the mitigation activity: 1) recognises, respects and promotes the protection of the rights of IPs & LCs in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous and Tribal Peoples.
Instrument text	1. The words "in line with" in criterion 7.6 a) 1) refer to the substantive standard of protection set out in applicable international human rights law, the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and ILO Convention 169. Whether the country in which the mitigation activity(ies) is located has ratified ILO Convention 169 or endorsed UNDRIP is not relevant to whether the requirement is met; the same standard applies to every carbon-crediting program and every mitigation activity. 2. A carbon-crediting program meets the requirement either by (a) requiring mitigation activity proponents to comply with the standards of protection set out in UNDRIP and ILO Convention 169 as if those standards applied to the mitigation activity, or (b) requiring compliance with the program's own safeguard requirements, including requirements derived from national law, where the program demonstrates that those requirements provide protection at least equivalent to UNDRIP and ILO Convention 169 in relation to collective rights to lands, territories and resources; free, prior and informed consent; self-determined development priorities and decision-making; cultural heritage; non-discrimination; and access to remedy. 3. A carbon-crediting program relying on (b) shall include its demonstration of equivalence in its Application under section 2 of the Assessment Procedure and shall make it publicly available.
Explanatory note	<i>This Clarification records the approach applied in Program-level assessments to date and does not change it. It applies to all carbon-crediting programs. Criterion 7.6 a) 1) sets a standard of conduct for mitigation activities by reference to the named instruments; it is not a requirement that any State have ratified or endorsed them. Independent programs are not and cannot be parties to those instruments and are assessed against the standard regardless of the treaty</i>

	<i>position of the countries in which their activities are located; the same applies to government-administered programs. ILO Convention 169 has 24 ratifications to date.</i> <i>In assessing a demonstration under paragraph 2(b), the Integrity Council may seek independent expert input and the views of the Engagement Forum.</i>
Non-technical summary	This instrument confirms that the standard of protection for the rights of Indigenous Peoples and local communities is the same for all carbon-crediting programs, whether or not the country in which a mitigation activity is located has ratified ILO Convention 169 or endorsed UNDRIP. Programs whose own rules do not reference those instruments by name may meet the criterion by demonstrating that their safeguards provide equivalent protection, and must publish that demonstration. It applies to independent and government-administered programs alike and records the way the criterion has been assessed to date.
Relevant Assessment Framework criteria	7.6 a) 1)
Issued by	To be issued by the Executive Secretariat under the CCP Rule Architecture, under delegated authority from the Governing Board, exercised through Standards Oversight Committee oversight.
Effective date	On publication, following the Governing Board meeting at which the outcome of this consultation is considered.
Application to ongoing assessments	Applies to Program-level assessments in respect of which no Decision under paragraph 2.22 of the Assessment Procedure has been taken on the effective date, including Applications submitted before that date.
Transition measures	None. The Clarification records the approach applied in assessments to date.

5. Consultation questions

Responses from stakeholders are invited on the questions below through a [dedicated webform](#). Respondents may comment on either or both proposed Clarifications and are encouraged to identify the relevant criterion in their responses. Respondents will also be asked to submit general information about their organisational affiliation.

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

The Integrity Council will review and consider all public consultation responses received, publish the responses with a high-level summary (see publicity notice below), and determine whether and how the Clarifications should be refined before consideration through the Integrity Council's governance process. Where responses indicate that a proposed Clarification may affect how a criterion or requirement is assessed, the Integrity Council will consider whether the matter should instead be addressed through a Tier 2 instrument under the Rule Architecture, and will say so in the consultation summary.

Consultation questions

1. Are the proposed Clarifications clear and consistent with the relevant existing Assessment Framework criteria and requirements? (Yes / Partly / No)
 - a. If "Partly" or "No", please identify the relevant Clarification, explain your concern and propose alternative wording.
2. Does the description of independence in the first Clarification, including the relationships listed in paragraph 2 and the majority threshold in paragraph 3, reflect your understanding of how criterion 1.1 a) 1) has been applied? (Yes / Partly / No)
 - a. If "Partly" or "No", please identify the difference and, where possible, the assessment or program to which you refer.
3. Could either proposed Clarification materially affect how existing or future carbon-crediting programs are assessed, or what a program must do or demonstrate to meet the relevant Assessment Framework requirement? (Yes / No / Unsure)
 - a. If yes, please identify the relevant Clarification, describe the potential impact and, where appropriate, propose alternative wording.

4. Could either proposed Clarification raise or lower the substantive integrity threshold established by the relevant Assessment Framework criterion or requirement? (Yes / No / Unsure)
 - a. If yes, please identify the Clarification, explain how the integrity threshold would be affected, and, if appropriate, propose alternative wording that would retain the same integrity threshold.
5. Are there other Assessment Framework criteria for which a Clarification would assist the criterion's application to carbon-crediting programs of different legal or institutional forms, including government-administered programs? (Yes / No)
 - a. If yes, please identify the criterion, explain the issue that arises in its application and, where possible, propose wording for a Clarification.
6. Are there any Assessment Framework criteria or requirements for which a Clarification would be insufficient to address issues arising from their application to carbon-crediting programs of different legal or institutional forms, including government-administered programs, such that a Tier 2 instrument (an Interpretation or Technical Notice; see section 7) may be required? (Yes / No / Unsure)
 - a. If yes, please identify the criterion or requirement, describe the issue, and explain why you consider a Tier 2 instrument may be necessary. If appropriate, propose wording for the instrument.

6. How to respond

Please submit responses through the [online consultation form](#).

The consultation will be open until **3rd December, 2026, 11.59pm Pacific Time**.

Publicity notice

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

Responses will normally be visibly attributed to the submitting individual or organisation. For that reason, respondents are asked not to include confidential, sensitive, or personal information in their submissions unless strictly necessary.

Requests for anonymisation will be considered on a case-by-case basis against the exceptions criteria set out below. If the request cannot be granted, the respondents will be offered the opportunity to resubmit a response within the consultation window.

Exceptions

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

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

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

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

Languages

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

7. Glossary

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

Term	Definition
CCP rule architecture	The structure, processes, governance arrangements, and pathways for using, developing and adoption of Interpretations, Technical Notices, and Clarifications to support the evolution of the CCP rule base over time.
CCP rule base	The body of rules, instruments, and supporting documents used to apply the Core Carbon Principles and the Assessment Framework in practice. It includes the CCPs, the Assessment Framework, regulatory instruments, and relevant companion documents.
Clarification	An operational instrument that explains how criteria and requirements are implemented in assessment and assurance. Clarifications may focus on procedural, administrative, or documentation matters. They are not intended to affect how criteria and requirements are assessed.
Instrument	A formal document type used within the CCP rule architecture to interpret, apply, or clarify existing requirements. Instruments sit below the CCPs and the Assessment Framework in hierarchy terms and include Interpretations, Technical Notices, and Clarifications.
Interpretation	An instrument adopted by the Governing Board that explains the meaning, scope, or intent of an existing provision in the CCPs or the Assessment Framework or strengthens the way it is implemented. Interpretations may affect how criteria and requirements are assessed.
Material impact	Occurs where a change resulting from an Instrument affects how criteria and requirements are assessed after the Effective Date. Instruments with material impact will often require public consultation and transition measures, such as grace periods.

Non-material impact	Occurs where a change resulting from an Instrument does not affect how criteria and requirements are assessed. Instruments with non-material impact are not expected to affect eligibility or labelling. Instruments with non-material impact are usually operational or administrative in nature, and so transition measures are not usually required.
Technical Notice	An instrument that addresses the technical application of the CCPs or the Assessment Framework criteria and requirements. Technical Notices may deal with methods, parameters, data sources, or technical approaches, and may affect how criteria and requirements are assessed.
Decision-making body	The body of a carbon-crediting program that holds final decision-making authority over the approval of methodologies, the issuance and cancellation of carbon credits, the accreditation of validation and verification bodies, and the determination of grievances, by whatever name it is known. See the first proposed Clarification.
Independent (board member)	A member of a decision-making body who has no relationship or interest that could reasonably be expected to affect the member's judgment in relation to the body's decisions, as described in the first proposed Clarification.