



# SUMMARY OF COMMENTS AND VERRA RESPONSES: PUBLIC CONSULTATION ON VCS PROGRAM METHODOLOGY DEVELOPMENT AND REVIEW PROCESS

June 18, 2025

## 1 INTRODUCTION

This document summarizes the feedback from comments received during the [December 18, 2024 – January 31, 2025](#), public consultation on the proposed updates to the Methodology Development and Review Process (MDRP). The MDRP sets out procedures and rules for the development and review of new and existing methodologies in the [Verified Carbon Standard \(VCS\) Program](#).

During the consultation, Verra invited stakeholders to provide feedback on the following key updates:

- Shift from third-party to Verra-led methodology development
- Introduction of the Methodology Development Sponsorship Fund (MDSF)
- Shift from assessment by a validation/verification body (VVB) to review by a group of technical subject matter experts
- Formalization of periodic reviews of methodology idea notes

In this consultation, Verra received 28 comments from 6 stakeholders. We sincerely thank all stakeholders for their thorough and thoughtful feedback on each question.

Verra analyzed the feedback received and, where appropriate, incorporated feedback into the updated *Methodology Development and Review Process, v5.0*, summarized in the sections below.

## 2 COMMENTS RECEIVED AND VERRA RESPONSES

1. Do you have any other suggestions on how external parties could make more impactful contributions throughout the methodology development process?

#	Name	Organization	Country	Comment	Verra Response
1	David Schurman	Perennial	United States	<p>I am in favor of the Verra-led methodology development and revision approach, however I believe there need to be more involvement opportunities retained of 3rd-parties. Ultimately, having no pathway for 3rd parties to propose and develop methodologies may stifle innovation due to the extreme degree of expertise required to even devise some of these new helpful methodologies and revisions. I do not believe the submission of idea notes is sufficient. Some of these innovative methodologies will need to be developed by 3rd parties and their teams of experts. I suggest proceeding with the proposed Verra-led approach while still retaining a pathway for 3rd party development.</p>	<p>Verra has redefined how third parties can contribute during methodology development, see Section 2.1.1 of the <i>Methodology Development and Review Process, v5.0</i>. Experienced third parties will be invited to support Verra as Technical Contributors, either as paid consultants or to provide in-kind support. Depending on their level of expertise and availability, Technical Contributors may be asked to draft content for new methodologies and revisions.</p>
2	Maggie Lund	3Degrees	United States	<p>3Degrees appreciates Verra's attempts to reduce conflicts of interest in methodology development. We also recognize challenges with the current system, including that authors may draft methodologies in a way that limits the scope of their applicability by only allowing for certain approaches or technologies.</p> <p>However, we're concerned that Verra's MRDP proposal will add barriers to the methodology development process and significantly limit the participation of expert third-parties. Our specific concerns and recommendations include:</p>	<p>Verra has redefined how third parties can contribute during methodology development, see Section 2.1.1 of the <i>Methodology Development and Review Process, v5.0</i>. Experienced third parties will be invited to support Verra as Technical Contributors, either as paid consultants or to provide in-kind support. Depending on their level of expertise and availability, Technical Contributors may be asked to draft content for new methodologies and revisions.</p> <p>Regarding participation in working groups: Working groups are not mandatory and may be established by Verra during methodology development, where appropriate.</p>

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#	Name	Organization	Country	Comment	Verra Response
				<p>-(1) Lack of clarity around participation in working groups and expert panels. We urge Verra to provide more information about how third-parties can engage through this new process, including clarifying which types of entities are eligible to participate in each group and what participation entails. It is unclear whether individuals in the methodology WGs would be drafting text, and whether developers could sit on methodology WGs and/or expert panels when qualified. It is also unclear whether there will be limitations to listing a project against a protocol if you were part of the expert panel or working group.</p>	<p>Regarding whether individuals may participate in a working group and act as an independent expert: Individuals will either be selected to participate as a Technical Contributor or an Independent Expert Reviewer, but not both.</p> <p>Regarding an individual participating during methodology development and potential limitations to listing projects using the methodology: Verra recognizes that most parties interested in collaborating during methodology development are also interested in future project development. Verra manages all potential conflicts of interest that may arise during methodology development, see Section 2.2 of the <i>Methodology Development and Review Process, v5.0</i>.</p>
3	Maggie Lund	3Degrees	United States	<p>-(2) Delays and extended timelines. The new MRDP is likely to extend the (already lengthy) methodology development process. We anticipate that recruiting an expert panel, coordinating with working groups, and drafting protocols with a broader scope is likely to lead to delays. We encourage Verra to prioritize keeping this process as efficient as possible, as extended methodology development can delay much-needed climate action.</p>	<p>The <i>Methodology Development and Review Process, v5.0</i> has been designed to improve process efficiencies and shorten development timelines.</p> <p>Regarding recruiting an expert panel: Verra will issue a Call for Interest earlier in the process (during the MIN stage) to start the expert selection process as soon as reasonable.</p> <p>Regarding coordinating with working groups: Working groups are not mandatory and may be established by Verra during methodology development, where appropriate.</p> <p>Regarding drafting protocols with a broader scope that may lead to delays: Broad applicability is one of the criteria used to assess the priority of a proposal for methodology development outlined in Section 3.1.11 of the <i>Methodology</i></p>

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					<i>Development and Review Process, v5.0.</i> Verra strives to have methodologies that broadly apply to a large number of projects instead of developing similar methodologies, with potential for overlapping scope and gaming. Also, it takes more resources in the long term to maintain a longer list of methodologies.
4	Maggie Lund	3Degrees	United States	- (3) Exclusion of project developers. Verra should consider allowing for greater participation/input from developers and project owners, particularly when developing methodologies for nascent or first-of-its-kind projects or technologies. In many cases, the project developers driving the methodology development are the experts in these project types. We encourage Verra to engage VVBs or other VCS project developers with significant sectoral expertise and project implementation experience to serve as experts during the methodology development process.	<p>Verra has redefined how third parties can contribute during methodology development, see Section 2.1.1 of the <i>Methodology Development and Review Process, v5.0.</i></p> <p>Verra has not excluded project developers from participating formally as funders, technical contributors, or informally as general stakeholders.</p>
5	Jamie Rogers	CarbonCure	United States	Project developers can provide valuable relevant expertise on tech capabilities and business impacts of methodologies, especially with respect to amendments to existing methodologies. They should have opportunities to submit suggested text early in the drafting process.	<p>Verra has redefined how third parties can contribute during methodology development, see Section 2.1.1 of the <i>Methodology Development and Review Process, v5.0.</i></p> <p>Project developers will be encouraged to participate throughout the process as funders, technical contributors, independent expert reviewers, or informally as general stakeholders (e.g., participate during public consultation).</p>
6	Anonymous #1	N/A	N/A	It is not always easy for external parties to spend time on methodology reviews, the improved system of online forms	Verra has added a new requirement to publish a quantification spreadsheet along with the draft

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				helps though. What is missing from the new methodology process is a transparent testing procedure, what happens if you apply the new methodology to existing projects or if it is a completely new methodology then run it through some potential real life scenarios. Here you can ask project developers to contribute. Consider paying people for their time to do this.	<p>methodology, module or tool during the public stakeholder consultation, see Section 3.3.1 of the <i>Methodology Development and Review Process, v5.0</i>. Stakeholders will be encouraged to use the quantification spreadsheets to test the new methodology, module, tool, or revision using real-life data and scenarios.</p> <p>Regarding paying people for their time to do this: Thank you for your suggestion. Verra will consider this for future updates.</p>
7	Lynn Riley	American Forest Foundation	United States	<p>As a party who has developed methodologies and methodology revisions with Verra in the past, we have also found it to be most efficient and effective where Verra has led and managed the process. We are supportive of this shift. Our primary comment would be to consider how this shift will impact the timeliness of methodology development, given that a greater lift of capacity may fall to Verra than when methodologies were third-party led. Given how quickly the market and innovations are moving (and must continue to move), we hope Verra will maintain the capacity to take this on with the new shift. An idea for how external parties could make more impactful contributions (in addition to submitting MINs, demonstrating demand and needs, providing technical expertise, and providing funding) would be as testers or providers of test data upon which to test new methods prior to their release. American Forest Foundation is happy to support in this aspect where applicable.</p>	<p>The <i>Methodology Development and Review Process, v5.0</i> has been designed to improve process efficiencies and shorten development timelines. Verra focuses available resources on the highest priority work, which is determined based on the criteria outlined in see Section 3.1.11 of the <i>Methodology Development and Review Process, v5.0</i>. Verra is committed to learning, adapting and updating this process in response to evolving market conditions.</p> <p>Thank you for your continued support with providing technical expertise and testing new methods prior to their release. Verra has added a new requirement to publish a quantification spreadsheet along with the draft methodology, module or tool during the public stakeholder consultation, see Section 3.3.1 of the <i>Methodology Development and Review Process, v5.0</i>.</p>

2. Do you think there are any risks associated with Verra accepting funding for methodology development from external parties? If yes, how could Verra mitigate and reduce these risks?

#	Name	Organization	Country	Comment	Verra Response
1	David Schurman	Perennial	United States	I think funding for methodology development is an excellent idea. As long as methodologies are still reviewed by independent experts and undergo public comment, I do not see major risks.	Thank you for your comment.
2	Maggie Lund	3Degrees	United States	<p>Yes, there are significant risks with this approach. If Verra allows private entities to fund methodology development and then prioritizes methodologies with the most funding, this indirectly allows the wealthiest interests and stakeholders to dictate Verra’s agenda. This type of “pay to play” system could easily be at odds with prioritizing the methodologies with the greatest potential to mitigate climate change or with the greatest need for carbon market funding to be viable. For example, it’s entirely possible that the most high-impact or scalable project types may not be those with the greatest external funding. In fact, a pipeline of projects that require carbon funding (and are therefore highly additional) are unlikely to have additional revenue to put towards funding a protocol. Requiring developers and project operators to lobby &amp; donate for their methodology to reach the top of Verra’s authorship queue will leave cost-constrained, highly additional projects stranded.</p> <p>To mitigate these risks, Verra could consider capping contributions unless or until a given entity meets a set of criteria, such as active participation in working groups, in-kind labor toward the methodology development, or</p>	<p>Verra assesses proposals for methodology development (methodology idea notes) and determines the priority based on the criteria outlined in Section 3.1.11 of the <i>Methodology Development and Review Process, v5.0</i>. After an opportunity has been flagged as a priority to proceed, Verra will consider whether sufficient funding (both external and internal) is available. Priorities are not primarily determined by external funding,</p> <p>Verra has redefined how third parties can contribute during methodology development, see Section 2.1.1 of the <i>Methodology Development and Review Process, v5.0</i>. Smaller organizations and project developers will be encouraged to participate throughout the process. Since Verra will lead the process rather than a third-party developer, this will encourage broader engagement and collaboration and make it easier for smaller entities to contribute meaningfully.</p>

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				demonstrating project development through new project listings. This would encourage participation from smaller organizations and project developers, who generally prefer a third-party-led process due to the ability to contribute through in-kind labor rather than direct financial sponsorship. Alternatively, Verra could commit to developing a minimum number of different types of protocols to ensure a more equal distribution of time and funding across various types of projects.	
3	Jamie Rogers	CarbonCure	United States	Yes, there is always a risk of perceived bias, but this can be mitigated through proper governance of both the funding mechanism and methodology development apparatus.	Thank you for your comment.
4	Lynn Riley	American Forest Foundation	United States	<p>It seems that Verra must accept funding from external parties to support methodology development. Therefore, the risks associate with this should be managed through safeguards, but should not be seen as prohibitive to Verra securing external funding for this important work.</p> <p>Risks to be managed could include:</p> <ul style="list-style-type: none"> <li>- A clearly important methodological innovation is proposed, but is without clear funding. This decreases its prioritization despite its high importance or urgency for the market.</li> <li>- Stakeholders able to fund methodology development have a leg up on their ideas being prioritized over others, which could lead to</li> </ul>	<p>To mitigate risks associated with receiving funding in the form of grants for methodology development work, Verra has included key provisions and safeguards (see Section 2.3 of the <i>Methodology Development and Review Process</i>, v5.0).</p> <p>Verra assesses proposals for methodology development (methodology idea notes) and determines the priority based on the criteria outlined in Section 3.1.11 of the <i>Methodology Development and Review Process</i>, v5.0. After an opportunity has been flagged as a high priority to proceed, Verra will consider whether sufficient funding (both external and internal) is available. Where external funding is unavailable for a high priority development, Verra will cover</p>

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				<p>inequitable prioritization of methodology development.</p> <p>We would recommend Verra consult with other similar processes (and possibly lawyers) to minimize such risks for inequity or conflicts of interest, building in clear safeguards into the funding process.</p>	<p>the costs if possible. If sufficient funding is not available, Verra may be required to put the development on hold until sufficient resources are available. Priorities are not primarily determined by external funding.</p> <p>Regarding the suggestion to consult with similar processes or lawyers: Thank you for the suggestion. Verra's internal legal counsel drafted the terms for funding outlined in Section 2.3 of the <i>Methodology Development and Review Process, v5.0</i>.</p>

3. Do you have an alternative proposal or approach for how VCS methodology development could be funded?

#	Name	Organization	Country	Comment	Verra Response
1	Maggie Lund	3Degrees	United States	<p>Yes, we propose two alternative approaches for Verra's methodology development and funding process:</p> <p>#1) Integrate the old and new methodology development processes. Verra could implement the following process:</p> <ul style="list-style-type: none"> <li>- (1) Verra goes through the MIN review process and selects which methodologies to prioritize,</li> <li>- (2) third-party developers lead authorship and self-fund with input from Verra and WGs,</li> <li>- (3) have an expert panel and any WG members review the methodology, rather than a VVB paid for by the developers.</li> </ul>	<p>Thank you for your comments and for proposing alternative solutions.</p> <p>Regarding #1): Recent experience has demonstrated that Verra is best suited to lead the authorship while allowing experienced stakeholders to contribute their expertise.</p> <p>Regarding #2): Stakeholders are encouraged to support Verra's broader mission and provide an unrestricted donation.</p>

### 3. Do you have an alternative proposal or approach for how VCS methodology development could be funded?

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				<p>#2) Establish alternative funding structures for methodology development. Instead of a methodology-specific fund, Verra could establish a universal fund that pays for all methodology development.</p> <p>#3) Alternatively, individual methodology development could be funded through the future proceeds of a small portion of issuance fees from that methodology. For example, a new methodology requires an additional 3 cents per VCU in issuance fees for a limited duration that is used to pay back into the fund. This approach might require some initial capital raise or even a bank loan to generate the initial funds.</p>	<p>Regarding #3): Thank you for the suggestion. At this time, Verra has decided not to proceed with this approach for the following reasons:</p> <ul style="list-style-type: none"> <li>- Early users (first projects) of the methodology will be at a disadvantage compared to others that can afford to wait to use the methodology.</li> <li>- There is added complexity and cost associated with administering a new fund and adjusting issuance fees.</li> <li>- Verra would be required to continue covering the upfront costs associated with methodology development.</li> </ul>
2	Anonymous #1	N/A	N/A	<p>Keep the current system open where external parties can develop methodologies. Make sure to act though on problems identified with methodologies. Provide online calculators and templates to support GHG accounting and charge project developers a fee to use them.</p>	<p>Thank you for your suggestions.</p> <p>Recent experience has demonstrated that Verra is well-positioned to lead the methodology development process due to its role in establishing and maintaining the overarching rules for the VCS Program. Verra-led development processes have also proven to be more efficient than those led by third parties.</p> <p>Regarding online calculators and templates: Verra has added a new requirement to publish a quantification spreadsheet along with the draft methodology, module or tool during the public stakeholder consultation, see Section 3.3.1 of the <i>Methodology Development and Review Process, v5.0</i>.</p>

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3	Lynn Riley	American Forest Foundation	United States	<p>It seems that innovation-based philanthropy would be a good opportunity for funding methodology development; in fact, this is how American Forest Foundation has funded some of its own methodology development work when it has led. Verra could invest in philanthropy team members to secure such funding.</p> <p>We also wonder if market groups may be interested in funding methodology development in a grouped sense. Would a buyer coalition, for example, with a value of high-integrity carbon credits be willing to regularly contribute to Verra's general methodology development fund, knowing it will result in greater integrity for the credits available in the market? In that way, funding could be secured in advance of even a specific MIN being proposed.</p> <p>Additionally, it seems that this new development process will eliminate the fee external methodology developers could optionally receive (which we support). This may be an additional source of revenue for Verra relative to past methodology fees.</p>	<p>Regarding innovation-based philanthropy: Thank you for your suggestion, this is underway. Verra has a Fundraising Manager on staff who is actively promoting funding methodology development. For more details see Verra's webpage.</p> <p>Regarding funding methodology development in a grouped sense: Thank you for your suggestion. Verra will consider formalizing this for future updates and improvements. At this time, Verra is encouraging stakeholders to collaborate and share the costs related to methodology development.</p> <p>Regarding the methodology compensation fee: Thank you for your comment. The compensation for methodology developers has been phased out as of 31 December 2025, see Section 7.3 of the <i>VCS Program Guide, v4.4</i>.</p>

4. Do you think the proposed shift to expert reviews will maintain or improve the rigor of the assessment process? If not, what additional measures do you suggest to improve rigor while balancing efficiency and timelines?

#	Name	Organization	Country	Comment	Verra Response
1	David Schurman	Perennial	United States	Yes, I believe a shift to expert reviewers will greatly improve the rigor of the assessment. As someone who was directly involved with this new process, I witnessed firsthand the level of additional rigor that true experts in a subject matter bring. VVBs simply cannot be expected to retain the expertise needed for some of these novel methodology concepts.	Thank you for your comment.
2	Jamie Rogers	CarbonCure	United States	Yes, we support this approach, but there should be a fulsome opportunity for project developers to provide their insights and respond to expert comment and questions, especially given that project developers often have the most expertise related to the practical application of a methodology.	<p>Thank you for your comment.</p> <p>Verra has redefined how third-parties can contribute during methodology development, see Section 2.1.1 of the <i>Methodology Development and Review Process, v5.0</i>.</p> <p>Project developers will be encouraged to participate throughout the process as funders, technical contributors, independent expert reviewers, or informally as general stakeholders (participate during public consultation, etc).</p>
3	Anonymous #1	N/A	N/A	VVBs should not be removed from the process. It is unrealistic to expect that a panel of experts in a specific field will have the in depth knowledge of what the requirements of validation and verification are. Experts can end up proposing complex methodologies that are not verifiable. Many scientists simply do not understand the rigor required for successful carbon credit verification. Scientific publications contain volumes of speculation and theorising and many conclusions are made on dubious data, this does not belong in GHG methodologies.	<p>Thank you for your comment.</p> <p>VVBs have not been entirely removed from the process (see Section 3.3.4 of the <i>Methodology Development and Review Process, v5.0</i>. In some cases, VVBs may participate as of the experts selected to form a balanced and diverse group.</p>

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#	Name	Organization	Country	Comment	Verra Response
4	Lynn Riley	American Forest Foundation	United States	We are supportive of this shift, and see expert review better aligning where the expertise lies with who is reviewing new methodologies. For that reason, we suspect this will both improve the rigor and efficiency of the process. VVBs would be better able to focus on their core capabilities, which may not include, for example, deep and specific statistical expertise for a new, innovative method being proposed.	Thank you for your comment.

5. What qualifications, expertise, and other criteria should Verra consider when hiring experts to ensure a robust and credible review?

#	Name	Organization	Country	Comment	Verra Response
1	David Schurman	Perennial	United States	<p>1) Conflict of interest. Experts should be required to attest to any conflicts of interest or lack thereof.</p> <p>2) Relevant expertise as demonstrated by industry involvement, academic publications, or other means.</p> <p>3) Diversity of organization. Ideally, a mix of academic and industry/NGO participants should be included. If all academics are selected, the methodology will likely have an overly-academic approach and they miss key aspects of real-world applicability, for example.</p> <p>4) Time availability. Ensure that participants will be able to devote the time that a quality review demands.</p>	<p>Thank you for your comment. Verra has incorporated your suggestions into the expert selection process (see Section 3.3.3 and 3.3.4 of the <i>Methodology Development and Review Process</i>, v5.0).</p> <p>Regarding collaboration: The independent expert reviewers may review the methodology independently from each other and each produce an Expert Review Report. They are not required to collaborate with each other. Verra incorporates relevant feedback from each expert into the final methodology.</p>

5. What qualifications, expertise, and other criteria should Verra consider when hiring experts to ensure a robust and credible review?

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				5) Collaboration. Members should be selected who are collaborative in nature and who are open to differing opinions. Members who presuppose that there is one correct way to do something will likely slow down the process and lead to a less effective result.	
2	Maggie Lund	3Degrees	United States	We encourage Verra to recruit a diverse set of experts from academia, as well as the public and private sectors. We also encourage Verra to be transparent about their selection of experts, what criteria was applied, and whether positions are volunteer or paid opportunities.	Thank you for your suggestions. Verra has incorporated them into the expert selection process (see Sections 3.3.3 and 3.3.4 of the <i>Methodology Development and Review Process, v5.0</i> ).
3	Jamie Rogers	CarbonCure	United States	The expert body should include not only academic experts but those with relevant in-field or business experience.	Thank you for your suggestions. Verra has incorporated them into the expert selection process (see Sections 3.3.3 and 3.3.4 of the <i>Methodology Development and Review Process, v5.0</i> ).
4	Anonymous #1	N/A	N/A	Consider adding project developers to the review and other than expertise in the appropriate field prioritise selecting experts with industry experience over theoretical practitioners.	Thank you for your suggestions. Verra has incorporated them into the expert selection process (see Sections 3.3.3 and 3.3.4 of the <i>Methodology Development and Review Process, v5.0</i> ).
5	Lynn Riley	American Forest Foundation	United States	<p>We would recommend that Verra vet a pool of experts ahead of when a need arises, to be called upon when a need does arise. This would be similar to ICVCM's approach to experts. That way, the process of finding experts does not delay their review taking place.</p> <p>We would encourage diverse expertise to be involved in any review. For example, including two academics without</p>	<p>Thank you for your suggestions.</p> <p>Regarding your suggestion to encourage diverse expertise: Verra has incorporated this into the expert selection process (see Sections 3.3.3 and 3.3.4 of the <i>Methodology Development and Review Process, v5.0</i>).</p> <p>Regarding your suggestion to convene a pool of experts: At this time, Verra plans to search for qualified experts with</p>

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				including practitioners among experts on a review could lead to infeasible results. Or, including only people focused on a specific geography, when the methodology must be applied globally, could result in unanticipated shortcomings. This may mean that more than two experts are required for the review.	specific expertise, depending on the subject matter. We will consider this for future updates or improvements to the process.

### 6. Are there any other changes or improvements to the MIN submission and review process that Verra should consider? What are these?

#	Name	Organization	Country	Comment	Verra Response
1	David Schurman	Perennial	United States	I would suggest that perhaps there should be an option for an expedited or out-of-cycle MIN review for an associated fee. While it may seem that this could encourage "pay to play" behavior and deprioritize MINs from constituents who aren't able to afford the fee, in reality I would suggest that an expedited option could encourage greater participation from organizations who cannot wait for a full review cycle. An expedited review simply means an expedited decision of whether or not to pursue an MIN and does not mean that these ultimate methodologies will get more attention from Verra.	<p>Thank you for your suggestion. Please see Section 3.1.10 of the <i>Methodology Development and Review Process, v5.0</i>) for the updated process.</p> <p>Stakeholders are encouraged to submit MINs at any time. Upon receipt, Verra will conduct a completeness review and determine whether to proceed to a full MIN review as an Out-of-cycle MIN or to wait until after the next MIN submission deadline. This decision is based on a preliminary analysis of the expected priority as well as staff availability. Priority is determined based on the criteria outlined in Section 3.1.11 of the <i>Methodology Development and Review Process, v5.0</i>).</p>
2	Maggie Lund	3Degrees	United States	Yes. As noted above, 3Degrees' recommendation is to remove funding from the list of metrics used to prioritize methodology review and development given the unequal	Thank you for your comment. Verra assesses proposals for methodology development (methodology idea notes) and determines the priority based on the criteria outlined in

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				<p>“pay to play” system such a funding structure could create. Additionally, with the potentially competing nature of the metrics used to prioritize MINs, Verra should clarify and expand on how these metrics will rank against each other when they aren’t aligned. For example, how will “potential to mitigate climate change” and “potential to mitigate risk” be measured and compared across different project types? More importantly, how will methodologies with significant funding but limited potential impact be prioritized against minimally-funded methodologies that are widely applicable and can drive innovation?</p> <p>To add transparency to this process, we recommend that Verra publish its justifications for prioritization of MINs and allow feedback from stakeholders during and/or after the MIN review cycle.</p> <p>We also encourage Verra to solicit stakeholder feedback before cancelling active protocols and then requiring new MINs for reactivation - i.e. VMR0003 and VM0022 and AMS0065. Most of these protocols were cancelled without a public consultation, with stakeholders experiencing significant barriers when attempting to open a new MIN to reactivate the protocols.</p>	<p>Section 3.1.11 of the <i>Methodology Development and Review Process, v5.0</i>. After an opportunity has been flagged as a high priority to proceed, Verra will consider whether sufficient funding (both external and internal) is available. Priorities are not primarily determined by external funding,</p> <p>Regarding the prioritization metrics: Verra uses an internal framework to assess the value and risk of all proposed methodology developments and to assign a priority compared to other ongoing initiatives.</p> <p>Regarding the process to inactivate methodologies: Verra has an obligation to maintain the integrity of the VCS Program, which includes a requirement to review and update methodologies once every five years. Verra does not have the resources available to maintain methodologies that are not widely used, and resources are focused on initiatives that align with Verra’s mission to scale the VCS program to maximize impact.</p>
3	Anonymous #1	N/A	N/A	No experience with MIN	Thank you for your comment.

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4	Lynn Riley	American Forest Foundation	United States	<p>In addition to the proposed prioritization criteria, we would suggest:</p> <ul style="list-style-type: none"> <li>- Alignment with evolving regulatory body principles, such as CCP.</li> <li>- Ability to enhance the adherence of existing methodologies to Verra's principles and values (for example, a methodology revision that enables better accuracy).</li> <li>- Allowing stakeholders to weigh in on prioritization, through the public consultation of the MIN</li> </ul>	<p>Thank you for your suggestions.</p> <p>Regarding alignment with evolving regulatory body principles: Verra tracks the existing and evolving frameworks and strives to align with all principles that are relevant to the VCS Program. Principles such as the ICVCM CCPs are followed by the VCS Program and reflected in its methodologies, as indicated by ICVCM approvals.</p> <p>Regarding enhancing adherence to Verra's principles and values: Verra is committed to improving methodologies to reflect updated science, technological development and best practices.</p> <p>Regarding stakeholder consultation on prioritization of MINs: Verra uses an internal framework to assess the value and risk of all proposed methodology developments and to assign a priority compared to other on-going initiatives.</p>

### 1. General Feedback

#	Name	Organization	Country	Comment	Verra Response
1	David Schurman	Perennial	United States	I applaud Verra's efforts to streamline the MDRP. It is in great need of improved efficiency. Further improvements could be made by digitizing the MDRP process, i.e. instead of submitting PDFs for MINs and other proposals, users could accomplish	Thank you for your suggestion. Verra is considering this for future updates to the process.

1. General Feedback					
#	Name	Organization	Country	Comment	Verra Response
				this through a web-based form or platform. In addition, the use of LLMs could be used to streamline Verra's assessments of key details by summarizing submitted materials, highlighting key details, and providing context on niche areas of expertise required to assess new proposals. Furthermore, this would allow for a live status to be displayed internally or externally of every submitted and in-progress methodology.	
2	Maggie Lund	3Degrees	United States	We're concerned that bringing methodology development in-house will significantly add to Verra's already saturated workload. While we understand that substantial time is spent going back and forth with third-party developers during the existing methodology development process, methodology authorship is extremely time and labor-intensive. Given existing delays with project reviews, we encourage Verra to continue to prioritize efficiency improvements as it works to develop a new MRDP.	Thank you for your comments. Recent experience has demonstrated that Verra is well-positioned to lead the methodology development process due to its role in establishing and maintaining the overarching rules for the VCS Program. Verra-led development processes have also proven to be more efficient than those led by third parties.
3	Philipp Andres	Perimeter Forest Limited Partnership	Canada	Perimeter Forest acknowledges that a high-fidelity MDRP is the cornerstone of the VCS Program's eligibility under CORSIA and the ICVCM CCP Assessment Framework. However, a more agile methodology maintenance process is required to enable the use of Mitigation Outcome Labels and ensure the VCS Program maintains compatibility with the evolving expectations of corporate offtakers and market integrity initiatives. Efficiently operationalizing the use of Mitigation Outcome Labels at a Program level will increase the demand and competitiveness of VCS projects. At present, many VCS methodologies cannot easily access labels, as the required changes are classified as a Major Revision under MDRP v4.4.	Thank you for your comments.  Regarding whether revisions to enable Mitigation Outcome Labels should be major or minor revisions: The difference between a major and minor revision is defined in Section 2.5.2 of the <i>Methodology Development and Review Process</i> , v5.0. Depending on the extent of the revisions required to update equations to allow the calculation of net GHG reduction and CO2 removal, Verra determines whether each revision should qualify as major or minor. In some cases, the revisions are considered major because the revision requires significant changes to the methodologies content or approach. Recent revisions ( <a href="#">VM0045, v1.1</a> and <a href="#">VM0043</a> ,

1. General Feedback					
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				<p>- Proposed changes for the MDRP v4.4: Where published Methodologies already require the calculation of net GHG reduction and CO2 removal—the inclusion of equations for Mitigation Outcome Labelling purposes should be defined as a Minor Revision.</p> <p>Perimeter Forest proposes Verra extends the Tentative Timeline (Section 1.1) on the current public comment period to allow for adequate consultation on an expanded mandate for Minor Revisions—to efficiently enable the implementation of Mitigation Outcome Labelling in Methodologies that already require the calculation of net GHG reduction and CO2 removal.</p> <p>- Perimeter Forest is in support of introducing a Methodology Development Sponsorship Fund for new methodologies and Major Revisions, provided the costs are shared equitably by the respective methodology stakeholders. For clarity, Minor Revisions should still be funded by Verra's existing business model."</p>	<p><a href="#">v1.1</a>) that updated equations to enable Mitigation Outcome Labels and were considered minor revisions.</p> <p>Regarding extending the timeline on the public consultation of this update: Thank you for the suggestion. Verra has decided not to formalize this suggestion at this time.</p> <p>Regarding funding: The <i>Methodology Development and Review Process, v5.0</i> allows multiple stakeholders and Verra to share the costs of methodology development. Verra will continue to cover the cost of methodology development that is considered part of core operations and necessary to maintain high integrity methodologies. This means Verra will cover the cost for staff time for most minor revisions or to issue corrections and clarifications that do not require expert review.</p>