

CLARIFICATIONS TO VCS PROGRAM RULES AND REQUIREMENTS

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This document provides clarifications applicable to the program document referenced in the table below. Such clarifications are effective on the effective date listed in the table. Project proponents and validation/verification bodies (VVBs) must apply and interpret the Verified Carbon Standard (VCS) Program documents consistent with the clarifications set out in this document.

Correction/ Clarification	Description	Document and Section Reference	Effective Date of C&C
Clarification 1	Clarifications to the effective date for updates to Table 1 of the <i>VCS Standard, v5.0</i> , pertaining to eligibility of CFL/LED projects in non-LDC countries	VCS Version 5: Overview of VCS Program Updates and Effective Dates (PDF) , section 1.3, row V5#46	Effective immediately
Clarification 2	Procedures for early adoption of Version 5 requirements before their effective dates	VCS Version 5: Overview of VCS Program Updates and Effective Dates (PDF) , page 1	Effective immediately
Clarification 3	Clarification of section numbers that were revised as part of V5#43 – Removal of “approved GHG programs” and CER conversions	VCS Version 5: Overview of VCS Program Updates and Effective Dates (PDF) , section 1.1, row V5#43	Effective immediately
Clarification 4	Clarification of which late-to-verify procedures are effective by when for projects subject to long-term average (LTA) requirements	VCS Version 5: Overview of VCS Program Updates and Effective Dates (PDF) , section 1.1, rows V5#87, V5#105; section 1.2, row V5#80	Effective immediately

I. Clarification 1: Clarifications to the effective date for updates to Table 1 of the VCS Standard, v5.0, pertaining to eligibility of CFL/LED projects in non-LDC countries

VCS Version 5: Overview of VCS Program Updates and Effective Dates (PDF), section 1.3, row V5#46

#ID	Description of Update	Affected Documents & Section Numbers	Effective Date
V5#46	<p>Default eligibility for project activities (Table 1 in the VCS Standard)</p> <p>Revised Table 1 in the VCS Standard to reframe default exclusions from VCS Program scope as default eligibility for certain project activities. Certain methodologies may specify applicability conditions for project activities based on geography that take precedence over the default geographic eligibility in Table 1.</p> <p>The default eligibility for project activities that replace incandescent electric bulbs with light emitting diodes (LEDs) or compact fluorescent lights (CFLs) and projects that replace CFLs with LEDs (row 6 of Table 1, VCS Standard, v5.0) was restricted to least developed countries (LDCs) only.</p> <p>The final two rows of Table 1 in the VCS Standard, v4.7 (activities installing transmission lines or transformers, and activities reducing HFC-23 emissions) were removed in version 5.0, because no active methodologies currently allow those project activities.</p>	VCS Standard, v5.0, section 2.1.1 and Table 1	<p>Updates to section 2.1.1 and Table 1 in the VCS Standard: Effective immediately.</p> <p>The following exceptions apply:</p> <p>Updates to the default eligibility for LED/CFL projects in Table 1, row 6:</p> <ul style="list-style-type: none"> Projects requesting registration before 1 January 2027 may apply the active version of relevant methodologies (e.g., AMS-II.C) using Table 1 of the VCS Standard, v4.7. Existing projects (i.e., projects that are registered or request registration before 1 January 2027) may continue to use the applied version of the relevant methodologies until their next crediting period renewal, as set out in the VCS Standard, v5.0, section 3.1.5. At the next crediting period renewal, projects must apply an active version of the methodology in accordance with section 3.1.4.¹ For registered projects, new instances for scope-excluded activities may only be added within verification approval requests submitted before 1 July 2027. <p>Effective immediately for all new and revised methodologies under development</p>

Background:

This clarification provides further information about the changes made to Table 1 in the VCS Standard, v5.0. A scope exclusion was made to limit the default eligibility of project activities

¹ A Corrections and Clarifications (C&C) to AMS-II.C and other LED-related methodologies is forthcoming and will include more specific geographic applicability conditions, and their effective dates, for projects applying these methodologies.

which install light emitting diodes (LEDs) or compact fluorescent lights (CFLs) to activities in least developed countries (LDCs) only. Verra has clarified that this update is only effective for registration and crediting period renewal requests submitted on or after 1 January 2027. There is also a cutoff date for adding new instances to grouped projects implementing these activities outside of the eligible geographies. A forthcoming C&C to the relevant methodologies for LED project activities will provide more specific geographic applicability conditions and their effective dates.

II. Clarification 2: Procedures for early adoption of Version 5 requirements before their effective dates

VCS Version 5: Overview of VCS Program Updates and Effective Dates (PDF), page 1

~~For all updates that are not effective immediately, project proponents may choose to conform to them before the effective date. Where a project proponent chooses to do this, the validation/verification body (VVB) validates or verifies the project in accordance with the updated requirements.~~

Project proponents may choose to be validated or verified to VCS Version 5 before its effective dates, under the following conditions:

- The project must conform to all VCS Version 5 requirements. The following exceptions apply:
 - Updates whose effective date is based on the project start date and listing dates do not yet apply.²
 - Updates whose effective dates are based on the next crediting period renewal request or verification approval request that includes baseline reassessment only apply to projects making such requests.
- The project proponent must use the *VCS Project Description Template, v5.0*, *VCS Monitoring Report Template, v5.0*, or *VCS Project Description and Monitoring Report Template, v5.0*, which are forthcoming.
- A validation/verification body must validate and/or verify the project in accordance with VCS Version 5 using the *VCS Validation Report Template, v5.0*, *VCS Verification*

² These are updates V5#49 (project start date and initial crediting period start date), V5#14 (right to operate and right to reductions and removals), V5#16 (stakeholder engagement requirements), V5#58 (financial transparency for benefit sharing), V5#17 (safeguard requirements), and V5#23 (ecosystem conversion safeguards). Thus, a project with a project start date prior to 1 January 2027 may validate under VCS Version 5 prior to 1 January 2027 while applying the *VCS Standard, v4.7* requirements pertaining to safeguards and stakeholder engagement, among others. If the project was listed on the Verra Registry prior to 16 December 2025, it may continue to apply VCS Version 4 start date requirements.

Report Template, v5.0, or VCS Validation and Verification Report Template, v5.0, which are forthcoming.

Background:

Stakeholders have asked to adopt certain VCS Version 5 requirements ahead of their mandatory application from 1 January 2027. Verra has now outlined a clear pathway for early adoption, to ensure consistent reporting and assessment of voluntary conformance with the updated requirements.

III. Clarification 3: Clarification of section numbers that were revised as part of V5#43 – Removal of “approved GHG programs” and CER conversions

VCS Version 5: Overview of VCS Program Updates and Effective Dates (PDF), section 1.1, row V5#43

#ID	Description of Update	Affected Documents & Section Numbers	Effective Date
V5#43	<p>Removal of “approved GHG programs” and CER conversions</p> <p>The concept of “approved greenhouse gas (GHG) programs” has been removed, which means gap validations are no longer permitted. Projects registered with other GHG programs may still register with the VCS Program in accordance with the VCS Program rules after the date of inactivity in the other GHG Program. Verra will also stop accepting Certified Emission Reduction (CER) conversion requests.</p> <p>Projects registering with the VCS Program that were previously registered with another GHG program must establish the project crediting period in accordance with VCS Program rules (i.e., the crediting period length is no longer restricted to the shorter of the VCS Program crediting period length and the other GHG program crediting period length)</p> <p>In the <i>VCS Program Definitions</i>, the definition for “approved GHG programs” and “VCU conversion representation” were removed. The definition for “project description” was revised.</p>	<p><i>VCS Program Guide, v5.0</i>, section 5-6. Section 8 and Appendix 2 from v4.4 was removed.</p> <p><i>VCS Standard, v5.0</i>, section 3.4.1, 3.13.2, 3.21.3 – 3.21.7, 4.1.9, 4.1.15. Sections 3.1.7- 3.1.8, 3.9.7, 4.1.8 from v4.7 were removed.</p> <p><i>VCS Program Definitions, v5.0</i></p> <p><i>VCS Methodology Requirements, v5.0</i>, section 2.3.8, 2.10, 3.5.2(1)</p> <p><i>Registration and Issuance Process, v5.0</i>, section 4.2.12. Sections 4.2.15 – 4.2.18, 4.4.5 and Appendix 1 from v4.6 were removed.</p> <p><i>Procedure for Applying the AFOLU Non-Permanence Risk Tool, v5.0</i>, section 2.2.1(3), Table 1 Q3(h)</p>	<p>Updates to all documents: Effective for all registration requests submitted on or after 1 January 2027</p> <p>New CER conversion requests will not be accepted after 28 February 2026</p>

Background:

Verra has clarified that section 3.9.7 from the *VCS Standard, v4.7* was removed from the *VCS Standard, v5.0* as part of update ID V5#43 (updates related to the removal of the concept of

approved GHG programs, and updated procedures for projects to register with the VCS Program where they were previously registered with another GHG program).

The removed section previously limited the total crediting period length of such projects to the earliest duration allowed under either program.

IV. Clarification 4: Clarification of which late-to-verify procedures are effective for projects subject to long-term average (LTA) requirements

VCS Version 5: Overview of VCS Program Updates and Effective Dates (PDF), Section 1.1, rows V5#87, V5#105; Section 1.2, row V5#80

#ID	Description of Update	Affected Documents & Section Numbers	Effective Date
V5#105	<p>Verification deadlines</p> <p>All project proponents are now required to submit a verification approval request within five years of their project’s last approved verification approval request. Otherwise, projects will be marked as late to verify on the Verra Registry.</p>	<p><i>Registration and Issuance Process, v5.0, section 4.1.2 – 4.1.3</i></p>	<p>Effective for all registered projects from Effective for all project requests submitted on or after 1 January 2027</p>
V5#87	<p>Long-term average</p> <p>The long-term average sections in the <i>VCS Standard</i> and <i>VCS Methodology Requirements</i> have been removed, and instead projects will be required to use the forthcoming VCS tool <i>Calculating the Long-term Average of Forest Carbon Stocks</i>.</p> <p>The definition for “harvesting activity” has been removed from the <i>VCS Program Definitions</i> and instead will be defined in the tool.</p>	<p><i>VCS Standard, v5.0, section 3.2.28</i></p> <p><i>VCS Program Definitions, v5.0</i></p> <p><i>VCS Methodology Requirements, v5.0, section 3.6.13. Section 3.6.6 from v4.4 was removed</i></p> <p><i>Registration and Issuance Process, v5.0, section 4.7.1 – 4.7.2</i></p>	<p>Updates to the <i>Registration and Issuance Process</i>: The late-to-verify procedure for ARR and IFM projects that have reached their LTA is effective from 1 January 2027. Until that date, such projects are subject to the same late-to-verify procedures as all other projects (see V5#80).</p> <p>Updates to all other documents: Effective for all project requests submitted on or after 1 January 2027</p>
V5#80	<p>Inactivation and late-to-verify procedures</p> <p>Updates provide clarity on:</p> <ul style="list-style-type: none"> how to request reactivation of inactive projects 	<p><i>Registration and Issuance Process, v5.0, section 3.1.7 – 3.1.8, 3.1.11 – 3.1.21, 4.7.1 – 4.7.4</i></p>	<p>Effective immediately</p> <p>The following exceptions apply:</p> <ul style="list-style-type: none"> Regarding section 3.1.13 – Verra will start to implement this update (i.e., inactivating pipeline projects that do not respond to findings)

<ul style="list-style-type: none"> • reasons why projects are inactivated (e.g., they do not respond to findings within 90 days at the pipeline listing stage – Section 3.1.13) • why Verra rejects projects or puts projects on hold (e.g., inactive projects are rejected after 12 months if reactivation is not requested – Section 3.1.21(1)). • procedures for late-to-verify projects 		<p>within 90 days) from 15 April 2026</p> <ul style="list-style-type: none"> • Regarding section 3.1.21(1) – Verra will start to implement this update (i.e., rejecting inactive pipeline projects if reactivation is not requested within 12 months) from 1 January 2027 • Regarding sections 4.7.1 and 4.7.2 – The separate late-to-verify procedure for ARR and IFM projects that have reached their LTA is effective from 1 January 2027. Until that date, these projects are subject to the same late-to-verify procedures as all other projects (see V5#87).
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Background:

Verra has clarified that the separate late-to-verify procedures for ARR and IFM projects that are subject to long-term average (LTA) requirements will only come into effect from 1 January 2027. Until that date, such projects must follow the late-to-verify procedures that apply to all other projects, which are effective immediately.