

CORRECTIONS AND CLARIFICATIONS TO THE PLASTIC PROGRAM RULES AND REQUIREMENTS

Publication date: February 16, 2024

This document provides corrections and clarifications applicable to the Plastic Waste Reduction Program (Plastic Program) document(s) referenced in the table below, including their effective date. Project proponents and validation/verification bodies (VVBs) must apply and interpret the Plastic Program documents consistent with the corrections set out in this document.

The corrections will be incorporated into the next issued versions of the program documents.

Correction/ Clarification	Description	Document and Section Reference	Effective Date
Correction 1	<p>Updated project request denial procedures</p> <p>Verra will reference the VCS Program project request denial procedures for the Plastic Program. Any Plastic Program project request may be denied at any point in the review process based on the criteria set out in Section 4.3.5 of the <i>VCS Registration and Issuance Process, v4.4</i>.</p>	<p><i>VCS Registration and Issuance Process, v4.4</i>, Sections 4.3.5–4.3.7, 4.3.8(2), 4.3.9, 4.3.10</p> <p>Complementing the requirements in the <i>Plastic Program Guide, v1.0</i>, Section 5</p>	Effective immediately
Correction 2	<p>Updated VVB sanctions requirements and procedures</p> <p>Verra will reference the VVB sanctions requirements and procedures set out in Section 6 of the <i>VCS Program Guide, v4.4</i> for the Plastic Program. The sanctions include suspension for VVBs that do not conform with program or accreditation requirements, and the introduction of a reinstatement fee, which is incorporated into the <i>Plastic Program Fee Schedule, v1.3</i>.</p> <p>Verra will reference the updated language regarding Verra’s roles and responsibilities in Section 2.5.6 of the <i>VCS Program Guide, v4.4</i> for the Plastic Program.</p>	<p><i>VCS Program Guide, v4.4</i>, Sections 2.5.6 and 6</p> <p><i>Plastic Program Fee Schedule, v1.3</i></p> <p>Complementing the requirements in the <i>Plastic Program Guide, v1.0</i>, Section 3.6</p>	Effective immediately

Correction/ Clarification	Description	Document and Section Reference	Effective Date
Correction 3	<p>Updated timeframe required for VVBs to respond to Verra’s findings in the project review report (PRR)</p> <p>VVBs are required to respond to findings within 60 days from the date the PRR is issued.</p>	<i>Plastic Program Guide, v1.0, Section 5.7.11(6)</i>	Effective immediately
Correction 4/ Clarification 1	<p>Corrected project validation deadline and clarified project start date</p> <p>Section 3.5.2 of the <i>Plastic Standard, v1.0</i> is corrected to: “Projects with a project start date on or before 31 December 2021 shall complete validation by 30 June 2024.”</p> <p>Clarification: The Plastic Program no longer accepts new listing requests from projects with a start date between 1 January 2016 and 31 December 2021.</p>	<i>Plastic Standard, v1.0, Sections 3.5.1 and 3.5.2</i>	Effective immediately

Correction 1: Updated project request denial procedures

Document and section references: *VCS Registration and Issuance Process, v4.4, Sections 4.3.5-4.3.7, 4.3.8(2), 4.3.9, and 4.3.10*

Note: the text below is a verbatim copy of the referenced sections for project denials from the VCS Registration and Issuance Process, v4.4. For its implementation, all references to the “VCS Program” will be substituted by the “Plastic Program” and its related rules and requirements.

4.3.5 Verra may deny a project request at any point during the review process under the following:

- 1) Where documentation is deemed incomplete, of unsatisfactory quality, or where immediate non-conformances with the VCS Program rules are identified.
- 2) The project proponent or validation/verification body significantly alters the project documents outside the scope of the findings issued by Verra.
- 3) Where findings are not satisfactorily closed after three rounds of review.
- 4) No response is received from the validation/verification body within 60 days from the date the project review report was issued.

4.3.6 Where a request is denied:

- 1) Verra notifies the project proponent and uploads the project review report (if applicable) and a letter to the Verra Registry stating the reason that the request was denied.

- 2) Verra changes the registry status to the relevant denial status (e.g., *registration request denied*).
 - 3) A new request may be submitted after 90 days from the date of denial.
- 4.3.7 To submit a new request the project proponent or its authorized representative must:
- 1) Email registry@verra.org, stating the project is submitting a new request following a denial.
 - 2) Submit all relevant project documents to the Verra Registry as set out in Sections 4.2.3, 4.2.5, and 4.2.5 and a letter to [sic] detailing the steps taken to address the reasons for denial.
- 4.3.8 Project proponents submitting a new registration request shall:
- 2) Submit the new request no later than one year from the date the request was denied. Where the new request is not submitted within one year of denial, the project is rejected, and the status is changed to *rejected by administrator*.
- 4.3.9 Where the findings are not addressed to the satisfaction of Verra after two denials at registration request, the project is rejected and the status is changed to *rejected by administrator*.
- 4.3.10 Project proponents shall submit a new crediting period renewal request within one year of denial, or the status is changed to *inactive*. Where the findings are not addressed to the satisfaction of Verra after two denials of a crediting period renewal request, the project status is changed to *inactive*.

Background:

Verra is incorporating the most recent updates to the VCS Program project request denial procedures into the Plastic Program to enhance program integrity and consistency across Verra program rules and requirements.

Correction 2: Updated VVB sanctions requirements and procedures

Document and section references: [VCS Program Guide, v4.4, Sections 2.5.6 and 6](#)

Note: the text below is a verbatim copy of the referenced sections for VVB sanctions in the VCS Program Guide, v4.4. For its implementation, all references to the “VCS Program” and “VCUs” will be substituted by the “Plastic Program” and “Plastic Credits,” respectively, and the Plastic Program’s related rules and requirements.

- 2.5.6 The VCS Program is managed by Verra, which is an independent, non-profit organization incorporated under the laws of the District of Columbia in the United States. Verra is responsible for managing, overseeing, and developing the program. It maintains an impartial position in the market and does not develop projects, programs, or methodologies, nor does it provide validation, verification, or consulting services.

One of Verra's roles is in respect of overseeing and ensuring the integrity of projects, programs, and VCUs in the Verra Registry system. Verra conducts reviews of project and program registration and verification requests. Verra is also responsible for overseeing the validation/verification bodies operating under the VCS Program.

Verra's review of projects is conducted in accordance with the *Registration and Issuance Process*. The review ensures that the validation/verification body has appropriately assessed, and fully described how it has assessed, the project's conformance with the VCS Program rules. Reviews do not replace validation or verification.

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

Where Verra identifies shortcomings in a validation/verification body's performance, Verra provides feedback and requires the validation/verification body to address non-conformities. Verra also reports validation/verification body performance to the respective accreditation body.

Verra reserves the right to take action against validation/verification bodies and implement sanctions in accordance with the provisions set out in the agreements signed with Verra (See Section 6). The rights and obligations for validation/verification bodies are set out in such agreements.

Verra reserves the right not to list projects, register projects and programs, or issue VCUs where it deems that they do not conform with the VCS Program rules or may otherwise impact the integrity of the VCS Program or the functioning of the broader carbon market. Verra reserves the right to cancel VCUs or to reject, put on hold, or inactivate projects where it deems that they have not been registered or issued in conformance with the VCS Program rules. At listing, Verra may deny the request and/or reject the project where the listing request is frivolous, vexatious, or an abuse of process. Verra makes the reasons for such decisions publicly available on the project page on the registry.

Verra is also responsible for managing the methodology development and review process, and it reserves the right to not accept methodologies into the process, put on hold or reject methodologies in the development and review process, or review, revise or set as inactive previously approved methodologies where it deems that they do not conform with the VCS Program rules, would sanction politically or ethically contentious project activities, or may otherwise impact the integrity of the VCS Program or the functioning of the broader carbon market.

Verra may convene steering committees, advisory committees, or working groups to support its work in specific areas. These groups draw in expertise from outside the organization to

develop and support specific elements of the VCS Program. A full list of steering committees and working groups is available on the Verra website.

6. VALIDATION/VERIFICATION BODY SANCTIONS

Based on its oversight activities, Verra has sole discretion to apply sanctions that vary according to the severity of issues and/or non-conformance(s) where validation/verification bodies are:

- 1) Found by Verra to be conducting services out of conformance with the governing accreditation body and/or VCS Program rules, or
- 2) Deemed by Verra to be performing poorly.

Warning Issuance

Where Verra deems sanctions are merited, it may issue a warning notice and non-conformity report to the validation/verification body, requiring it to undertake a root cause analysis and identify corrective actions for addressing the identified issues. The root cause analysis and corrective action plan must be submitted to Verra within the time frame identified in the warning and non-conformity report.

Verra reviews and assesses whether the validation/verification body's root cause analysis and corrective action plan are satisfactory or if additional sanctions may be applied.

Accreditation Body Referral

Verra may share the results of its validation/verification body non-conformity reports with relevant accreditation bodies.

Suspension and Reinstatement

Verra may issue a notice of validation/verification body suspension at any time. Where a suspension notice is issued, Verra provides the validation/verification body with a copy or detailed description of the evidence upon which its decision was based. Suspension may be for the entire VCS Program, or the validation/verification body may be suspended for specific VCS sectoral scopes per the provisions set out in the *Verra VVB Agreement*.

The suspension is announced on the VCS website.

- 1) Where the full VCS program scope is suspended, the validation/verification body's approved status is changed to inactive.
- 2) Where specific scopes are suspended, the validation/verification body status remains active, but the suspended scope is changed from active to suspended.

A validation/verification body is automatically suspended where it is suspended by the VCS-approved GHG program or accreditation body under which it holds accreditation.

Inactive validation/verification bodies or active validation/verification bodies with specific suspended scopes are not permitted to conduct validation or verification audits or issue any documentation (e.g., validation/verification reports) concerning the suspended (inactive) program or specific scope(s) without Verra's prior and explicit approval.

A sectoral scope may be reactivated and/or VCS Program approval status reinstated where:

- 1) The validation/verification body demonstrates to Verra's reasonable satisfaction that:
 - a) The evidence upon which such suspension was based was inaccurate or misleading, or
 - b) The facts or circumstances leading to such suspension are no longer current or likely to affect the validation/verification body's performance, or
 - c) Its suspension by a VCS-approved GHG program or accreditation body under which it holds accreditation is lifted, and
- 2) The validation/verification body has paid all validation/verification body program and reinstatement assessment fees.

Background:

Verra is incorporating the most recent VCS Program updates regarding VVB sanctions into the Plastic Program to enhance program integrity and consistency across Verra program rules and requirements.

Correction 3: Updated timeframe required for VVBs to respond to Verra's findings in the PRR

Document and section reference: *Plastic Program Guide, v1.0, Section 5.7.11(6)*

5.7.11 Where material non-conformances are identified during the accuracy review (see the *Plastic Standard* for further details on the threshold for materiality), the validation/verification body shall respond to the findings issued (e.g., corrective action requests and clarification requests) by Verra, in accordance with the following procedure:

...

- 6) Where no response is received from the validation/verification body within 60 **business** days from the date on which findings were issued, Verra reserves the right to assume that the project proponent does not intend to pursue the project registration and/or verification approval request...

Background:

Verra is incorporating the most recent VCS Program updates regarding VVB response timelines into the Plastic Program for consistency across Verra program rules and requirements.

Correction 4/Clarification 1: Corrected project validation deadline and clarified project start date

Document and section references: *Plastic Waste Reduction Standard, v1.0, Sections 3.5.1 and 3.5.2*

3.5.1 The project start date shall be on or after 1 January 2016.

3.5.2 Projects with a project start date on or before 31 December 2021 shall complete validation by **30 June 2024**.

Background:

Verra is updating the Plastic Program rules and requirements consistent with the following announcements published in 2023:

- [Verra Extends Validation Deadline for Plastic Projects](#) (September)
 - Verra extended the validation deadline from December 31, 2023, to June 30, 2024, for projects with start dates between January 1, 2016, and December 31, 2021.
 - Verra will not grant any further extensions to this deadline.
- [Listing Request Deadline for Plastic Projects](#) (December)
 - As of February 1, 2024, Verra no longer accepts new listing requests from projects with start dates between January 1, 2016, and December 31, 2021.
 - Projects with start dates between January 1, 2016, and December 31, 2021, that are already registered or complete validation and request registration before June 30, 2024, are still eligible to participate in the Plastic Program.
 - Verra will not grant any extensions to this deadline.