

# SUMMARY OF COMMENTS: JUNE 2023 PUBLIC CONSULTATION ON PROPOSED UPDATES TO THE VCS PROGRAM

Release Date: 22 August 2023

## Updates to the VCS Safeguard and Stakeholder Engagement Requirements

1. Does the new structure of Stakeholder Engagement and Safeguards sections make sense?				
Comment #	Name	Organization	Country	Comment
1	Lasse Leipola	Finnwatch	Finland	<p>As the projects in question are business operations, the section on safeguards should be based on established guidance on corporate human rights and environmental due diligence. The global authoritative standard on business and human rights is the UN Guiding Principles on Business and Human Rights (UNGPs). Due diligence and responsible business conduct are also further elaborated in the recently updated OECD Guidelines for Multinational Enterprises and in the OECD Due Diligence Guidance for Responsible Business Conduct.</p> <p>According to the above mentioned international standards, the corporate responsibility to respect human rights refers to internationally recognised human rights, understood at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Accordingly, the reference to ratification by the host country should be deleted in paragraph 3.18.11, and a reference to ILO Declaration added. Alternatively, this paragraph could also simply refer to "internationally recognised human rights".</p> <p>One way of referencing to the UNGPs can be found in the Nordic Code of Best Practice for the Voluntary Use of Carbon Credits by the Nordic Dialogue:</p> <p>"Organisations conducting mitigation activities shall institute a policy commitment to meet the responsibility to respect human rights. They shall also conduct human rights due diligence and proactively manage potential and actual adverse human rights impacts with which they are involved in line with UN Guiding Principles. Where an organisation identifies that it has caused or contributed to actual adverse human rights impacts, it needs to address such impacts by providing for or cooperating in their remediation. Organisations shall have the ex-ante assessment and ex-post monitoring and reporting verified by a competent third-party entity."</p> <p>UNGPs: <a href="https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights">https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights</a></p> <p>ILO: <a href="https://www.ilo.org/declaration/lang-en/index.htm">https://www.ilo.org/declaration/lang-en/index.htm</a></p> <p>OECD Guidelines: <a href="https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm">https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm</a> and <a href="http://mneguidelines.oecd.org/mneguidelines/">http://mneguidelines.oecd.org/mneguidelines/</a></p> <p>Nordic Dialogue: <a href="https://www.norden.org/en/publication/harnessing-voluntary-carbon-markets-climate-ambition">https://www.norden.org/en/publication/harnessing-voluntary-carbon-markets-climate-ambition</a></p>
2	Livio Pierro	Face the Future	Netherlands	Does make sense. The added information does not conflict with what was present before. On the contrary this information adds value and complements the existing requirements.
3	Eric Wilburn	NatureBridge	USA	Yes
4	ANONYMOUS #4	N/A	N/A	Overall yes
5	ANONYMOUS #5	N/A	N/A	<p>Yes. SDGs: Noting that for SDG contributions those using CCB or SDV to do this should still be required to cross reference their SDG contributions to specific, named goals and targets.</p> <p>Section 3.18.16: this section has unnecessary redundancies of stating no harm to biodiversity and ecosystems and then singles out RTE species. The latter can have the affect of PDs then just focusing on those when the first part is inclusive.</p> <p>Section 3.18.17 (1) is confusing--what is meant by allowing invasive species to thrive? Does that mean pre-existing invasives must be managed or you can still introduce spp that may be invasive but OK if you manage them? A requirement to eradicate all invasives that were already there could likely make many projects infeasible though it would be laudable. I don't think Verra should allow any species that can become invasive. Eucalyptus is a great example--PDs saying they'll manage it means forever and any activity that must be implemented forever is automatically financially infeasible.</p>
6	ANONYMOUS #6	N/A	N/A	Will there be any limits or filters for the new Section 3.19.12? Verra staff should filter all comments and require response from the PD only when deemed necessary. In addition, the timing of the comment should be considered in any requirements for updates to project design (e.g., if the comment arrives during verification, it should be addressed at the subsequent verification).

7 ANONYMOUS #7	N/A	N/A	Yes, it is easy to understand
8 ANONYMOUS #8	N/A	N/A	I think the structure of both sections make sense. Although I believe the stakeholder engagement and safeguards section needed to be strengthen, one concern that I have is that the new requirements are a bit too vague. For example, in section 3.18.7 (identify risk related to safety of women and girls), it is unclear if this is related to project activities or overall, what does safety mean, how is this demonstrated, how is this verified, etc. I think either the language has to be more specific or additional guidance will need to be provided. What I have seen in the past is that project proponents simply narrate how they are complying with the safeguards, without any proof, but if the requirements are vague, it would be hard to know what is required.
9 ANONYMOUS #9	N/A	N/A	The concepts of "Stakeholder Engagement" and "Safeguards" need to be modified. See the answers to question 3 below.
10 ANONYMOUS #10	N/A	N/A	Yes
11 Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	<p>3.19.2. Conducting local stakeholder consultation before project implementation begins creates a timeline that could be unworkable in some settings.</p> <p>Notably, if a project is being developed in response to a new methodology, there is a 4 year grandfathering period during which a project start date can be designed to commence. When the new methodology is published, there is no way in which a project could have possibly anticipated the required stakeholder consultation even whilst the project still has a valid claim (per other sections of the VCS Standard) to begin VCU issuance within 4 years of its validation date (provided this is within 2 years of the methodology approval date).</p> <p>As a result it more sensible and conforming with VCS' other Standard requirements to make the stakeholder consultation timeline requirement to take place prior to the project validation date.</p> <p>Similar concerns arose with the original proposed timeframe for VCS's scope 3 double claiming proposals, which were framed around project start date and incurred the same inconsistencies. These scope 3 standard updates are now being reframed to focus on the project validation date as the trigger timeline threshold. The stakeholder consultation requirement should adopt the same timeframe to avoid the very same problems – namely focus on the project validation date.</p> <p>Projects should also have reasonable, wide latitude when determining what the stakeholder consultation process should comprise, reflecting wide differences in the likely scope of any potential impacts and stakeholder compositions.</p>
12 Martin Camilo Perez Lara	NA	Colombia	<p>No, It is important to note that while the safeguards formulated by VERRA are a reference, they are insufficient to face the challenges of the voluntary market. Therefore, it should be aimed at:</p> <ul style="list-style-type: none"> <li>■ Implement optimal models for communities to distribute benefits, participate, and guarantee the relevant participation mechanism (Prior Consultation CPLI) and clarify public-private interaction to fulfill safeguards.</li> <li>■ Inclusion of clauses that allow the termination of contracts between communities and privates if they are not satisfactory for any parties due to non-compliance with what is established in the contracts.</li> <li>■ Inclusion of a conflict resolution system that recognizes the needs and characteristics of the communities where REDD+ projects are developed.</li> <li>■ Establishment of clear rules for the distribution of benefits approaching the investment conditions of the regulated financial system, that is, determining a maximum profitability rate for the project developer that has as a reference the profitability of financial products in force in the banking market. Likewise, the use of economic benefits is assigned to the community.</li> <li>■ Define that internal investment plans are developed in the communities before receiving the resources, as this has caused rupture and fragmentation of the communities.</li> <li>■ Establish mechanisms to have clarity of the origin of the resources that are invested in these projects.</li> <li>■ Disproportionality in capturing resources that stop being invested in the territory by technical intermediaries or developers. For example, the WWF Colombia about Fair Deals Guide (<a href="https://www.wwf.org.co/?379438/Tratos-justos-en-proyectos-REDD-Mas-para-la-gente">https://www.wwf.org.co/?379438/Tratos-justos-en-proyectos-REDD-Mas-para-la-gente</a>) recommends that, instead of establishing a system of benefit-sharing between communities and developers, the distribution of benefits is based on the transparency of the rate of return obtained by the developer, like the return on a bank financial product. This is considering that with the current system of benefit sharing, the relationship between the effective investment made by the developer and the return obtained is hidden. With 50/50 (or likely) percentage sharing schemes, for example, extraordinary returns can be generated for the developer, reaching values that far exceed the average rate of return-on-investment projects or the highest-risk financial assets available in the market, which is disproportionate and increases the overwhelming interest in formulating such projects. This increases pressure on communities and makes it difficult to comply with social and environmental safeguards. Additionally, there is no transparency, for example, about the taxation of the resources invested in these projects.</li> </ul>

13	Indradeep Das	ReNew	India	<p>It does. It reflects some of the 'sustainable development' principles as laid out in CCP of IC-VCM.</p> <p>On the Safeguards section: Lack of complete understanding of context-relevance of ecosystems protagonist of the project has potential to affect socio-economic status of communities due to land enclosure and resource access limitation. Asking to provide a clear socio-economic &amp; Human Rights impact assessment will help project's developers to better map-out trade-offs of the project and make an informed choice about the net-impact or socio-economic-impact the project can make. On the ecological side, distortion of native ecosystem and communities climate resilience has been identified as major problem. Hence, ruling them out will increase quality, reputation, and additionality of these projects.</p> <p>On the stakeholder engagement section: Driving the stakeholders consultation in a structured way as proposed would be productive for voluntary carbon credits and offsets.</p>
14	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	<p>First of all, we would like to thank Verra for the opportunity to respond to the proposed changes.</p> <p>GENERAL POINTS:</p> <p>CLARITY IN DEFINITIONS AND FOCUS ON OPERATIONALISATION OF GUIDELINES</p> <p>Our first point is a more general one. Since safeguards are such a critical component of project design and eligibility, we would recommend Verra to provide more guidance on how to operationalise these safeguards in practice. As we note below some of the concepts have very broad definitions and unless made very clear, it leads to a lot of uncertainty for both project developers and VVB's on how to interpret the guidance.</p> <p>ON THE SWITCH FROM "NATIVE ECOSYSTEMS" TO "EXISTING ECOSYSTEMS"</p> <p>One of the key issues in the new guidance that requires clarity is the switch from "native ecosystems" to "existing ecosystems". We think that Verra should instead change the wording to "natural, non-degraded ecosystems". It's currently unclear what Verra means by this change or if Verra potentially wishes to push through a paradigm shift in its approach. In case it is the latter we would like to highlight why that is undesirable:</p> <ul style="list-style-type: none"> <li>•On a macro level all the IPCC scenarios that aim to keep global temperature rise below 1.5-2 degrees require massive carbon removals through reforestation (210 GtCO<sub>2</sub> CDRs in AFOLU sectors). Without carbon certification of AFOLU CDR projects the world will not get there. We see it as Verra's role to facilitate such certification in the best way possible so the world can get towards the 210 GtCO<sub>2</sub> as quickly as possible.</li> <li>•Land use change studies in the areas where we develop projects (in Latin America / South East Asia) have shown significant deforestation in the past 50-100 years and will continue to do so unless innovative reforestation projects are stimulated through the certification of their carbon impact.</li> <li>•So what does Verra mean with "existing ecosystem"? If we have an ecosystem of mostly large grassland area, with low conservation value, that has been like that for the past 40 years but was 100 years ago a natural forest, surely Verra would not want to preserve the existing ecosystem but rather stimulate reforestation carbon projects?</li> <li>•The ambition of certification standards like Verra should be to contribute towards the 210 GtCO<sub>2</sub> target, as mentioned above. To make its safeguard policy consistent with this aim we believe that Verra should focus on protecting existing natural, non-degraded ecosystems not just any existing ecosystem. We trust/hope that is what is meant by the new policy.</li> </ul>
15	ANONYMOUS #11	N/A	N/A	<p>The projects that have already started on the ground, how do we comply with the section 3.19.2. in such case, which states that local stakeholder consultation has to take place before implementation of project activities. How does this work for retroactive projects wherein the project proponent wants to opt for the Verra certification much later after the start date of the project. Kindly clarify this in the updates.</p>
16	Debora Souza	Future Carbon Group	Brazil	Yes.
17	ANONYMOUS #12	N/A	N/A	<p>It does, but it can do with more descriptions, particularly with regards ecosystems. It was not clear what if safeguards plans are requested, as part of project implementation, as it is seem it is an initial assessment, but not monitoring. It is also problematic to keep the public comment period open and requiring a response from the proponent or VVB as this could be used for nefarious puposes by parties who dislike a project.</p>
18	ANONYMOUS #13	N/A	N/A	Yes. The structure is consistent with what previously existed, and Shell agree with the changes.
19	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	Yes

20 ANONYMOUS #14	N/A	N/A	<p>Aspects of these updates appear to be merging CCB requirements and mechanisms directly into VCS.</p> <p>Related to benefit-sharing, could a more precise definition of benefit-sharing be provided? Does benefit-sharing mean only credit sharing or could, for example, incentive payments that are made possible from carbon revenue be considered as benefit-sharing? Could value assets also financed by carbon revenue also fall under benefit-sharing that would not otherwise have been distributed? Could in-kind benefits funded by carbon revenue be considered as benefit-sharing?</p> <p>Regarding Local Stakeholder Consultation (LSC), why before project implementation and not project start? What is the precise distinction between implementation and start? For a tree planting project would the day the first tree is planted, or when preparation activities such as constructing nurseries be considered implementation?</p> <p>Regarding stakeholder responses outside of the public-comment period, how does this differ to the grievance mechanism under CCB?</p>
21 STX Group	STX Group	Spain	<p>Expanding AFOLU (Agriculture, Forestry and Other Land Use) specific requirements to apply to all project types and including ecosystem health requirements will strengthen the project integrity and solidity.</p> <p>Clarification is needed on how the demonstration of not net harm, identification of risks of any negative impacts and mitigation measures will be addressed.</p>
22 Simone Stevens	Forest Carbon Works	United States of America	<p>We would like to voice our support for the newest additions to the stakeholder engagement process and safeguard protections, particularly the improvements to section 3.18: Safeguards and 3.19: Stakeholder Engagement. Strengthening protections for vulnerable groups worldwide such as women and girls, human trafficking victims, and indigenous peoples is a crucial part of encouraging carbon markets to be a force for social good as well as environmental progress. We hope that these amendments to the program will push developers and the global voluntary carbon market as a whole to a higher level of integrity and care for human rights.</p>
23 ANONYMOUS #17	N/A	N/A	yes
24 Márcia Silva	Ibá	Brazil	<p>The new structure makes sense, but some aspects require clarification:</p> <ul style="list-style-type: none"> <li>•Regarding the Safeguards section, it makes sense to include items that condemn gender inequality, discrimination against women, child labour, and human trafficking. Since Verra is a global mechanism, it is necessary to address social aspects like these, in addition to including terms that respect human rights and protect the cultural heritage of indigenous peoples and local communities, making the standard even more sustainable. However, it is suggested to provide tools that assist in the preparation of a report to prove these aspects during an audit, for instance.</li> <li>•The stakeholders section provides relevant information, especially in emphasizing the need for a public consultation before project implementation. However, this section should include clearer and well-defined technical and procedural aspects that guide the public consultation process for the project. Additionally, it is suggested to consider the consultation with stakeholders in the Buffer calculation. Scoring will be given if the consultation with stakeholders is responded to by 50% of stakeholders living within the project area and 20% of stakeholders living outside the project area. Given this, we recommend the creation of specific tools that provide guidelines for conducting stakeholder consultations.</li> </ul>
25 Diego Toledo	re.green	Brazil	Yes. It makes more sense to treat such aspects of projects separately.
26 Carbonext	Carbonext	Brazil	<p>Overall, the new safeguards and stakeholder engagement requirements presents a structure that do make sense. However, it is important to highlight that it can increase the costs and complexity of project development before credit revenues, making it less attractive to investors. It's important to consider that projects that do not meet the new safeguards and engagement requirements may lose eligibility for carbon credit generation. Furthermore, the demand for more detailed assessments of the environmental and social impacts of the project, along with an adaptive management plan and corresponding monitoring, may require greater financial, human, and time resources. Implementing additional measures to mitigate negative impacts can also raise project costs.</p>
27 Jacob Penner	The Nature Conservancy	United States	<p>Yes, with one exception. Section 3.1 of the Proposal for Public Consultation mentions that "net positive impacts are now a requirement of the VCS Program and, therefore, cannot be used as a mitigation measure". However, there is no text in the Stakeholder Engagement and Safeguards section that corroborates this statement. Sections 3.18.2 – 3.18.9 still are labeled as 'No Net Harm' and not 'Net Positive'. This discrepancy should be rectified so that the removal of the 'net positive impacts' language from the AFOLU Non-Permanence Risk Tool is not at odds with the VCS Standard.</p>
28 ANONYMOUS #20	N/A	N/A	Yes, they make sense. We like that it is broken out into thematic requirements, it reads a lot clearer.
29 Bibiana Duarte	Systemica Net Zero	Brasil	Yes, the structure of Sustainable Development Goals and safeguards, makes sense.
30 Sebastian Lema	Center for Clean Air Policy	Colombia	No, as the new structure is not addressing the risks associated with the inequitable distribution of benefits between local communities (landowners) and other actors in the carbon market value chain.
31 ANONYMOUS #21	N/A	N/A	yes
32 ANONYMOUS #22	N/A	N/A	Yes
33 Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>Yes. It makes sense to treat such aspects of projects separately. Overall, the new safeguards and stakeholder engagement requirements present a structure that does make sense. However, it is important to highlight that it can increase the costs and complexity of project development before credit revenues, making it less attractive to investors. It's important to consider that projects that do not meet the new safeguards and engagement requirements may lose eligibility for carbon credit generation. Furthermore, the demand for more detailed assessments of the environmental and social impacts of the project, along with an adaptive management plan and corresponding monitoring, may require greater financial, human, and time resources. Implementing additional measures to mitigate negative impacts can also raise project costs.</p>

34	Julie Kelleher	3Degrees Group, Inc.	USA	<p>In response to the re-wording of 3.19.12: 3Degrees agrees that public comment periods are an integral aspect of a public registry and that stakeholder feedback improves the integrity and transparency of the voluntary carbon market. However, 3Degrees believes Verra should limit stakeholder comment periods to 30-days upon initial project listing with a draft PDD, upon final review of the validated PDD, and upon subsequent revalidations. Additionally, we urge Verra to create a separate process through which stakeholders can raise issues with specific project types and/or methodologies and receive a timely response directly from Verra staff.</p> <p>While we take stakeholder feedback extremely seriously and make every effort to ensure our projects meet the quality standards set out by Verra, we feel that allowing comments outside of designated 30 day comment periods will not meet the needs of stakeholders or project proponents. Under Verra's proposed update, stakeholders who submit comments outside of the comment periods will have to wait months, if not years, to receive a response from project proponents. Project proponents will similarly be forced to sit on potentially irrelevant or insignificant comments for the same length of time, despite having already received approval from Verra. Because stakeholder comments often take issue with entire project types or methodologies, our view is that Verra, rather than individual project proponents, should be responsible for defending the integrity of their standards. For those reasons, we urge Verra to develop a process for stakeholders to engage directly with Verra staff on methodology or project type-level issues.</p>
35	Zimmfor	Zimmfor Management Services Ltd.	Canada	yes
36	ANONYMOUS #23	N/A	N/A	Yes.
37	Joel DeBoer	EP Carbon	United States	I'm glad to see Verra implementing additional safeguards, especially with regards to recognizing the rights of local stakeholders and their rights. The proposed structure seems to make sense.
38	Juliana Magalhaes	ClimeCo	Canada	Yes, and particularly, I support the inclusion of indigenous people.
39	ANONYMOUS #24	N/A	USA	Yes.

## 2. Are there any project types that will not be able to meet the requirements above?

Comment #	Name	Organization	Country	Comment
40	Livio Pierro	Face the Future	Netherlands	The new requirements contribute towards achieving higher standards for carbon programs. I believe these requirements are fundamental to guarantee the fairness of VCS Programs (we have seen already bad examples in the past thus enforcing these requirements is crucial for the credibility of carbon certification and avoiding bad publicity).
41	ANONYMOUS #2	N/A	N/A	<p>1. Projects with limited budgets or resources may find it challenging to conduct extensive risk assessments, stakeholder consultations, or comprehensive documentation of impacts and mitigation measures. These projects may require additional support or flexibility in meeting the requirements.</p> <p>2. Projects that have already started will not be able to retroactively meet many of these criteria. The guidance needs to be clear in defining when the standard becomes effective as it relates to the project start date. There are certain project types, such as Sector 6 construction in which carbon credit futures are not claimed and the project needs to be completed in order for the emission reductions to then be calculated and claimed. The project pipeline listing date is not a valid date to enforce the adoption of these new standards.</p> <p>3. Projects that involve innovative or experimental approaches, which may not have well-established frameworks or precedents, could face difficulties in aligning with all the proposed guidelines. Flexibility and adaptability in evaluating these projects may be necessary to encourage innovation while ensuring environmental and social safeguards.</p>
42	Mark Ritchie	Soils for the Future and CarbonSolve	USA	<p>3.18.16 The project shall not negatively impact terrestrial and marine biodiversity and ecosystems. ...</p> <p>This is impossible to reasonably demonstrate or even quantify for ANY project. What constitutes harm to an ecosystem? The decline in abundance of one or more species? Changes in rates of nutrient cycling? For example, if trees are planted and insect species that like open habitats decline, does that represent "harm" to an ecosystem? If perennial grasses are restored and certain seed-eating rodents decline in abundance, does that represent "harm" to an ecosystem? Or alternatively, if fire returns to an area after restoration but is properly assessed in carbon accounting, does that represent harm to an ecosystem?</p> <p>"Harm" is a subjective term and project changes viewed as positive by one stakeholder may be viewed as "harm" by another.</p> <p>Further, without measuring a multitude of different variables (N cycling, productivity, species diversity, energy flow through food chains, etc) how can project proponents demonstrate that they will not or have not "harmed" the ecosystem?</p>
43	Eric Wilburn	NatureBridge	USA	No comment
44	ANONYMOUS #4	N/A	N/A	Yes
45	ANONYMOUS #7	N/A	N/A	In the area of nature-based credits, I cannot think of any high-quality project that would not be able to meet these requirements. Cannot speak for other sectors.
46	ANONYMOUS #8	N/A	N/A	Considering only AFOLU projects, I think some of the requirements might not always be applicable, for example, if there are no employees. Would all requirements need to be demonstrated, or only those that are applicable?

47 Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	3.18.12 and 3.18.13 will be hard to evidence and prove (equal pay for equal work and no forced labor). For the latter, proving the absence of something is difficult. Having a policy in place to address the forced labor etc concern can be done – but what US university or US charging network is likely to have a policy prohibiting forced labor, child labor and trafficking when this is not a concern that seems remotely likely? These concerns could arise for US agriculture project but are so remote for many other sector projects that policies may not even be developed to address such contingencies. As such, many energy and transportation projects, especially those based in the US, may not be able to demonstrate they meet these requirements.
48 Indradeep Das	ReNew	India	Projects which are already ongoing might be complicated to verify again.
49 Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	That's currently unclear because of the broad terminology used, but potentially yes. We therefore urgently suggest to clarify and improve on the wording conversion of an "existing ecosystem" (3.18.8) and make sure the focus of Verra remains on stimulating AFOLU CDR projects that have a positive impact on the local economy, communities and local biodiversity.  For example, is pasture for cattle grazing considered an existing ecosystem that should not be converted to forest plantations? If pre-project land is degraded, for example by swidden agriculture / slash and burn practices, would this be considered an existing ecosystem?
50 ANONYMOUS #11	N/A	N/A	The projects that have already started on ground can not meet the requirements in section 3.19.2
51 Debora Souza	Future Carbon Group	Brazil	Some ARR and ALM projects will not be able to meet the requirements due to a poor definition of what could be considered "existing ecosystem" or in case of degraded ecosystems, the requirement to "demonstrate that the project activity will not convert the ecosystem type which existed at least ten years prior". This is still confuse and may lead to errors of interpretation by PP or VVB.  The addition to "3.19.2 The project proponent shall conduct a local stakeholder consultation BEFORE implementation" may be challenging, specially for REDD+ projects, as (i) the process to identify local stakeholders will likely be connected to and/or may configure a project activity on itself (ii) conservation activities may not impact all stakeholders. As such we would suggest the following language: "3.19.2 The project proponent shall conduct a local stakeholder consultation before implementation of project activities that impact said stakeholders directly. Such consultations shall be done in a manner that is inclusive, culturally appropriate, and respectable of local knowledge."
52 ANONYMOUS #12	N/A	N/A	ARR and ALM projects on private land may have difficulty to meet the safeguards criteria regarding community benefits as they may not involve any local communities.
53 ANONYMOUS #13	N/A	N/A	Shell sees a need to clarify the expectations for benefit sharing agreements (3.18.20) for already validated projects. For these projects, will they be required to agree benefit sharing agreements for verification?  If the expectation is that projects will have a final benefit sharing agreement at validation then this requirement may be unrealistic for smallholder projects with large numbers of stakeholders, particularly where education and literacy is low.  In these cases, additional time is needed to build capacity of stakeholders to meaningfully engage in benefit sharing design and discussions. Shell instead suggests that Verra only require a draft plan for validation, with a full version ready and implemented by the first verification.
54 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	No feedback
55 ANONYMOUS #14	N/A	N/A	What would be consistent with SDG objectives? Does this require that only 1 SDG target of the country is exhibited by the project, or does the project need to meet specificities stipulated by the country SDG objective(s)? What happens in the case where a project does not align with SDG objectives, can SDG objectives not targeted by the country be considered as going beyond country objectives?
56 STX Group	STX Group	Spain	Those projects in which local communities are not affected by the project activities and participation is not needed, could occur that will not meet all the requirements (e.g., CCS/DAC and other industry specific projects). Nevertheless, reviewing all these requirements for all projects would help the project proponent to perform a proper check.
57 Lynn Riley	American Forest Foundation	United States	We appreciate the additional requirements, and are excited for VCS to meet the requirements of the Core Carbon Principles. We suspect that the requirements above will be able to be met. However, we share a note of caution that the requirements as written could add significant workload to project proponents to demonstrate and to VVBs to validate, creating an even longer process of validation/verification and perhaps stretching it to untenable lengths that would discourage project development. Anything that Verra can do to provide clear, operational ways in which project proponents can demonstrate they have met these pieces will be critical, such as defined terms and specific examples for how projects might demonstrate these pieces, would be helpful.
58 ANONYMOUS #17	N/A	N/A	Wetlands restoration projects where land conversion is near total.

59 Márcia Silva	Ibá	Brazil	<p>AFOLU projects will face difficulties. Item 3.18.18 number 3 needs clarification, as this point could pose problems for the implementation of several projects, especially within the Brazilian territory. Stating that degraded areas, when utilized, must restore the previous ecosystem, limits the use of land, potentially leading to the abandonment of degraded lands. A better definition of the term "degraded" because it is not clear whether it is considering any area that has been degraded regardless of the status of the original ecosystem or if it would only be those areas that would have the original ecosystem remaining but in a degraded way. Instead of revitalizing these lands for productive purposes, they may continue to degrade, becoming more unproductive. Additionally, this criterion conveys the impression that the potential for sustainable development in several countries is fixed only from now, leaving little flexibility for countries in less advanced stages of development to work in environmentally correct, economically viable, and socially just ways in diverse territories.</p> <p>The primary focus of regulation for AFOLU projects should be to encourage the conversion of non-forested areas (degraded or not, for example, used for other economic activities but not degrading) into forested areas or the conservation of existing forests, without increasing the risk of any of these projects leading to a net forest loss. Therefore, projects should not be restricted to degraded areas only, as there are other eligible and non-degrading previous uses.</p>
60 Diego Toledo	re.green	Brazil	<p>Project types may have a specific dynamic between the project area and the local stakeholders. Areas of private companies may have low interaction with local stakeholders, so the requirement to conduct a stakeholder consultation before project implementation may have low impact both for the project and the local stakeholders. In other cases, like government concessions, it makes more sense to conduct the stakeholder consultation before project implementation. Therefore, this requirement may allow flexibilities, such as conducting a local stakeholder consultation before and/or during the initial phases of project implementation.</p> <p>These same logical flexibilities, according to the project type, may be revised for other requirements.</p>
61 ANONYMOUS #18	N/A	N/A	<p>Smallholder ARR projects are unlikely to be able to meet a number of new requirements.</p> <p>For example:        3.18.17 "The project shall not introduce non-native monocultures for the purpose of restoration."        It is unclear if this new requirement means that projects that include non-native monocultures cannot claim restoration benefits, or if non-native monocultures will no longer be certified as ARR activities by VCS.        In any case, this change could jeopardize a number of ARR projects, particularly those working on degraded lands and/or with smallholder farmers. In such challenging environments, for projects to be commercially viable, species selection has to be extremely practical with short cash cycles and easy seed supply access. It can lead to the selection of species like hemp or eucalyptus which, when managed sustainably, have proven benefits, despite not being native and having to be monocultured. Compared to a baseline scenario of further land degradation, that's still a victory for carbon and restoration outcomes.        Therefore, instead of completely excluding non-native monocultures, it would be more effective to increase the safeguards associated with them (such as: a maximum size for individual stands, requirements for low intensity management, mixed species at the project level) to ensure that these projects remain viable while delivering tangible restoration impact.</p> <p>3.18.18 "Activities that convert existing ecosystems are not eligible under the VCS Program."        It is very unclear why Verra would want to exclude activities that transform non-native ecosystems for the purpose of increasing carbon sequestration and biodiversity. This would result in a large share of ARR projects becoming ineligible - including all afforestation projects - and would drastically limit the potential of nature-based solutions for climate change mitigation at a global scale. Don't we need to plant more trees, and fast?        To avoid confusion, we need a clarification of what "existing ecosystems" mean and if, for example, the conversion of degraded farmland into forested land is included. In case native forests were converted long ago into farmland, and this land is now barren or overgrown with shrubs, would ARR activities on this land be eligible? If not, why so, and where would ARR activities be eligible?</p>
62 Carbonext	Carbonext	Brazil	<p>It is understood that reducing social project risks is very important to project permanence, but requiring all the safeguards to be implemented and effective before credit revenues could make most of early-stage projects financially unfeasible. It is important to understand that projects mature over their lifetime.</p> <p>The importance of well-structured and effective measures for stakeholder engagement with projects is unquestionable. However, the development of actions and implementation of these measures in a project should not be demanded before its inception. This is not only due to financial reasons (lack of credit resources in the early stages) but also, because such requirement would make it unfeasible for a project to apply for retroactive credits, where greenhouse gas reduction/sequestration measures have already been implemented.</p> <p>Therefore, this point must be questioned, and a solution must be sought that does not hinder the possibility of retroactive credits where climate-beneficial actions can be duly validated.</p>

63 ANONYMOUS #20	N/A	N/A	<p>The rules on Ecosystem Health (3.18.17 &amp; 3.18.18) should be clarified so as not to exclude projects that are planting on degraded grasslands - unless the intention is for afforestation on grasslands not to be eligible. It is unclear language, notably section 3.18.18.</p> <p>Definition of a monoculture (in terms of minimum size and scale) should be specified. Is monoculture at project level or is monoculture at field/farm level?</p> <p>(For example, mosaic planting of various species means there may be swaths of land that has a monoculture but with the intention of those trees to propagate naturally over time between each other...)</p>
64 Bibiana Duarte	Systemica Net Zero	Brasil	For ARR projects the restoration activities allowed should be specified. Regarding the proposed requirement 3.18.17-3, monocultures should not be allowed even with native species since a diverse floristic structure is required in such restoration processes.
65 ANONYMOUS #21	N/A	N/A	yes
66 ANONYMOUS #22	N/A	N/A	No
67 Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>Some AFOLU projects will face difficulties, especially in countries at less advanced stages of development where there is a lot of degraded and unproductive land, and the AFOLU projects could be a viable opportunity for sustainable development. By stating that planting activities in degraded areas must restore the previous ecosystem, land use will be limited, which may lead to the implementation of few or non-permanent projects. In addition, we strongly recommend the introduction of a clear and objective definition of the term "restoration" in order to avoid confusion during the elaboration of projects. Within the eligible activities for ARR projects, depending on the definition used, restoration can fit into the different activities. Finally, we recommend that the use of non-invasive alien species should not be limited in projects when implemented sustainably, as planting these species can facilitate ecosystem recovery and bring financial viability to AFOLU projects.</p> <p>Also, project types may have a specific dynamic between the project area and the local stakeholders. Areas of private companies may have low interaction with local stakeholders, so the requirement to conduct a stakeholder consultation before project implementation may have low impact both for the project and the local stakeholders. In other cases, like government concessions, it makes more sense to conduct the stakeholder consultation before project implementation. Therefore, this requirement may allow a level of flexibility, such as conducting a local stakeholder consultation before and/or during the initial phases of project implementation. These same logical flexibilities, according to the project type, may be revised for other requirements.</p>
68 Zimmfor	Zimmfor Management Services Ltd.	Canada	AFOLU projects that have initiated project activities prior to listing and prior to stakeholder engagement (i.e., project activities are initiated during project feasibility stages). During this phase public engagement is at times not yet warranted, or in some cases even contractually restricted. Once a project is listed (within 3-year allowable timeframe) retroactive stakeholder engagement cannot be conducted, and therefore the proponent would not be eligible to gain credit for the first years of project implementation.
69 ANONYMOUS #23	N/A	N/A	<p>VSI answer - summary: there are some project types, related to ALM in certain regions, that may not be able to meet the Stakeholder Engagement and Safeguards requirements. But also more generally, beyond project types, some projects may not meet these requirements due to the way ALM operations are commonly undertaken, i.e. these requirements may add a significant burden and limitations that project developers and participants are not prepared to overcome as they may view these as too complex, constraining or irrelevant. This is the case for mandatory requirements concerning:</p> <ul style="list-style-type: none"> <li>•No net harm safeguards: some ALM interventions may have time-lags with regards to measurable impacts, which may not all be captured within the planned validation and verification timeframes.</li> <li>•Risks to local stakeholders and the environment: some ALM interventions may expose local stakeholders to environmental effects that are routinely described and known as part of ALM activities. Requiring project proponents to identify and mitigate project impacts caused by these interventions would add little value to stakeholders already used to working under such conditions and, if anything, would increase the administrative burden to provide required documentation.</li> <li>•Respect for Ecosystem Health: the conversion of existing ecosystems within the last 10 yrs may limit certain projects where ecosystem change is part of a managed landscape approach and where some ecosystem changes (e.g. deforestation) are legalized (within pre-established parameters) by governing institutions within the country.</li> <li>•Property rights: the requirement for projects to share benefit-sharing plans and arrangements may breach data protection and confidentiality policies affecting certain players in the ALM space.</li> <li>•Stakeholder consultation: undertaking stakeholder consultation prior to the start of project activities may not be feasible considering the historical crediting possibility many project developers appear to be leveraging.</li> </ul>
70 Joel DeBoer	EP Carbon	United States	I do have concerns about the eligibility of some ARR project activities currently eligible under the VCS. Please see my response to question #9 below.
71 ANONYMOUS #24	N/A	USA	Some commercial reforestation activities, and potentially agroforestry projects, could be excluded, depending on interpretations of language that is in need of further clarification (see below comments).

3. Are there any requirements above that should be strengthened?				
Comment #	Name	Organization	Country	Comment
72	Lasse Leipola	Finnwatch	Finland	<p>The requirements should take into account that the global authoritative standard on business and human rights is the UN Guiding Principles on Business and Human Rights (UNGPs). Due diligence and responsible business conduct are also further elaborated in the recently updated OECD Guidelines for Multinational Enterprises and in the OECD Due Diligence Guidance for Responsible Business Conduct. All three should also be explicitly mentioned in paragraph 3.18.11.</p> <p>According to the above mentioned international standards, the corporate responsibility to respect human rights refers to internationally recognised human rights, understood at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Accordingly, the reference to ratification by the host country should be deleted in paragraph 3.18.11, and a reference to ILO Declaration added. Alternatively, this paragraph could also simply refer to "internationally recognised human rights".</p> <p>The paragraph 3.18.3 should be rewritten to take into account that in order to meet their responsibility to respect human rights and to be able to know and show that they respect human rights, project proponents should have in place 1) a human rights due diligence process to identify, prevent, mitigate and account for how they address their potential adverse impacts on human rights; and 2) Processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute."</p> <p>Also, the subtitle "No Net Harm" (above paragraph 3.18.2) should be removed as no "harm" to human rights should be allowed to be compensated with some other benefits. Also, there is no – and shouldn't be! – any mechanism to do such "netting" of harms and benefits.</p> <p>UNGPs: <a href="https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights">https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights</a></p> <p>OECD Guidelines: <a href="https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm">https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm</a> and <a href="http://mneguidelines.oecd.org/mneguidelines/">http://mneguidelines.oecd.org/mneguidelines/</a></p> <p>ILO: <a href="https://www.ilo.org/declaration/lang--en/index.htm">https://www.ilo.org/declaration/lang--en/index.htm</a></p>
73	Livio Pierro	Face the Future	Netherlands	<p>Section 3.17.1 should be strengthened. Remove "where possible" and make compulsory for the project proponent to demonstrate how they contribute towards the SDGs they claim. Again, important for the credibility of VCS program and Verra.</p>
74	ANONYMOUS #2	N/A	N/A	<p>1. It is essential to review and adapt the proposed guidelines on a case-by-case basis, considering the specific characteristics, limitations, and contexts of each project. Not every AFOLU standard is going to be applicable to every non-AFOLU project.</p> <p>2. How is proposed change 3.18.6 - "The management teams involved in the project shall have expertise and prior experience implementing carbon projects, or land management projects if applicable, with community engagement at the project scale. "</p> <p>What is the definition of "expertise and prior experience", how can a project developer move forward if it's not clear what Verra defines as sufficient? Risk involves moving forward with project implementation and finding out down the road it's not meeting undefined standards.</p>
75	Mark Ritchie	Soils for the Future and CarbonSolve	USA	<p>Strengthening really isn't the issue - the problems arise in how VVBs would determine whether requirements are met or not</p>
76	Eric Wilburn	NatureBridge	USA	<p>Under Section 3.18.20, the requirement that Benefits Sharing Arrangements be included in the PDD is a welcome inclusion in taking steps towards ensuring financial equitability. But in order to fully ensure financial fairness and transparency, the reporting of the distributions of benefits should be included with each project verification to ensure that the benefits sharing arrangement is being followed throughout the lifetime of the project. I recommend updating the verification methodology to include financial reporting.</p>
77	ANONYMOUS #4	N/A	N/A	<p>Yes</p>
78	ANONYMOUS #5	N/A	N/A	<p>SDGs: Has Verra created a process to validate/verify SDG contributions? For investors/buyers looking for projects with verified SDGs, it is clear how this is done in GS for example but unclear how Verra is doing this.</p> <p>Section 3.18.12 This provision should include any marginalized group within the set of stakeholders, discrimination isn't limited to gender.</p>
79	ANONYMOUS #6	N/A	N/A	<p>There are several new updates that require engagement with varied stakeholder groups within a project area. What, if any, language requirements will accompany these changes in the future? What is the expected timing component (e.g., engagement once prior to implementation, engagement during every monitoring period, engagement every 10 years, etc.)?</p>
80	ANONYMOUS #7	N/A	N/A	<p>We very much welcome the inclusion of mandatory benefit sharing, reporting on said agreements, and text explicitly calling on project developers to consider gender equality. That said, transparency in carbon markets remains an issue, and we would recommend that the text is strengthened to state that benefit sharing agreements will be published and publicly accessible within the Verra registry, as will the relevant reports.</p> <p>We also note that the need for a safe grievance reporting mechanism for local stakeholders to provide feedback on issues which affect them is not explicitly required.</p>
81	ANONYMOUS #8	N/A	N/A	<p>I do not think they need to be strengthened but guidance will be needed to define what some of these mean and how they will be verified.</p>

<p>82 ANONYMOUS #9</p>	<p>N/A</p>	<p>N/A</p>	<p>Safeguards</p> <p>1) The Stakeholder Engagement and Safeguards section must distinguish between rights holders and stakeholders. While different groups of people can be stakeholders to a project, not all stakeholders' rights will be impacted. Further, where collective rights exist to lands, only the collective rights holders can give their free, prior, and informed consent to a project that may affect those lands.</p> <p>2) The Stakeholder Engagement and Safeguards section contains no reference to the UN Guiding Principles on Business and Human Rights nor the OECD Guidelines for Multinational Enterprises which are a minimum standard for business conduct, and require companies to respect internationally recognized human rights above compliance with national regulation. The VCS should specifically require that project proponents respect internationally recognized rights of Indigenous and Tribal Peoples, above compliance with national regulation. This is particularly important, because otherwise, projects may be implemented in accordance with government programs that fail to adequately respect the rights of Indigenous Peoples or other communities with collective rights.</p> <p>3) The list of instruments should expand to include the Convention on Biological Diversity, as well as regional human rights instruments, including the American Convention on Human Rights, African Charter on Human and Peoples Rights.</p> <p>4) The safeguards section contain no reference to free, prior, and informed consent (FPIC), but rather, FPIC is only mentioned in the stakeholder engagement section.</p> <p>Where consent is mentioned in the safeguards section, it is only mentioned in relation to relocation. FPIC must not be viewed as "stakeholder engagement", but rather a process and a right that Indigenous and Tribal Peoples have to protect right rights, including to self-determination, right to lands, territories and resources, and right to enjoy their own culture. The safeguards section should include the requirement to respect the right to free, prior, and informed consent in all matters covered by Indigenous and Tribal Peoples' specific rights.</p> <p>5) The paragraph (3.18.20) states that benefit-sharing should be "consistent with applicable national rules and regulations". However, this must expand to include "consistent with applicable law, including international human rights law and standards, national law, and customary law" to ensure benefit-sharing agreements are not undermined by national regulation, or government actors that fail to ensure just and equitable benefit-sharing.</p>
			<p>6) In addition to participating in the benefits taking place on Indigenous territories, Indigenous Peoples have a right to compensation for any adverse impacts. Such mechanisms "must be aimed at repairing all possible adverse impacts of corporate activity on the daily life of indigenous Peoples, including not only the impact on their environment or productive capacity, but also the impact on the social, cultural and spiritual aspects of their life". As such, any limitation or deprivation of property, religious, or cultural rights to lands, territories, and resources should be compensated for separately from benefit-sharing. See UNDOC A /HRC/15/37, para. 71-75.</p> <p>Stakeholder engagement</p> <p>1) Stakeholder engagement is defined in the consultation paper as: "Projects must engage with local stakeholders during the project development and implementation processes".</p> <p>Stakeholder engagement is a broad concept and may not lead to rights-respecting outcomes. This section must expand and specifically address rights holders, and add the following requirement "Projects must consult with rights holders in accordance with international human rights standards and ensure respect for their individual and collective rights, including collective rights to lands, territories and resources, and autonomous institutions and governance systems."</p> <p>2) Paragraph 3.19.16 states that activities should not be undertaken if it could exacerbate a conflict, but does not explicitly require free, prior, and informed consent. The paragraph should expand and explicitly require free, prior, and informed consent if Indigenous and Tribal Peoples' rights are affected, including but not limited to the right to self-determination, right to enjoy one's own culture, and right to lands, territories and resources. If FPIC is not obtained, then a project should not proceed.</p> <p>Where a project affects Indigenous Peoples or Tribal Peoples' rights, the project proponent should verify, through an independent assessment that the project has obtained FPIC through Indigenous Peoples' freely chosen representatives, through their own procedures. The outcomes of the FPIC process should also be subject to public comment.</p>

83 Martin Camilo Perez Lara	NA	Colombia	<ul style="list-style-type: none"> <li>■ The right of Free, Prior and Informed Consultation of Traditional Peoples and Communities must be safeguarded. While Verra's REDD+ methodologies include this information, the technical note highlights projects where this requirement is unmet. This highlights issues with the validation and verification process, conducted by verification and validation bodies (VVBs), which are in charge of auditing the REDD+ project and should ensure projects that do not meet the VCS methodology should not be approved and issue carbon credits.</li> <li>■ Benefit sharing documentation must be publicly disclosed so that third parties can access the information and evaluate the terms listed in benefit sharing agreements. This is because benefit sharing must be based on respect and autonomy of traditional people and communities. This has to avoid disclosing personal information that is considered sensitive.</li> </ul>
84 Kris Hendrickx	Global Evergreening Alliance	Australia	<p>3.18.8. This statement should address risks to women and girls conferred by project activities. It is beyond the scope of any project to address all risks to women and girls, particularly those engendered by cultural norms and practices.</p> <p>3.18.17 For projects that include planting or introduction of species: 1) The project shall not introduce any invasive species or allow an invasive species to thrive through project implementation. What is the definition of "thrive?" Keen to understand how a project proponent can demonstrate that their project activities have not allowed an invasive species to thrive? For example, how can project proponents demonstrate that their project activity caused the species to thrive versus increasing due to factors other than the project activity? What if the invasive species increases due to the indirect effects and chain of unintended consequences of the project activity that would not have reasonably been expected to occur prior to the start of the project?</p>
85 Morten Pedersen	Coordinator APS	Denmark	<p>Section 3.18.9. The project proponent shall identify and mitigate any project impacts caused by pollutant emissions to air, discharges to water, noise and vibration, the generation of waste, the release of hazardous materials as a result of project activities.:</p> <p>Realistic it is not possible to mitigate all project impacts - like transportation to sites (air), there will be waste plastic bottles and also plastic bags for seedlings when planting and so on (waste). Maybe it is good in this section to introduce de minimis, so focus will be on the huge negative impact.</p> <p>3.18.17 For projects that include planting or introduction of species: 3) The project shall not introduce non-native monocultures for the purpose of restoration.</p> <p>In most agroforestry projects we will plant non-native species even it is not natural for the country. Please elaborate.</p> <p>3.19.12 Stakeholders may submit comments outside of the 30-day public comment period. The project proponent shall take due account of any comments at the subsequent validation or verification process, which means it will need to either update the project design or demonstrate the insignificance or irrelevance of the comment. It shall demonstrate to the validation/verification body what action it has taken.</p> <p>It is a good idea to introduce this paragraph. For some projects the verification will only be in 3-5 years interval and therefore it is appropriate to propose that an reaction shall within one year.</p>
86 Indradeep Das	ReNew	India	All aspects seem adequately addressed. Would write to Verra again if necessity arise.

87 Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	<p>3.18.16: WE SUGGEST TO ADD “NATURAL, NON-DEGRADED” BEFORE THE TERM ECOSYSTEMS                  In our understanding of the literature the term “ecosystem” is a concept that is very broadly defined and can range from very generic (macro ecosystems) to very specific (micro ecosystems) depending on the nature of the analysis. It can refer to natural ecosystems (as is most often implied) but could also include human interactions within the ecosystem. This lack of clarity makes it difficult to understand what Verra actually means and therefore potentially leads to confusion between project proponents and VVB’s. First, if we take the guidance literally (as VVB’s are supposed to do) “ecosystem” could also mean a degraded grazing land with cattle. For clarity we think that Verra means “natural ecosystem” in the guidance, but it doesn’t say that. Hence the requirement of “no conversion of existing ecosystems” would also prevent any project wishing to make a positive change in the landscape to be included in VCS. It’s clear that is not what you mean, but the guidance should be clearer on that. On a more practical level, it is not clear to us if the currently proposed changes in wording should be interpreted to exclude a whole range of categories such as ARR projects converting degraded grasslands and ARR agro-forestry projects that are currently eligible under Verra.</p> <p>3.18.18: WE SUGGEST TO REPLACE “EXISTING” WITH “NATURAL, NON-DEGRADED” BEFORE “ECOSYSTEMS”                  Justification: See above under 3.18.16</p> <p>3.18.1,1) WE SUGGEST TO ADD THE WORDS “DUE TO THE PROJECT ACTIVITY” AFTER “EXISTING NATURAL NON-DEGRADED ECOSYSTEMS”                  This key point of this safeguard is that any conversion of natural ecosystems is not caused by the project but happened already prior to the start of the project. It’s worth making that explicit so any readers understand its purpose.</p> <p>3.18.1,1) WE SUGGEST TO ADD THE WORDS “OCCURRED IN THE PRE-PROJECT PERIOD DUE TO THE PRE-PROJECT LAND USE OR” AFTER “OCCURRED”:                  So it reads:                  “Evidence shall be provided in the project description that any ARR, ALM, WRC or ACoGS project areas were not cleared of natural, non-degraded ecosystems due to the project activity (e.g., evidence indicating that clearing occurred in the pre-project period due to the pre-project land use or natural disasters such as hurricanes or floods.”                  Justification:                  In many cases conversion of natural ecosystems is caused by unsustainable land use practice in the pre-project scenario such as slash-and-burn agriculture and cattle grazing. It’s helpful to mention this so VVB’s and project proponents know that such evidence is eligible.</p> <p>3.18.18, 2): ADD THE WORD “IN THE BASELINE SCENARIO” AFTER “TOOK PLACE” AND REPLACE “TOOK PLACE” WITH “STARTED”                  In many cases conversion of natural ecosystems is the result of a long process of land degradation due to human-caused processes (cattle grazing, or slash-and-burn agriculture) and would most likely continue in the absence of the project activity. If a project activity can demonstrate that these degradation activities were started more than 10-years before the start that is a sufficiently long period to demonstrate that the degradation process is serious and is not caused by the project activity</p> <p>3.18.18, 3) UNCLEAR WHAT IS MEANT HERE.                  In our experience the land use (including its degradation signs and impact) that we find in the pre-project situation also existed 10 years before. If the purpose is to demonstrate that, we would suggest:                  “Where the land is considered degraded, the project proponent shall demonstrate that this also existed at least ten years prior. Such demonstration shall use remote sensing, aerial imagery, modelling, or other relevant literature.”</p> <p>“At least 10 years prior” is a very long period. If the purpose is to refer to a historic natural ecosystem it should be acknowledged that this is very complicated and a lot more detailed guidance should be provided by projects to understand how to get this right. Such guidance should clarify amongst many others how to:</p> <ul style="list-style-type: none"> <li>•Select the period a project could consider historic natural ecosystems;</li> <li>•Deal with different ecosystems that may have existed historically;</li> <li>•Deal with natural ecosystem adjustments to changing human interactions with the land;</li> </ul> <p>Instead of looking historically we believe it is more relevant for carbon projects to compare their impact to the most likely baseline scenario. For example, many land use in Latin America consists of cattle grazing that has led to a steady conversion of natural ecosystems and will continue to do so in the absence of a carbon project activity. This will go up to the point that the land is converted into a cultural landscape with only small pockets of natural ecosystems. This is a scenario that Verra should really try to avoid.</p>
88 ANONYMOUS #11	N/A	N/A	<p>Section 3.19.12 - Please clarify the Public comments made outside the 30 day Public commenting period, where can the Project proponent find these comments?                  Will they be sent separately to the Project proponents or uploaded on the registry as and when they are received?                  Please clarify this in the updates.</p>

89 Debora Souza	Future Carbon Group	Brazil	<p>This requirement should be strengthened: “ 3.18.17 (3) The project shall not introduce non-native monocultures for the purpose of restoration”. From our point of view, the project should not introduce non-native monocultures, independent of the purpose. Ergo, we propose the alternative language: “ 3.18.17 (3) The project shall not introduce non-native monocultures for any purpose.”</p> <p>In addition, the term “existing ecosystem” in 3.18.18 should be better defined because any place could be an existing ecosystem, even if it is degraded or composed of non-native invasive species. From our point of view, it should read “existing native ecosystem”.</p> <p>Furthermore, as mentioned previously, the following requirement should be better described: “3.19.2 The project proponent shall conduct a local stakeholder consultation before implementation of project activities”. It should not be applicable to “any project activities”, because there are many project activities that do not impact stakeholders, such as purchase of equipment to improve surveillance within the project area, installation of fire breaks within the property, etc. Therefore, we suggest “3.19.2 The project proponent shall conduct a local stakeholder consultation before implementation of project activities that impact said stakeholders directly.” as a more appropriate language.</p>
90 ANONYMOUS #12	N/A	N/A	<p>The definition and conditions of ecosystem conversion needs to be revised. It is unclear if degraded systems can be converted. The definition of degraded ecosystem is vague and requires revision. The wording should be changed from “existing” to “native” ecosystem. Provide examples of degraded ecosystems. Also restricting dominant land cover of converted lands to invasive species is restrictive, it can be changed to non-native. Point 3 is particularly confusing – if a native grassland ecosystem was converted more than 10 years ago to a cropland, this implies that the land won’t be eligible for afforestation even though it is highly unlikely that the original grassland system can be restored? Same situation if it was indigenous forest converted to cropland, will it be eligible for a monoculture timber plantation?</p> <p>What evidence is required to show that clearing of a native ecosystem was not done for the purpose of generating carbon credits?</p>
91 Inigo Wyburd	Carbon Market Watch	Belgium	<p>We recommend the below changes:                  In the “No net harm” section:                  3.18.2                  - VCS safeguard policies are enforced by auditors chosen by project proponents, there is concern regarding bias and subjectiveness by auditors. Any conflict of interest should therefore be removed, auditors should be chosen by an external third-party.                  - A binding mechanism for accountability should be introduced in order to address harms when they occur and enable redress of such harms.                  - Compliance should be more heavily enforced and rubber-stamping should be prevented. Strict enforcement of safeguard policies need to be implemented, ensuring that projects comply with safeguards so that they are not causing harm to local communities, indigenous communities or the environment.                  3.18.5                  - Loss of livelihood should be included in the list of identified risks to stakeholders.                  3.18.6                  - The management team should be required to have experience of the local context, not just of the implementation of this type of project, or to partner with actors who have such local experience.                  3.18.9 (new item)                  - Project proponents shall also identify any risks related to the safety and wellbeing of children                  Respect for Human Rights and Equity                  3.18.11                  - Verra safeguard policies should align with those safeguard policies which are considered “best-in-class” on an international level, for example, International Finance Corporation (IFC) performance standards and the Green Climate Fund (GCF) safeguards.                  - The inclusion of “ratified by the host country” is unclear. What would happen in the case of a project implemented in a country that has not ratified the International Bill of Human Rights?                  Ecosystem Health                  3.18.16                  - The inclusion of the term arboreal biodiversity as a specific term for defining tree dwelling species.                  - Project proponents should be required to identify endemic, vulnerable, threatened or endangered species, and recognize, respect and promote the protection of these species in line with applicable animal rights laws, and United Nations Convention on Animal Health and Protection (UNCAHP).                  - Project proponents shall inform themselves using internationally recognized information sources regarding the global extinction risk status of animals, plants and fungus like the International Union for Conservation of Nature’s Red List of Threatened Species (IUCN Red List). Based on information from such sources the project proponent shall take the necessary steps to ensure that key sites, habitats and ecosystems within and around the project, where these species are located are protected and not harmed by the project.                  - Project proponents for nature based solution projects should ensure that as little risk of harm is inflicted on these regions as possible, including by adopting the following measures.                      - No-go zones: project activities with a potential high impact on biodiversity are restricted or prohibited.                      - Independent Verification: An independent body should ensure the project is adhering to biodiversity standards.</p>

			<p>Property Rights 3.18.19</p> <ul style="list-style-type: none"> <li>- Project proponents must do the necessary due diligence of land tenure rights prior to the implementation of the project. This should include sufficient analysis of the project region in order to evaluate discrepancies in land ownership.</li> <li>- Project proponents should include in the analysis, any vulnerable communities who do not have a formal property title. These issues are inherent to regions with prior issues regarding displacement, and land grabbing.</li> <li>- Auditors should increase the amount of due diligence prior to validation, verification of projects.</li> <li>- Benefit-sharing agreements should be publicly available.</li> </ul> <p>Stakeholder Engagement 3.19.1</p> <ul style="list-style-type: none"> <li>- VCS safeguard policies should address and prevent procedural and substantive harm to all affected communities in relation to the implementation of the project. This should be considered independently of whether the project generates other stakeholder benefits.</li> <li>- Project proponents should consider language (illiteracy) and physical barriers (lack of connection to electricity) of local communities and stakeholders when conducting stakeholder consultations. In addition many projects tend to be located in remote and poorly connected areas where consultation can be difficult, project proponents should do the necessary due diligence in order to resolve these issues.</li> </ul> <p>Free, Prior, and Informed Consent (FPIC) 3.19.6</p> <ul style="list-style-type: none"> <li>- The FPIC lacks adequate guidance which opens the door to bias from project proponents and auditors, allowing them to reinvent this process according to their preferences.</li> <li>- The FPICs particularly important in the context of recognising indigenous peoples' land rights, and that this should be explicitly acknowledged in the VCS standard.</li> </ul> <p>Reference:</p>
92 ANONYMOUS #13	N/A	N/A	<p>Shell suggests that Verra provide a definition of "benefit sharing" under 3.18.20 since there is inconsistency in how the term is interpreted. For example, it is unclear if it is a revenue share only or if it includes "core benefits" such as employment or community programs that are part of project design. We recommend reviewing CAR's social safeguards as the requirements around what information is covered with stakeholders is extensive (cost and profit for developers). Greater transparency with stakeholders prevents exploitation of vulnerable communities where the knowledge gap can be vast. Examples from CAR's Mexican Forestry Protocol include:</p> <ul style="list-style-type: none"> <li>-General costs associated with Forest Projects and how project design may affect project profitability</li> <li>-Division of costs between the project developer, Forest Owner, and other parties involved</li> <li>-Economic benefits associated with carbon and other forest resources (through market mechanisms), along with sources or references for carbon prices</li> <li>-Distribution of benefits to the community and/or community members, including anticipated timing of distributions, and division of benefit payments to other actors, including project developers, aggregators, and other parties involved</li> </ul> <p>Under Human Rights, Verra should consider adding a reference to the Voluntary Principles on Security and Human Rights (VPSHR). For any project-type that has forest patrols, including those that operate in areas with illegal activity, there can be security and human rights risks from the project to the community and vice versa. Inclusion of the VPSHR means projects must analyze the security risk and demonstrate that the security provision is proportionate to the risk and ensure ongoing training and monitoring on use of force, de-escalation etc. The current implementation of the No Net Harm concept needs to be strengthened or revised to align with the proposed new requirements. The proposed requirements aim to prevent negative impacts on ecosystems, biodiversity, and communities, but they need to address the No Net Harm concept's fundamental premise. To ensure clarity, guidelines should be aligned to accurately quantify impact magnitude and determine appropriate efforts for achieving a genuine neutral or net positive outcome.</p>
93 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	<p>"Proprietary Rights" can be further detailed to ensure the actual consent and participation of credit rights holders. Especially for traditional communities and indigenous peoples.</p>
94 STX Group	STX Group	Spain	<p>3.18.20 Clarification is needed on how the benefit sharing arrangement will be verified.</p> <p>3.19.2 Clarifications/requirements definition is needed regarding retroactive projects.</p> <p>4.1.7 If a comment is submitted outside the 30-day public comment period, and the validation/verification process is ended, what VVB should evaluate the project proponent's response to that comment and when? A possible solution could be monitoring the comments submitted out of the public comment period at every verification event, as part of the verification process.</p>
95 ANONYMOUS #16	N/A	N/A	<p>Agoro Carbon welcomes the introduction of the new proposed Stakeholder Engagement and Safeguards requirements. In respect to the par. 3.18.13 cited, we would like to suggest to include the definition of forced labor, child labor, or trafficked persons. We also suggest that the definition of these terms shall be applied in accordance with the definition given by the applicable regulation valid in the jurisdiction in which the project is taking place, e.g. in national/state laws. In the proposed VCS changes it is unclear whether this requirement will be applicable only to the project proponent or it will be extended to the stakeholders of the project activity (e.g. subcontractors, implementation partners, in case of ALM projects - farmers etc). We would welcome clarification on this matter.</p>

96 ANONYMOUS #17	N/A	N/A	<p>3.17.1 Reference should also be made to NDCs (and or NCs). These are more recent and are more in people's minds with respect to climate change.</p> <p>"3.18.1 Project activities shall not negatively impact the natural environment, [Cultural heritage], local communities, or any SDGs [/NDCs]. Project proponents shall identify any such potential negative impacts of project activities and shall design and implement [targeted risk management+ activities [such as to avoid, minimise or mitigate any] negative impacts to the natural environment, [Cultural heritage], local communities, or any SDGs [/NDCs].</p> <p>3.18.2 The project proponent shall identify potential negative environmental and socio-economic impacts and shall take steps to [to avoid, minimise or ] mitigate them.</p> <p>It is good to stick to the narrow definition of "mitigate" as used in climate change discussions. In this document there are instances where the wider definition is used instead</p>
97 Márcia Silva	Ibá	Brazil	<p>Regarding the section "Ecosystem Health - 3.18.17", it is not clear about item 3 "The project shall not introduce non-native monocultures for the purpose of restoration.", given that there are no definitions about the term "restoration". So, we suggest strengthening the clarifications around this discussion and definition of the term "restoration".</p>
98 Diego Toledo	re.green	Brazil	N/A
99 ANONYMOUS #18	N/A	N/A	<p>3.18.8 "The project proponent shall identify any risks related to the safety of women and girls in the local community and shall design and implement mitigation measures to protect local communities against and appropriately respond to harm to women and girls".</p> <p>We suggest that Verra clarifies: "any risks *inherent to the project* related to the safety of women in girls...", or it sounds like the project proponent must protect communities against any pre-existing risk related to the safety of women and girls, which isn't realistic. We believe that project proponents should not try to address the negative consequences of socio-cultural norms that have no link to their activities, except if this is part of their theory of change and has been carefully designed in accordance with the communities.</p> <p>3.18.16 "The project shall not negatively impact terrestrial and marine biodiversity and ecosystems. Projects shall identify any risks to ecosystems and implement measures to ensure no negative impacts on ecosystems. Projects in, or adjacent to, habitat for rare, threatened, or endangered species shall demonstrate that they will not adversely impact these areas".</p> <p>Same concern as above, we suggest that Verra clarifies: "Identify any risks to ecosystems *inherent to the project* and implement measures to ensure no negative impact *from project activities* on ecosystems...."</p>

100 WWF-Brazil	WWF-Brazil	Brazil	<p>We provide five recommendations:</p> <ol style="list-style-type: none"> <li>The right to Free, Prior and Informed Consultation (FPIC) of Traditional Peoples and Communities (IPLCs) must be respected and community protocols must be followed.           <ul style="list-style-type: none"> <li>IPLCs (Indigenous People and Local Communities) own defined FPIC protocols that must be fully respected.</li> <li>VCS approach to FPIC must go beyond what is provided in the current REDD+ methodologies.</li> <li>While Verra's REDD+ methodologies include FPIC information, there is evidence that this requirement is not met. This highlights issues with the validation and verification process, conducted by verification and validation bodies (VVBs), which are in charge of auditing the REDD+ project and should ensure projects that do not meet the VCS methodology should not be approved and issue carbon credits.</li> <li>For example, the technical note (published in Portuguese, accessed through this link <a href="https://www2.mppa.mp.br/data/files/BC/26/73/19/5A739810F7967688180808FF/NOTA_TECNICA_CARBONO%20PUBLICADA_ASSINADA.pdf">https://www2.mppa.mp.br/data/files/BC/26/73/19/5A739810F7967688180808FF/NOTA_TECNICA_CARBONO%20PUBLICADA_ASSINADA.pdf</a>) issued by The Public Prosecutors Office of the State of Pará (MPPA), through the Operational Support Center for Human Rights (CAODH) and the Operational Support Center for the Environment (CAO Ambiental), and Brazil's Federal Prosecution Service (MPF), provided strong recommendations regarding the protection of rights of traditional peoples and communities in Brazil in the context of VCS-REDD+ projects that issue carbon credits to the voluntary carbon market.</li> </ul> </li> </ol> <p>#####</p> <ol style="list-style-type: none"> <li>Parties must adequately prove real estate ownership or entitlement through valid and official documents.           <ul style="list-style-type: none"> <li>To operationalize this, VCS-REDD+ projects must provide documents proving land tenure in line with national legislation and jurisprudence in order to avoid tenure disputes. This requirement is important because of issues that have been reported and published here in which a State Prosecutor from Pará and researchers report that the VCS 1115 (Jari-Amapa REDD+) project contravenes Brazilian law by selling carbon credits based on an invalid claim to a 386,000-hectare parcel of land, known as Fazenda Saracura, collected and registered as public property in 2018.</li> <li>In Brazil, projects can never be approved if the inscription in the Rural Environmental Registry (nationally known as CAR) is the only document proving land tenure. Due documentation will vary depending on real estate entitlement (i.e., documents to prove ownership of private properties differ from documents proving Indigenous People possession of Indigenous Lands).</li> <li>Given the relevance and complexity of the issue, we recommend Verra to elaborate thorough lists of documents, specific for each country, that must be submitted by developers to prove that the project is developed with parties that have rights over land, including the responsible state agencies when public forests are at stake. Lists should be subjected to public consultation in each country before adoption.</li> </ul> </li> </ol> <p>#####</p> <ol style="list-style-type: none"> <li>VCS must require auditing companies or beneficiaries of carbon credits to create audits that guarantee (i) the human rights of local populations, and (ii) external whistleblowing channels must be created to forward complaints.           <ul style="list-style-type: none"> <li>This recommendation is particularly important because, as highlighted in the abovementioned technical note, the VVBs in charge of auditing REDD+ projects and their compliance with VCS safeguard standards have failed to ensure REDD+ project developers clearly and accurately documented basic elements (e.g., free, prior, informed consultation - FPIC) required for safeguards, failed to ensure developers meaningfully addressed procedural or substantive harms during the project's execution, and failed to withhold certification of projects whose safeguard violations remained unaddressed. Because understanding Brazil's context and legal specificities is not trivial to international VVB organizations, we further recommend that:               <ul style="list-style-type: none"> <li>Brazilian VVBs should be in charge of the verification and validation of VCS projects based in Brazil.</li> <li>Brazilian VVBs should not be hired directly by the project proponent. Instead, a Brazilian VVB should be withdrawn by Verra from a pool of Brazilian VVBs that are accredited to conduct the verification and validation process. Project proponents thus contribute to a common fee associated with the verification and validation process but do not directly choose the VVB due to obvious conflict of interest.</li> <li>Brazilian VVBs must publish their audit documentation in Portuguese apart from the English, both to be publicly shared in the project's page at Verra's website.</li> <li>A national whistleblowing process related to the benefit sharing must be in place for easy access by stakeholders. If it's the case, the whistleblowing process could trigger freezing the carbon crediting process.</li> </ul> </li> </ul> </li> </ol> <p>#####</p> <ol style="list-style-type: none"> <li>Safeguard-relevant risks identified in non-permanence risk reports, which are mandatory for VCS-REDD+ projects, such as risk related to tenure issues and community engagement, should not be offset by other criteria and should prompt increased levels of due diligence and monitoring from VVBs. In other words, these social risks are significant and may be the source of the current issues Brazil's prosecution offices have to deal with.</li> </ol> <p>#####</p> <ol style="list-style-type: none"> <li>VCS must require the explicit recognition of Indigenous rights as recognized in international treaties and jurisprudence (ILO Convention 169, United Nations Declaration on Rights of Indigenous Peoples, American Declaration on the Rights of Indigenous Peoples, the InterAmerican Court of Human Rights jurisprudence) and the creation of an independent accountability mechanism to clarify and bring its safeguards policy into better alignment with international best practice.</li> </ol> <p>It would not consider to be necessary any strengthening.</p>
101 Carbonext	Carbonext	Brazil	
102 Jacob Penner	The Nature Conservancy	United States	<p>•General: Project requirements should mention compliance with local laws (e.g. working conditions, regulation of pollutants) as a first step in ensuring no net harm (i.e. the bar for VCS projects should be at or above local law requirements depending on the project location).</p> <p>•Section 3.18.20 (Property Rights): A requirement should be added that local communities and indigenous peoples shall have the right to renegotiate benefit-sharing agreements and/or opt out at predetermined intervals. The VCS Program should require these agreements to specify the timing and delivery of benefits and should include documentation of benefit-sharing as a required component of project Monitoring Reports. The text should clarify that agreements provided as evidence to VVBs must be signed and should include explicit acknowledgment of any and all opportunity costs.</p> <p>•In addition to benefit sharing agreements signed by local and indigenous communities, signed agreements from these same communities demonstrating their consent to be part of the community consultation process should also be required as part of Section 3.19.6 (Free, Prior, and Informed Consent).</p>
103 ANONYMOUS #20	N/A	N/A	<p>Rule 3.18.17 3) should define 'purposes of restoration' more specifically (i.e. is this rule targeting projects that are not commercial harvesting, or is 'restoration' simply the act of planting in areas that were once forest and are being planted on regardless of the end-use of the tree).</p>

104 Bibiana Duarte	Systemica Net Zero	Brasil	<p>Yes, it is suggested to reinforce the following:</p> <ul style="list-style-type: none"> <li>-In the contributions to the SDGs (3.17.1), it should be specified that the evaluation indicators of the objectives to which the project contributes should be built, so that these contributions can be monitored.</li> <li>- 3.8.17(2) Verra shall provide guidance for using this tool (STAR) free of charge or other methodologies that can be accepted to identify threats. Other hierarchical prioritization and triangulation analyzes of information may be useful, particularly at the local level. Requiring an exclusively paid tool would add disadvantages to companies and community associations proposing projects in developing countries.</li> <li>-Regarding environmental risks to stakeholders, the identification of negative impacts and mitigation measures could be expanded to include minorities and vulnerable groups (3.18.8). Likewise, specify that the environmental assessment encompasses all components such as water, soil, air, etc. (3.18.9).</li> <li>-In ecosystem health, indicate the range to assess impacts on adjacent habitats of rare, threatened, or endangered species (3.18.16).</li> <li>-As an additional inclusion to requirement 3.19.5, it is proposed to specify the moments in which the communication of the audit processes must be made, the prior communication of the VVB visit, the dissemination of the results of the visit after it has been carried out, the possible dates to obtain the validation/verification and registration of the project.</li> <li>-In the definition of monoculture, adjust that it refers to a crop with a single species or a single population, since a population is made up of individuals of the same species.</li> </ul>
105 Sebastian Lema	Center for Clean Air Policy	Colombia	<p>Yes, it is necessary to strengthen transparency on benefit sharing with local communities (landowners). To this end, we suggest that VCS trading prices and profit-sharing between project developers and local communities should be available to the public in the project documentation and in Verra's registry.</p>
106 ANONYMOUS #22	N/A	N/A	<p>Addition of clarifying language for the project proponent and VVB interpretation and implementation.</p>
107 Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>"Proprietary Rights" can be further detailed to ensure the actual consent and participation of credit rights holders. Especially for traditional communities and indigenous peoples.</p>
108 Zimmfor	Zimmfor Management Services Ltd.	Canada	<p>3.17.1 – Where possible, project proponents should demonstrate how the project activity(s) is consistent with the SDG objectives of the host country: Please make this clearer. When does Verra consider it "possible" to demonstrate project activities are consistent with SDG objectives of the host country (i.e., only if the country has publicly stated their objectives, or only when the proponent feels like they are capable of demonstrating consistency with SDG objectives, or only when the project activities are already consistent with SDG objectives.)</p> <p>3.18.8 - The project proponent shall identify any risks related to the safety of women and girls in the local community and shall design and implement mitigation measures to protect local communities against and appropriately respond to harm to women and girls: This statement reads open ended as if the project proponent is responsible for mitigating all risks related to the safety of women and girls in the local community, including risks that would be well outside the scope of the project proponent's activities or abilities. Ex. How is the project proponent of an AFOLU project supposed to mitigate risks such as abduction or sexual assault of women and girls in the community outside the boundary of the companies and individuals involved in the project? Please adjust wording to clarify.</p> <p>3.18.15 - The project proponent and any other entity involved in the project design or implementation shall preserve and protect cultural heritage consistent with indigenous peoples and local communities practices or UNESCO Cultural Heritage conventions as part of project activities: Please provide a definition for "cultural heritage".</p> <p>3.19.12 - Stakeholders may submit comments outside of the 30-day public comment period. The project proponent shall take due account of any comments at the subsequent validation or verification process, which means it will need to either update the project design or demonstrate the insignificance or irrelevance of the comment. It shall demonstrate to the validation/verification body what action it has taken: Will there be "grace periods" for proving due account of comments that are received during a validation or verification event (i.e., when the audit is occurring) and during subsequent Verra review? For example, if a comment is received while Verra is completing a review following a verification event, will the proponent be required to prove due account at that time, or will they be given until the following verification?</p>
109 ANONYMOUS #24	N/A	USA	<p>3.18.10: Although this is not new language, it is worth noting that while the project proponent is the natural unit of concern in most of the safeguard sections because they involve policies, the language "shall not be involved in sexual harassment" is very vague. Generally, entities do not engage in sexual harassment; people do. The language here might benefit from requiring the project proponent and related entities to instead prohibit discrimination and sexual harassment, as a matter of enforced policy, among its employees and contractors.</p>

724 Sheldon Zekreski	BluEarth Carbon Development	<p><b>Safeguards</b></p> <p>I commend Verra staff on the proposed updates. The represent a necessary set of updates to ensure projects are responsive on an ongoing basis to workers, local communities, and public stakeholders. My comments focus on benefit sharing and responding to public comments outside of the 30- day public comment period.</p> <p>Section 3.18.20- The inclusion of disclosing the benefit sharing agreement is an important addition and Verra is correct in not being prescriptive in setting revenue sharing thresholds. There are many ways to define revenue sharing and it is important that requirements not be imposed in a way that could inhibit project proponents from securing capital to develop the projects and operating funds to manage projects on an ongoing basis.</p> <p>Section 3.19.12- Should Verra proceed with the inclusion of an ongoing comments section, it would be advisable to provide project proponents and validation verification bodies with time bounds for addressing public comments and guidance on when warranted changes to project design would take effect. Comments can be received at any point during a project year and could take some time to study and implement design changes if warranted. In such cases, there should be guidance around when a design change would be applicable. Would it be retroactive? Immediate upon completion of a design update by the proponent? The following project year? Such guidance will be important for nature-based projects, which could be several years between verifications.</p>
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#### 4. What resources or guidance should Verra provide to project proponents and/or VVBs trying to meet the above requirements?

Comment #	Name	Organization	Country	Comment
110	Lasse Leipola	Finnwatch	Finland	<p>As the projects in question are business operations, the section on safeguards should refer to the established guidance on corporate human rights and environmental due diligence. The global authoritative standard on business and human rights is the UN Guiding Principles on Business and Human Rights (UNGPs). Due diligence and responsible business conduct are also further elaborated in the recently updated OECD Guidelines for Multinational Enterprises and in the OECD Due Diligence Guidance for Responsible Business Conduct. All three should be explicitly mentioned, for example in paragraph 3.18.11.</p> <p>UNGPs: <a href="https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights">https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights</a></p> <p>OECD Guidelines: <a href="https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm">https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm</a> and <a href="http://mneguidelines.oecd.org/mneguidelines/">http://mneguidelines.oecd.org/mneguidelines/</a></p>
111	Livio Pierro	Face the Future	Netherlands	<p>Point 3 in section 3.18.18 is not clear to me hence would be nice if Verra can provide a scheme that clearly categorizes degraded ecosystems and addresses when and how activities can be conducted. Section 3.19.2 refers to local stakeholder consultation but does not further develop on what this consultation should entail. Therefore, a general guidance provided by Verra can be useful.</p>
112	ANONYMOUS #2	N/A	N/A	<p>Verra should assist with the development of an example project within each defined sector and provide that as an example to follow. This should be done before the standard takes effect. At a minimum, provide some faux project descriptions within each non-AFOLU sector to serve as a basis.</p>
113	Mark Ritchie	Soils for the Future and CarbonSolve	USA	<p>All of this stuff is covered in the CCB Certification Requirements - substantial additional detail is available in the VCS-CCB templates</p>
114	Eric Wilburn	NatureBridge	USA	<p>Verra should provide guidance as to the structure of the Benefits Sharing Agreement and what must be included to meet the minimum requirements. As well as guidance around the financial reporting that should be included within each verification event to demonstrate that that Benefits Sharing Agreement is being followed.</p>
115	ANONYMOUS #4	N/A	N/A	<p>3.18.20 Where the project activity impacts property rights, usage or resources, the project shall include a benefit-sharing arrangement appropriate to the local context and consistent with applicable national rules and regulations. Such arrangement shall be agreed upon by local communities and indigenous peoples, and the project proponent shall provide evidence of such agreement. The project proponent shall share the draft and final benefit sharing plan with the affected communities in a culturally appropriate manner and shall provide</p>
116	ANONYMOUS #5	N/A	N/A	<p>I understand the spirit of the safeguards section but I continue to find it contradictory and confusing. Most any project can have some negative impacts to some individuals or portion of the population. I think the guidance struggles with acknowledging this and using terms like mitigate but doesn't address when say the community is fine with certain trade-offs being made when full mitigation can't be accomplished. Or consider a biochar project which will still have some negative effects but greatly reduced smoke over ag waste being open burned instead of turned to biochar..</p>
117	ANONYMOUS #6	N/A	N/A	<p>What is the bar for the type of mitigation measure that must be implemented? What level of monitoring is required? It is unclear how Verra or verifiers will evaluate the adequacy of the new requirements around mitigation implementation.</p>

118 ANONYMOUS #7	N/A	N/A	<p>In the last few years, many developers have requested guidance on what a fair and equitable benefit-sharing agreement looks like, and what wording is appropriate within a signed contract.</p> <p>As Verra moves to incorporate benefit sharing within the VCS, guidance on how to construct these agreements is an existing need which is becoming somewhat urgent.</p> <p>A new working group led by Blue Marine Foundation and bringing together international NGOs and blue carbon credit producers is being publicly launched later this year, with the aim of identifying and addressing issues surrounding carbon rights and stakeholder equity in the blue space.</p>
119 ANONYMOUS #8	N/A	N/A	I think a separate guidance document is needed with more detail on what the requirements mean, how these can be demonstrated (e.g., what documents need to be provided), and how these will be verified. Currently the language is too vague.
120 ANONYMOUS #9	N/A	N/A	<p>FAO Manual on Free, Prior, and Informed Consent: <a href="https://www.fao.org/3/i6190e/i6190e.pdf">https://www.fao.org/3/i6190e/i6190e.pdf</a></p> <p>Mo' otz Kuxtal Guidelines: <a href="https://www.cbd.int/doc/publications/8j-cbd-mootz-kuxtal-en.pdf">https://www.cbd.int/doc/publications/8j-cbd-mootz-kuxtal-en.pdf</a></p> <p>UN Guiding Principles on Business and Human Rights: <a href="https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf">https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf</a></p>
121 Sheldon Zakreski	Independent Consultant + BluEarth Carbon Development	USA	Section 3.19.12- Should Verra proceed with the inclusion of an ongoing comments section, it would be advisable to provide project proponents and validation verification bodies with time bounds for addressing public comments and guidance on when warranted changes to project design would take effect. Comments can be received at any point during a project year and could take some time to study and implement design changes if warranted. In such cases, there should be guidance around when a design change would be applicable. Would it be retroactive? Immediate upon completion of a design update by the proponent? The following project year? Such guidance will be important for nature-based projects, which could be several years between verifications.
122 ANONYMOUS #10	N/A	N/A	For 3.17.1, there should be guidance on what conditions might make it "possible" or "not possible" to demonstrate contributions to sustainable development goals. We also recommend that for 3.18.20 there be guidance for identifying evidence that project activities have impacted property rights, usage or resources. For some project types (e.g., AUD) it is hard to imagine a project that would not meet those criteria, and so it may be simpler to just require benefit-sharing arrangements in that case.
123 Martin Camilo Perez Lara	NA	Colombia	<ul style="list-style-type: none"> <li>■ VCS must require Colombian VVBs must publish their audit documentation in Spanish apart from English, both to be publicly shared in the project's page on Verra's website.</li> </ul>
124 Kris Hendrickx	Global Evergreening Alliance	Australia	<ul style="list-style-type: none"> <li>•Definition of "existing ecosystem" (in 3.18.18) would need to be more specific. It is not clear what the scope of "existing ecosystem" is. In addition, from VCS Program Definitions, the definition of ecosystem is very broad. This is challenging for projects to determine whether it is eligible to restore a very poor ecosystem. For example, a poor farmland (degraded ecosystem) which was converted from forest for more than 10 years ago should be qualified to include in a restoration project.</li> <li>•Guidance on stakeholders and 30 days public comments (in 3.19.12) need to be provided. If stakeholders would be able to submit comments outside of the 30-day public comment period, project proponents will have to allocate resources to respond to possible non-sense comments throughout project lifetime. This includes the scenarios that they may also have to cope with sabotage comments from competitors.</li> </ul>
125 Indradeep Das	ReNew	India	<p>Reporting system/process for ecological impact assessment on the ecosystem in question;</p> <ol style="list-style-type: none"> <li>1. Explanation of Verra's validation process and its key steps, Role of validation and verification bodies ( VVBs ) in ensuring credibility and accuracy</li> <li>2. Importance of adherence to VCS standards and framework</li> <li>3. Overview of the parameters for successful validation</li> <li>4. Challenges faced by Verra in validation process, especially when aligned to IC-VCM</li> <li>5. Presentation of a case study highlighting a project with a successful validation</li> <li>6. Examination of the key factors that contributed to the project's quality submission</li> <li>7. Best practices or template for reporting on public consultation phase and clear process/documentation for public comments falling outside the first 30-day window period.</li> </ol>
126 Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Examples of suggested evidences that could be used to demonstrate compliance with the criteria would be very useful. In addition, guidance on whether compliance with other standards (for example, Net Gain biodiversity under IFC Performance Standards and FSC High Conservation Value approach) satisfies the Verra requirements, or if there are additional levels of compliance that should be attained would also be very useful.
127 ANONYMOUS #11	N/A	N/A	<p>Kindly provide us with guidance on the Categories of stakeholders that project developers must involve in the project, this will give us clarity and uniformity during implementation of the projects and between projects.</p> <p>For example, the stakeholder categories that are mentioned in the Verra's Plastic Waste Reduction Standard.</p>
128 Debora Souza	Future Carbon Group	Brazil	Provide us with any comments submitted outside the 30-days comment period.

129 ANONYMOUS #12	N/A	N/A	A guidance document with actual examples
130 Inigo Wyburd	Carbon Market Watch	Belgium	<p>Definitions needed for Ecosystem Health Safeguards:</p> <p>- We recommend making the following amendment to the definition: "Invasive Species: A non-native species whose introduction and spread by human activity either accidentally or intentionally may cause socio-cultural, economic, or environmental harm or harm to human health per the Global Invasive Species Database"</p>
131 ANONYMOUS #13	N/A	N/A	<p>As above, further guidance on benefit sharing would be welcome.</p> <p>Verra should assist project proponents in accurately quantifying the magnitude of impacts caused by their activities. Clear guidelines are needed to assist developers in determining the appropriate scale and nature of remediation or compensation efforts necessary to achieve a genuine neutral or net positive outcome.</p>
132 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	<p>3.18.20: When related to traditional and indigenous communities, ensure and evidence that it was shared and there was consent from representatives and other interested parties with legitimate powers guaranteed by statute, pre-existing contract or local law. Additionally we suggest to extend the rule to private property, ensuring that the owner is in agreement with the agreement.</p> <p>Clarify whether the term "Farmers" for ALM would have the same meaning as "landowner", i.e. who has "property rights" in the project. If yes, make it explicit. If not, we recommend keeping the term Stakeholder as it is more comprehensive and does not generate a misunderstanding.</p>
133 ANONYMOUS #14	N/A	N/A	<p>To ensure consistency between projects. Guidelines for determining negative impacts (partially available in CCB but what if project is only certified with VCS?) for new safeguard requirements, or resources on best-practices. Similarly, guidelines for identifying and respecting rights of indigenous and local communities. Should there be a general VCS-approved approach to ensure integrity? For threatened species the link for HCV/IUCN should at least be provided and be used as guidelines for determining species and developing appropriate activities to prevent loss of such species.</p>
134 STX Group	STX Group	Spain	<p>Guidance on LSC design: minimum requirements to design a LSC that is inclusive, culturally appropriate, and respectable for local knowledge.</p> <p>Guidance on SDG (Sustainable Development Goals) impact demonstration, guidance, and resources to demonstrate how the project activity is consistent with the host country SDGs' objectives.</p>
135 Márcia Silva	Ibá	Brazil	<p>Bring metrics for stakeholder consultation, determine Tools allowing the process to be conducted in a targeted way for all projects, especially if stakeholder consultation is considered in Buffer. Stakeholder consultation is very important, however the way it is conducted is very subjective, thus generating possible questions from both Verra and the project proponent.</p> <p>Determining a less comprehensive radius, as 20 km, in some cases may cover different cities. The best approach would be to establish radii within a range, with minimum and maximum values, according to the type of project and the surrounding population density. For example, large-scale conservation projects may require larger radii and projects whose area and impact are more specific, for example reforestation and restoration, may have a narrower radius. It is worth mentioning that the FSC uses radius of 3 km for stakeholder consultation. Another option would be to consider an absolute number of stakeholders to be consulted, instead of a distance, thus facilitating the accounting in the Buffer.</p>
136 Diego Toledo	re.green	Brazil	<p>Verra should develop specific guidance to meet the requirements according to the project type. Each project type may use different approaches to meet the same requirement.</p>
137 Carbonext	Carbonext	Brazil	<p>Orientation similar to CCB Standards regarding the concepts presented in the Standard Update could be a possibility, as long as overlap is avoided.</p>
138 ANONYMOUS #20	N/A	N/A	<p>If possible, more guidance on undertaking a biodiversity risk assessment would be helpful – or at least what are the minimum standards for VVB assessment– as varying degrees of assessments will be undertaken.</p>
139 Bibiana Duarte	Systemica Net Zero	Brasil	<p>-Provide guidance with examples or adjust the template with examples of completion to meet the requirements.</p> <p>-Provide also add the official link to the following resources to avoid confusion in their application.</p> <p>3.18.14: The project proponent and any other entity involved in the project design or implementation shall identify local communities and indigenous peoples as set out in Section 3.19.1 below, and recognize, respect, and promote the protection of the rights of indigenous peoples and local communities in line with applicable international human rights law, and the the United Nations Declaration on the Rights of Indigenous People and ILO Convention 169 on Indigenous and Tribal Peoples</p> <p>3.18.17: For projects that include planting or introduction of species: [...] 2) The project shall not use any species in the project activities that threaten the existence of endangered species. The project proponent shall use the Integrated Biodiversity Assessment Tool's Species Threat Abatement and Recovery Metric.</p> <p>-On the other hand, clarify what is meant by 'expert judgement' in the definitions, in order to validate and verify its application with certainty (what is needed to consider that source of information as an 'expert', years of experience? studies in the specific field? articles developed?).</p> <p>3.18.18: Activities that convert existing ecosystems are not eligible under the VCS Program: [...] 2) Such proof is not required where such clearing or conversion took place at least 10 years prior to the proposed project start date, or where the dominant land cover is an invasive species and threatening ecosystem health as demonstrated using the Global Invasive Species Database, and supporting documents such as evidence from peer reviewed literature or expert judgement [...].</p> <p>-Taking into account that Section 2.2. Internal Risks, item 4, now establishes that the adaptive management plan is mandatory, it would be good to establish the minimum content that it should embrace.</p>
140 Sebastian Lema	Center for Clean Air Policy	Colombia	<p>Verra should provide a template to provide standardized information on the benefit distribution scheme between local communities and project developers.</p>

141 ANONYMOUS #22	N/A	N/A	<p>For sections 3.18.3 and 3.18.7, how risk is assessed should be clarified. What are the steps to sufficiently assess risk in this case? Also, how are "negative impacts on the environment, employees, and local residents and communities" defined by Verra? How are "safe and healthy working conditions for employees" defined by Verra?</p> <p>For section 3.18.8, it should be limited to risks posed by the project or the project activity.</p> <p>For section 3.18.9, what qualifies as project impact? It would be helpful to provide steps and requirements for identification, assessment and mitigation efforts.</p> <p>For section 3.18.11, how will this be assessed by the VVB and Verra?</p> <p>For section 3.18.12, how is equal opportunity defined for assessment from VVB and Verra? Is this related to requirements of providing evidence of revenue sharing mechanism?</p> <p>For section 3.18.14, what qualifies as sufficient promoting?</p> <p>For section 3.18.15, how is this assessed by the project proponent during development and later reviewed by the VVB and Verra?</p> <p>For section 3.18.16, without a tool, this would be hard for VVBs to assess consistently. Does the project proponent need to carry out a biodiversity assessment with a 3rd party prior to validation? Or is referenced literature sufficient? The language "no negative impacts on ecosystems" and "will not adversely impact these areas" deviates from more commonly used No Net Harm language in VCS and CCB programs. This could cause an interpretation issue.</p> <p>For section 3.18.17 2.), can the referenced tool be used for the proposed requirement in 3.18.16?</p> <p>For section 3.18.20, while the term "benefit sharing" typically applies to project revenue, it can be interpreted to be conceptually broader. It would be good for Verra to define.</p> <p>For section 3.19.2, what is the definition of consultation in this instance? Receive and address any feedback following conversations with each stakeholder or community group? In-person or digital communications?</p> <p>For section 3.19.3, following the language of "the project proponent shall provide such summary as part of the project request at validation, verification, and crediting period renewal," would this summary be apart of the project description and monitoring reports?</p> <p>For section 2.3- Proposed Updates to the VCS Program Definitions, it seems to lack an appropriate definition for an "existing ecosystem."</p> <p>Overall, there is a need for Verra to provide clear steps for the project proponent prior to assessment from the VVB and Verra. Clear definitions of what qualifies as impact and satisfactory from the VVB and Verra review.</p>
142 Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>Verra should develop specific guidance to meet the requirements according to the project type. Each project type may use different approaches to meet the same requirement.</p> <p>3.18.20: When related to traditional and indigenous communities, ensure and offer evidence that it was shared and there was consent from representatives and other interested parties with legitimate powers guaranteed by statute, pre-existing contract or local law. Additionally we suggest to extend the rule to private property, ensuring that the owner is in agreement with the agreement.</p> <p>Clarify whether the term "Farmers" for ALM would have the same meaning as "landowner", i.e. who has "property rights" in the project. If yes, make it explicit. If not, we recommend keeping the term "Stakeholder" as it is more comprehensive and does not generate a misunderstanding.</p>
143 Zimmfor	Zimmfor Management Services Ltd.	Canada	<p>Verra needs to provide guidance on how retroactive projects (ex., IFM projects that have started 1-3 years prior to listing) are supposed to meet the requirements of Section 3.19.2. Due to the complexity of these projects, very often pre-feasibility assessments are conducted prior to listing projects publicly (especially for publicly traded companies) all while project activities have been initiated. In these cases, proponents will want to get credit for activities that they have initiated prior to having the project go public (i.e., prior to public engagement), however with the requirements of 3.19.2, this will not be possible.</p>
144 ANONYMOUS #23	N/A	N/A	<p>Verra could provide the following resources or guidance to meet above requirements:</p> <ul style="list-style-type: none"> <li>•Property rights: templates for benefit-sharing arrangements (e.g. with variation adaptation potential by project type / region).</li> <li>•No net harm: the disclose and report requirement at each verification could be amended to reflect the lead times of ERRs and environmental impacts happening.</li> <li>•Ecosystem health a): the provision of some sort of license to use the IBAT to generate the STAR metric report per project should be covered by Verra if it is to be a mandatory requirement, due to its price.</li> <li>•Ecosystem health b): further definitions could be added, e.g. agro-ecosystem. This would help define ecosystems that allow for multiple activities (currently covered by different project interventions) and multiple ecosystems.</li> <li>•Ecosystem conversion: waiving of the 10-yr prior conversion record should be reviewed based on underlying managed ecosystem conditions and underlying legal policies in place. A hierarchy of possibilities explaining the rationale for said ecosystem conversion could be provided considering country/regional circumstances.</li> <li>•Stakeholder engagement: charter on minimum requirements and guidance examples could be provided, with adaptation potential given geographies and project types.</li> </ul>

145 Joel DeBoer	EP Carbon	United States	<p>Additional guidance on how project proponents will demonstrate compliance with Section 3.18.3 will be necessary for proponents to comply with this requirement. Specifically, where the proposed update states: "The project proponent shall assess the risk of any negative impacts on the environment, employees, and local residents and communities." This proposed update to the VCS provides a requirement, but there is not a clear framework for identifying what qualifies as a negative impact. While it is understood that there will be some necessary interpretation and discretion by users (proponents and VVB), additional guidance and specificity would be valuable to readers.</p> <p>Additionally, Section 3.18.1 of VCS Standard v4.4 states: "Where projects complete a validation or verification to the CCB or SD VISa Program at the same time as a VCS Program validation or verification, they are not required to conduct a separate demonstration of conformance with the requirements set out in this Section 3.18." This language appears to have been removed from the proposed updates to v4.5. Will project proponents of CCB or SD VISa projects now be required to demonstrate compliance with safeguard requirements of the VCS in addition to the requirements of these layered on standards?</p>
146 Juliana Magalhaes	ClimeCo	Canada	I suggest Verra discloses criteria for project proponents to identify the risk related to working conditions and safety of women. Maybe, those risks could be a section included in the Risk Tool.
147 ANONYMOUS #24	N/A	USA	<p>Some of the language in the Ecosystem Health section should be clarified in order to provide better guidance on allowable activities and definitions. These include:</p> <p>3.18.17 (1): "introduce" or "allow to thrive" should refer to the introduction or allowance of organisms that are new to a given region, not necessarily a specific site. As written, this language could be interpreted to disallow the use of certain tree species for agroforestry or timber production that may already be in widespread use in the region, particularly if the species is not locally assessed for invasiveness but is considered invasive in other parts of the world. It is especially important to maintain flexibility on this point as the changing climate will have implications for which species can thrive.</p> <p>3.18.17 (3): It would be helpful for Verra to clarify that this restriction applies to restoration projects only, rather than (e.g.) commercial reforestation projects.</p> <p>3.18.18 (3): This language is not clear. If land was converted 15 years prior to the start of the project (and therefore considered degraded land), is the project prohibited from "converting the ecosystem type" that existed 11 years prior to the start of the project (i.e., degraded), or 16 years prior to the start of the project? Although the former would not make much sense, that is what the language as written seems to mean.</p>

**5. Are there other resources you think Verra should include in addition to or in place of those that we have included in our definition of invasive species?**

Comment #	Name	Organization	Country	Comment
148	Livio Pierro	Face the Future	Netherlands	GBIF Information should be generally fine and complete. Local registry and expertise should be a more up-to-date source of information. All in all, invasive species are clearly defined and I think there is no need of additional information.
149	Mark Ritchie	Soils for the Future and CarbonSolve	USA	Classifying invasive species is not the problem. The difficulty is in how a VVB would determine whether a project activity "caused" an increase in invasive species. Without doing science projects, there is no way to do that. Merely documenting invasive species presence and/or increase in association with the project activity is insufficient, as the species might be increasing for reasons not related to the project activity or as an unforeseen unintended consequence of the project activity.
150	Eric Wilburn	NatureBridge	USA	No comment
151	ANONYMOUS #4	N/A	N/A	<p>Yes. Property rights can be affected in two ways: First, Land rights are given to communities and that land is used for a VCS project (Project activities, carbon credits as a income). On the other hand, Land rights may be given as a start point of the project, so a VCS project can be done (in that case, it is a leakage management zone or leakage zone. Communities may use that land for whatever they want: livestock, agriculture, etc.)</p> <p>For the case in which land rights are given to communities so they can use it as they want and no VCS are given to that land, there shouldnt be any banafit-sharing agreement. In fact, give up land rights is the benefit sharing since they previously occupied that land without having documents or rights.</p> <p>If the land rights are given and that land will participate in a VCS program and will produce carbon credits then a benefit sharing agreement makes sense at all.</p>
152	Josiah McClellan	Land O'Lakes	United States	3.18.17.2 should not be so prescriptive. STAR is an excellent recommendation but should not be mandated. Regional analyses and assessments of local and/or indigenous experts should also be allowed to show compliance with 3.18.17.2. This will improve inclusivity and accessibility of the standard for groups that do not have access to STAR or possess the ability to translate it into their project documentation.
153	ANONYMOUS #6	N/A	N/A	More nuance should be added to point 3 of section 3.18.17 regarding the introduction of non-native monocultures for the purposes of restoration. How is "restoration" defined? For example, there are climate benefits, and most likely ecosystem benefits, of converting marginal or abandoned cropland over to pasture or hay production, which would typically involve a monoculture of a non-native species. This may or may not be classified as "restoration" depending on the point of view.
154	ANONYMOUS #7	N/A	N/A	No, but developers should be required to cite the resources they used so that Verra / VVBs can assess their relevance / accuracy as required.
155	ANONYMOUS #8	N/A	N/A	No, I think those make sense.
156	Martin Camilo Perez Lara	NA	Colombia	Fair and Equitable Deals Guide
157	Morten Pedersen	Coordinator APS	Denmark	Please be more specific and maybe with examples of what is invasive and what is not invasive.

158	Indradeep Das	ReNew	India	Maybe provide a further definition for what 'socio-cultural, economic, or environmental harm' actually means as these can have very different definitions based on contexts or stakeholders (e.g., would a net increase in economic inequalities but a overall increase of income realised represent a harm or not?)
159	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Can Verra look at harmonisation of definitions for consistency with other standards, especially the IFC Performance standard on Biodiversity and FSC HCV approach seem relevant – or provide guidance on how the Verra definition differs from other definitions.
160	Debora Souza	Future Carbon Group	Brazil	No.
161	ANONYMOUS #12	N/A	N/A	No that's enough
162	Inigo Wyburd	Carbon Market Watch	Belgium	- We recommend using the IUCN Red List (IUCN Red List of Threatened Species) as a reference for definitions of invasive species, and any other definitions related to ecosystem health.
163	ANONYMOUS #13	N/A	N/A	Upon review of Verra's VCS Program Definitions, v4.3 Shell notes that there is no official definition for non-native or invasive species. In addition, there is a lack of clarity around how naturalized species are treated, as some are non-native but invasive while others are non-native and non-invasive.
164	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	The phrase "In instances where no local or regional registries exist, the project proponent shall provide the registry used in the project documents", generates the understanding that other data sources may be used, including field data and/or local questionnaires. However, it would be important to verify this point, since the understanding is not clear.
165	ANONYMOUS #14	N/A	N/A	All references to all sources of definitions should be transparently documented. IUCN should be cited in the standard for endangered and threatened species.
166	STX Group	STX Group	Spain	National catalogs for exotic and invasive species developed in the host country, if any.
167	Márcia Silva	Ibá	Brazil	It is important to correlate the concepts of invasive species, native species, and non-native species in order to avoid confusion during the elaboration of projects. Considering what was pointed out in section 3.18.17 of the public consultation document, it would be interesting to mention that firstly it should be assessed in a jurisdictional record and then in the Global Invasive Species Database. Furthermore, it should be considered that the use of widely implemented and adapted exotic species should not be considered invasive species. For example, Pinus sp, which is considered an invasive species in Brazil, is used in the Brazilian forestry sector, in a sustainable way, bringing benefits that should be considered. Thus, it is necessary to adapt the concept of invasive species and not limit their use for the development of projects.
168	Diego Toledo	re.green	Brazil	Verra should include studies (monography, dissertation, thesis, scientific peer-reviewed, government, reliable institutions documents, etc) and expert opinion that provide evidence of species invasive behavior a reliable information resource.
169	Carbonext	Carbonext	Brazil	Not that we are aware of.
170	ANONYMOUS #20	N/A	N/A	No comment
171	Bibiana Duarte	Systemica Net Zero	Brasil	In the definition of invasive species, in addition to the global database, it could also be extended to scientific, regional, or local literature or databases that demonstrate the damage caused by the introduction of species.
172	ANONYMOUS #22	N/A	N/A	For section 3.18.17 1.), the language "allows an invasive species" is only applicable to planting and introduction? Invasive species proliferate all landscapes. Not the project proponent's duty to manage pre-existing invasive species unless that's part of the activity. Cheatgrass or other invasive grasses comes to mind.
173	Carla Zorzanelli	NBS Brazil Alliance	Brasil	Verra should include studies (final paper dissertation, thesis, scientific peer-reviewed, government, reliable institutions documents, etc) and expert opinion that provide evidence of species invasive behavior a reliable information resource.  Also, the sentence "In instances where no local or regional registries exist, the project proponent shall provide the registry used in the project documents", generates the understanding that other data sources may be used, including field data and/or local questionnaires. However, it would be important to verify this point, since the understanding is not clear.
174	Zimmfor	Zimmfor Management Services Ltd.	Canada	No
175	ANONYMOUS #23	N/A	N/A	where locally available and reliable sources exist, these should be considered as valid overlays to the general Integrated Biodiversity Assessment Tool's Species Threat Abatement and Recovery Metric.
176	ANONYMOUS #24	N/A	USA	The definition of invasive species as one that "may cause" harm is probably too broad; this could be open to a very wide number of interpretations that may or may not be intended. We would suggest changing this definition to "does cause" harm; some non-natives are benign in their new landscapes and may serve important purposes in restoration activities (for example, as short-lived pioneers to improve soil health for later native plantings).

6. Do you think that jurisdiction-level classification of invasive species should supersede global databases or vice versa?				
Comment #	Name	Organization	Country	Comment
177	Livio Pierro	Face the Future	Netherlands	This could depend on the context, more specifically on how strictly is the scrutiny of invasive species operated by jurisdictions. It is of course safer to choose the most conservative classification unless there is clear proof that a species is not invasive at the jurisdictional level.
178	ANONYMOUS #1	N/A	N/A	"Invasive Species" definition may be problematic, especially for sustainable agriculture projects. The most transformative (positive) landscape restoration practices use species that are considered by various governments or organizations as invasive species (such classification often made in the absence of substantive evidence of ecological harm). Permaculturist Geoff Lawton, the preeminent expert on the subject, advocates for incorporating many such species for landscape restoration and sustainable agriculture. This is a tricky topic to navigate. Perhaps allow projects to use species classified as invasive species if they already exist in the region the project is located in. Usually once non-native species become established in an area, control can not be achieved. Rather than battle these species at significant cost, it may be desirable to learn to live with these species.
179	Mark Ritchie	Soils for the Future and CarbonSolve	USA	Absolutely - one country's (or even region's) favorite plant is another country's (or region's) worst invasive species
180	Eric Wilburn	NatureBridge	USA	No comment
181	ANONYMOUS #4	N/A	N/A	Jurisdiction-level classification of invasive species should supersede global databases
182	ANONYMOUS #5	N/A	N/A	Why not make it inclusive of both? Additionally: 3.18.18 could benefit from a rewrite. It is confusing to talk about "existing ecosystems" and I don't know what para 1) is saying. In general Verra should overhaul standards that allow planting regarding use of species to clarify whether the intent is ecosystem restoration or planting for production (e.g., timber) as these are often confused by PDs and claims (within PDDs) made that exotic, invasive, monoculture projects are some kind of ecosystem restoration are profuse among Verra projects. The vast such plantations of the Llanos of Colombia/Venezuela demonstrate that one can limit soil disturbance to <10% by pit planting eucalyptus 4m apart and completely transform a savannah ecosystem while keeping within the rules. In that case, a metric for change to canopy cover would be much more informative than soil disturbance.
183	Josiah McClellan	Land O'Lakes	United States	Jurisdiction-level classification should supersede global databases. The proposed order of priority (local, regional, global) should be preserved.
184	ANONYMOUS #6	N/A	N/A	The current guidance of prioritizing local resources first is the appropriate approach. It is important that the project proponent be allowed to consider not only simple lists, but also accompanying guidance regarding management of certain species. For example, it may be possible to use a species that is considered invasive in a global database if that species is managed according to more local guidance such that the risk of invasion is mitigated.
185	ANONYMOUS #7	N/A	N/A	If a non-native species is classified as invasive or noxious by either jurisdictional or global databases, then it should be regarded as such by the project developer. i.e., both should be consulted and the list of species identified combined. Species which are on the global list, but not the jurisdictional list, should then be subject to risk assessment. This avoids risk that a jurisdictional level database will not include potentially invasive species which have not yet been identified / assessed as a hazard within that region.
186	ANONYMOUS #8	N/A	N/A	I think jurisdiction should be the first choice
187	Kris Hendrickx	Global Evergreening Alliance	Australia	Jurisdiction-level classification of invasive species and global databases have an important role to play and should be valued as such. Global databases normally depend heavily on peer reviewed papers and are based on robust scientific based assessments. However, due to changing of the environment, such as climate change, a species that is assessed as non-invasive species today may be invasive species in the future and vice versa. Jurisdiction-level classification of invasive species is usually based on the assessment of negative impacts of species on local ecosystems. Thus, there should be an option for either using of jurisdiction-level classification or global databases where it is appropriate, update and suitable for project context.
188	Indradeep Das	ReNew	India	National level jurisdiction should supersede global database in project implementation as local knowledge on environmental and biodiversity matter is hardly captured by global assessment.
189	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Jurisdiction-level resources should generally be the preferred option over global databases. Local resources and local knowledge will always be better suited to the local context than global databases.
190	Debora Souza	Future Carbon Group	Brazil	The most strict one should be used, or maybe a combination of the two available databases.
191	ANONYMOUS #12	N/A	N/A	Yes
192	Inigo Wyburd	Carbon Market Watch	Belgium	- It depends on the conservativeness of the respective classification. Preference should be given to the jurisdiction-level classification if more species are listed there than in a global database and vice versa. This is because the jurisdiction-level classification is subject to changes that can be of political nature.
193	ANONYMOUS #13	N/A	N/A	Shell supports both outcomes. The most conservative option is to assume the species is invasive if EITHER the jurisdiction-level OR the global database identifies the species as invasive (i.e., whichever one, if any, identifies the species as invasive, that level supersedes the other).  In both cases it is important to recognize and support local on-the-ground knowledge.

194	Caio Gallego	Biofilicia Ambipar Environmental Investments	Brazil	In the absence of a national database, other databases are important, as long as they reference the country or region in which the species is classified as invasive.
195	ANONYMOUS #14	N/A	N/A	To remain country-specific, jurisdictional classifications should supersede global datasets.
196	STX Group	STX Group	Spain	Global databases are sometimes not as accurate as a jurisdiction-level classification, so yes, when existing, a national, regional, local classification should be used instead of a global database. Nevertheless, minimum requirements definition would be needed for national, regional, and local databases to be used as resources in the projects.
197	Márcia Silva	lbá	Brazil	In the case of jurisdiction-specific information, it should be considered a priority as it considers specific aspects of each biome/ecotone. If relevant jurisdiction-level information is unavailable, global data should be used.
198	Diego Toledo	re.green	Brazil	The most reliable data must be used. For example, if a species is not categorized as invasive by GBIF, but there are local studies presenting evidence that in a particular region the species is invasive, then this information should be used.
199	Carbonext	Carbonext	Brazil	Jurisdiction-level classification of invasive species should supersede global databases, given that local information usually represents better local reality.
200	ANONYMOUS #20	N/A	N/A	Yes – ideally, a jurisdictional classification should supersede global databases. However, if the species in question is listed on a global database and not on a jurisdictional level, this should take precedence unless a justification is provided.
201	Bibiana Duarte	Systemica Net Zero	Brasil	It is not to replace one database with another, but to prioritize and that the different scientific databases complement each other.
202	ANONYMOUS #22	N/A	N/A	For section 3.18.17 1.), is it really the project proponent's responsibility to identify and control for/not allow invasive species in the area? One thing is to not allow for introduction or use of invasive species as part of project activity; the other is to require the identification and control of such species.  And yes, if appropriate and accurate, using a regional or local reference (expert or peer reviewed literature) should supersede a global database.
203	Carla Zorzaneli	NBS Brazil Alliance	Brasil	We think that the most reliable data must be used. For example, if a species is not categorized as invasive by GBIF, but there are local studies presenting evidence that in a particular region the species is invasive, then this information should be used. In the absence of a national database, other databases are important, as long as they include the reference of the country or region in which the species is classified as invasive.
204	ANONYMOUS #23	N/A	N/A	Yes.
205	Juliana Magalhaes	ClimeCo	Canada	I think it can supersede if it the jurisdiction-level classification has a more recent update. In other words, the latest updated classification should prevail.
206	ANONYMOUS #24	N/A	USA	Jurisdiction-level classification should supersede global databases. The degree to which a species is "invasive" is highly dependent on local conditions; local-level data and classification should be preferred.

#### 7. What are the risks or benefits of prioritizing local, national, and regional classifications over international GBIF?

Comment #	Name	Organization	Country	Comment
207	Livio Pierro	Face the Future	Netherlands	I think projects should strive to have as much as locally derived data as possible. However as mentioned GBIF could be a more strict therefore safer approach.
208	Mark Ritchie	Soils for the Future and CarbonSolve	USA	More local data may miss some species or be poorly updated. Maps of the distribution of the invasive species may be inadequate.
209	Eric Wilburn	NatureBridge	USA	No comment
210	ANONYMOUS #4	N/A	N/A	Benefits: Deeper local context understanding
211	ANONYMOUS #7	N/A	N/A	There is a risk that potentially invasive species may not have been assessed under jurisdictional classifications, so prioritizing them over global definitions creates a loophole where invasive species may be introduced despite all precautions having been observed. See comment above.
212	ANONYMOUS #8	N/A	N/A	Data quality and consistency between projects. If a species is listed in a local database but not in the GBIF, there could be gaming. But local databases could be more specific and include species that would be missed due to the larger scale of the GBIF
213	Indradeep Das	ReNew	India	Local classifications are usually closer to local people and communities living in those ecosystems, and drawing their livelihood off them. Global assessments are helpful to make sure the on-the-ground implementation of the project is in line with global information points. It should not, however, represent deterrent for enhancing local knowledge and realising a more ecosystem-based approach to initiate project development and implementation. The focus should be on global problems (climate, biodiversity loss, etc) and local solutions.
214	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	A key issue is the lack of availability of local or national classifications. We would therefore prefer an escalation ladder that a higher level is used when a more local one is not available.  Project proponents should also be allowed to use a more international source if they can provide proper justification for that. Perhaps Verra can provide guidance on what are acceptable justifications.
215	Debora Souza	Future Carbon Group	Brazil	While local views do have the benefit of a better understanding the local situation, local institutions may fall pray to economic and political interests that project funds may attract causing risks and distortions.
216	ANONYMOUS #12	N/A	N/A	In the case of invasive species local context is critical, using only global datasets should only be relied upon if there are no local datasets

217 Inigo Wyburd	Carbon Market Watch	Belgium	<p>We believe that both jurisdictional-level classification of invasive species and global databases should be considered when conducting analysis of invasive species. Both approaches have advantages and disadvantages, the most appropriate approach may depend on project specifics e.g. project size and scale, regional considerations, project overlap with more than one jurisdiction or nation, data availability and level of detail and expertise in invasive species management.</p> <p>Jurisdictional level Classification:          Pros: Specific and local relevance as outlined below.</p> <ul style="list-style-type: none"> <li>- Specific: Jurisdictional-level classification enables a more accurate and site specific understanding of invasive species dynamics within the project's geographic region.</li> <li>- Management: Jurisdictional classification allows for more specific management strategies that correspond and align with a geographic location's unique and particular ecological conditions.</li> <li>- Local and Regional Expertise: Using jurisdiction-classification can take advantage of the local and regional expertise of conservationists and researchers who have the most understanding and knowledge of the region's ecological dynamics.</li> </ul> <p>Cons:</p> <ul style="list-style-type: none"> <li>- Availability of Data: Depending on the region and area, data availability on invasive species at a jurisdictional-level may be scarce or not available.</li> <li>- Compatibility: Projects that are present in more than one jurisdiction or country may have conflicting and not compatible data making it difficult to compare invasive species impact and management practices.</li> </ul> <p>Global Database:          Pros:</p> <ul style="list-style-type: none"> <li>- Standardised: Using global invasive species databases provides a consistent standardised approach to accurately identify and manage invasive species in different regions of the world.</li> <li>- Wide-reaching: Global datasets give a global understanding of invasive species patterns and dynamics.</li> <li>- Access: The availability of global datasets tend to be publicly available, making it easy for project developers to access relevant information.</li> </ul> <p>Cons:</p> <ul style="list-style-type: none"> <li>- Lack Data: Some invasive species may not be present on global databases, and data on management practices may be scarce and lack detail.</li> <li>- Generalised data: Data from global databases may be too general and not specific enough.</li> </ul> <p>We believe project developers should consider both jurisdictional level classification datasets as well as global datasets in order to make the most informed and effective decision to address invasive species.</p>
218 ANONYMOUS #13	N/A	N/A	<p>While prioritizing local information is crucial, it is important to acknowledge the potential risk involved. In some cases, the information available about invasive species may not be up to date, which can complicate the auditing process.</p> <p>For instance, the project proponent may claim that no invasive species are present or used based on local information, while global databases indicate the presence or invasive nature of those species within the project area. This situation raises the question of how an auditor can arrive at a definitive conclusion while adhering to the requirement of prioritizing local information.</p>
219 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	The benefit is to classify the species according to the local reality, bearing in mind that some species may be invasive in some places and not in others (hence the caveat/risk in using global bases).
220 ANONYMOUS #14	N/A	N/A	Species of economic importance may be classified as invasive under jurisdictional classifications due to external and historical circumstances and may prevent inclusion of high value species.
221 STX Group	STX Group	Spain	There are some countries that have developed accurate and based on multiple year data on the ground invasive and exotic species catalogs, which are periodically updated. This kind of data are more precise and rigorous than a global database (e.g., Spanish Catalog of Invasive Alien Species). Depending on the country and the resources the existing national/regional/local database could not be as rigorous or precise as needed, that is why the definition of minimum requirements to use these kinds of database is needed.
222 Márcia Silva	lbá	Brazil	The main risks regarding GBIF are the data sources that are often not official or scientific. Priority should be given to official data. Considering that there are differences between the classifications of species considered invasive depending on the analyzed location, that is, a species can be considered invasive in one location and not in another; the prioritization brings the benefit of having these differences considered.
223 Diego Toledo	re.green	Brazil	We suggest that should not exist a prioritizing rule, but project proponents may use the best information available, and the VVB will judge the reliability of the source that provided the evidence.
224 Carbonext	Carbonext	Brazil	If there is a risk, it could be minimized if the standard requires official documents and peer-reviewed papers as a source of information.
225 ANONYMOUS #20	N/A	N/A	The risk is cherry picking the source that absolves the project proponent from complying with the rule unless Verra provides clarity on this point.
226 Bibiana Duarte	Systemica Net Zero	Brasil	Benefits of global databases is the extent of the availability of information, which can be supported by local studies in the project region.
227 ANONYMOUS #22	N/A	N/A	There needs to be a clear process for VVB and Verra interpretation so that the most appropriate and accurate classification can be utilized.
228 Carla Zorzaneli	NBS Brazil Alliance	Brasil	The benefit is to classify the species according to the local reality, bearing in mind that some species may be invasive in some places and not in others (hence the caveat/risk in using global bases). We suggest that there should not exist a prioritizing rule, but project proponents may use the best information available, and the VVB will judge the reliability of the source that provided the evidence. If there is a risk, it could be minimized if the standard requires official documents and peer-reviewed papers as a source of information.
229 ANONYMOUS #23	N/A	N/A	prioritizing local, national and regional classification may emphasize culturally significant biodiversity values over that globally perceived.
230 Juliana Magalhaes	ClimeCo	Canada	I think the risk is having species listed in one classification only. For example, one species is not listed in local classification, but it is listed in an international classification, or vice-versa.

231 ANONYMOUS #24	N/A	USA	GBIF provides large, interoperable, and well understood global datasets that are helpful for understanding global trends, but not necessarily helpful for understanding a species in a given context. Local, national, and regional classifications are more specific.
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<b>8. Will the requirements around land conversion or clearing prevent the development of a specific project type? Is the 10-year interval too long? Or too short?</b>				
<b>Comment #</b>	<b>Name</b>	<b>Organization</b>	<b>Country</b>	<b>Comment</b>
232	Livio Piero	Face the Future	Netherlands	As mentioned, section 3.18.18 is not clear to me, and I believe should be reformulated. I cannot therefore reply to this question.
233	Mark Ritchie	Soils for the Future and CarbonSolve	USA	Already this requirement prevents projects oriented around restoration of agricultural or mining lands. The risk of gaming (disturbing lands for the purpose of restoring their carbon stocks) is very low due to the low prices associated with carbon, and the opportunities for widespread sequestration from areas we already know were converted to cropland for non-carbon-market reasons are vast.
234	Eric Wilburn	NatureBridge	USA	Depends on the drivers of deforestation. If it is unplanned deforestation completed by individual smallholder farmers, than the 10-year period is too long, as it is highly unlikely there is deforestation with the intention to take advantage of a reforestation project. But will large planned or commercial deforestation, the 10-year period is necessary to remove any incentives for bad actors.
235	ANONYMOUS #5	N/A	N/A	I'd like to see land restored as soon as possible after a clearing disturbance, however it came about. I think the narrow case Verra is trying to prevent (maybe there are others) of keeping a timber company from clearcutting and then getting credits for replanting another plantation for clearcutting can be handled by restricting crediting for that activity (commercial timber monoculture plantations). Investors are clamoring for high quality, native, ARR projects--let's promote those instead.
236	ANONYMOUS #6	N/A	N/A	10 years is sufficient to avoid incentivizing land conversion for the purposes of a carbon project. Going longer than 10 years risks reduced data availability.
237	ANONYMOUS #7	N/A	N/A	Allowances need to be made for sea level rise or regional changes in rainfall / water availability which prevent the restoration of the assemblage of flora which existed on the project site ten years prior.  For example, ten years ago the landward edge of mangrove may have given way to terrestrial forest, but after ten years may now be too saline for that system to be restored, but would suit mangrove species. This should be excluded from the definition of ecosystem conversion. The project developer should be able to prove these changes by providing groundwater salinity data, or elevation / sea level rise data.
238	ANONYMOUS #8	N/A	N/A	No, 10 years make sense. However, the 10 year rule is unclear when you are referring to grouped projects. Can new instances be included after the start date that did not comply with the 10 year rule at the project start date but that comply with it in a later date? Do they need to demonstrate that it was not with the purpose of creating credits?
239	Indradeep Das	ReNew	India	It looks like an apt requirement to incentivise the best possible environmental additionality of the project. For agroforestry, ALM, this becomes important. For example, if forests are cleared on hillsides for agriculture purpose, the area might get prone to landslides and floods. At the same time, Well-funded protected areas can conserve forests with high carbon and biodiversity stocks, such as those in tropical latitudes. In working forests, sustainable harvesting and community management can prevent losses while benefitting people. Degraded and abandoned farmland can be planted with native trees or helped to regenerate naturally.
240	Giuliano Ramos Alves	Associação Brasileira do Agronegócio (ABAG)	Brazil	The conversion or area opening requirements will prevent the development of projects in some countries, such as Brazil, for example, since they do not take into account the existing environmental laws.  Carbon protocols are a source of financial incentives for farmers to adopt more sustainable agricultural management and can be an important driver of increased adoption of regenerative agriculture practices. In this way, greater adoption of the VCS protocol in South America, especially in Brazil, a country with great potential for carbon sequestration in agriculture, depends on compliance with current environmental laws. In addition, considering the existing challenges, already raised by other initiatives such as the Cerrado Protocol, the Amazon Protocol, can be an important path, since these initiatives sought not only to establish compliance rules, but also to understand the existence and availability of a reliable database, which would serve as a basis for the verification process. Therefore, there is a need for the VCS protocol to be consistent with the local reality, environmental laws and other existing initiatives, allowing greater participation of farmers in South America, with emphasis on Brazil.
241	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Yes, potentially this could affect a lot of project type, but really it depends on how we should interpret the proposed changes, which are currently not clear.
242	Debora Souza	Future Carbon Group	Brazil	No comments.
243	ANONYMOUS #12	N/A	N/A	The 10 year period is somewhat arbitrary, but in many respects, the longer the period, the less chance there is that bad actors clear land to generate income from the land clearing activity just to follow it up with a carbon project to generate more income. In the other hand, and depending on the case, we may lose time to start restoration on the ground. Has VERRA identified cases when forest was cut to start carbon projects 5 years after clearing date?
244	ANONYMOUS #13	N/A	N/A	Shell supports the continued use of the 10-year interval and does not see this requirement preventing the development of any specific activity. It is recommended that Verra update the language used to include natural ecosystem conversion, not just land conversion, in addition to land clearing (i.e., deforestation).

245 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	<p>3.18.18 2): In the case where a project carries out the carbon removal activity through the restoration of an original ecosystem where the activity consists of the removal of invasive species. Will emissions related to the removal of the invasive species continue to be conservatively accounted for or not? If the removal of these species has no relation to the project activities, is carried out independently and before the project start date, the emissions from this removal should not be accounted for in the baseline emissions of the project. Suppression management to contain invasive species does not guarantee the ecological restoration of the area and the additionality of the project can be proven.</p> <p>3.18.17.3) The requirement "The project shall not introduce non-native monocultures for the purpose of restoration" should be better detailed. Clarity about this criterion is lacking in ARR projects. How would this requirement apply to activities considered "afforestation" and how would it apply to activities considered "reforestation"?</p> <p>Suggestion: make an exception for small-scale plantations using non-native species.</p>
246 ANONYMOUS #14	N/A	N/A	<p>The requirement for land conversion should be constrained within a certain period. How far back in time does a project proponent/developer need to look back to determine what the native ecosystem was, between 10 and 50, 75, 100 years? Does the project proponent need to potentially consider native ecosystems from more than e.g, 50-years ago, which depending on changes in climate and land suitability, may not be possible to restore effectively anymore? Could guidelines on determining the native ecosystem, or the definition of a native ecosystem, be defined in such a way that makes it easier to determine what the native ecosystem should be? If an area was forested 150 years ago and has since been classified as grassland, would the ecosystem be defined as a degraded (deforested) ecosystem, or would it be a native (or potentially degraded) grassland? The 10-year interval is commonplace in terms of land clearing, as a minimum look-back period this is fine but as stated above, a threshold in terms of how far back in time one should consider native should be provided. Additionally, what is the justification for the 10-year period? Is it related to legacy periods provided initially by the CDM?</p>
247 STX Group	STX Group	Spain	<p>3.18.18 3) The requirement could prevent the development of some project types, for example, an ARR (Afforestation, Reforestation and Restoration) project that is implemented in a land that ten years prior was a grassland or shrubland, and it is considered as degraded in the host country; or a Cropland and Grassland Land-use Conversions could be considered as ecosystem conversion. Clarification is needed between native and degraded ecosystem concepts.</p> <p>A 10-year interval is appropriate.</p>
248 ANONYMOUS #15	N/A	N/A	<p>The conversion of ecosystems considering the last 10 years will limit the development of projects, since it does not consider some legalized changes, such as authorized deforestation in ecosystems, according to parameters established by government agencies. In Brazil, for example, the Brazilian forest code determines conversion rules, and considers that some conversions can be carried out. Some initiatives present in the country, such as the Cerrado Protocol, have already discussed this topic of conversion of areas, and sought to harmonize the criteria for environmental assessment, creating a monitoring standard, which stimulated its adoption. Initiatives such as this one, can be a relevant inspiration for VCS. Carbon protocols are an important source of financial incentives, which can be a major driver for greater adoption of sustainable agricultural management, on rural properties in the country.</p>
249 Lynn Riley	American Forest Foundation	United States	<p>We support the 10-year interval.</p>
250 ANONYMOUS #16	N/A	N/A	<p>In our opinion, Safeguard 3.18 should be defined more specifically. Ecosystem Conversion is not allowed for ALM projects, but the suggested definition of the Ecosystem Conversion is quite broad, and includes e.g. other project activities which impact the ecosystem. E.g. VCS methodology VM0042 allows a one-time conversion from grassland to cropland or vice versa under certain conditions for project implementation. Agoro Carbon welcomes more guidance from VERRA in regard to the definition of the ecosystem conversion, including the guidance over which timeframe such ecosystem conversion shall be assessed.</p>
251 Márcia Silva	Ibá	Brazil	<p>The 10-year interval is appropriate, avoiding possible perverse incentives for deforestation in order to implement credit generation projects soon afterward. If an area was deforested 10 years ago and it still hasn't recovered, human actions will be necessary for it to play its social/environmental role again.</p>
252 Diego Toledo	re.green	Brazil	<p>The 10-year interval is enough. Longer periods could discourage or be unfeasible for ARR projects, in particular those occurring in ecosystems highly threatened by current deforestation rates, as Brazilian Amazon.</p>
253 ANONYMOUS #18	N/A	N/A	<p>As mentioned in the response to the question 2), the new requirement around land conversion, taken literally, would make a large share of ARR projects, including all afforestation projects, ineligible. We need a clarification of what "existing ecosystems" mean and if, for example, the conversion of degraded farmland into forested land is included. In case native forests were converted long ago into farmland, and this land is now barren or overgrown with shrubs, would ARR activities on this land be eligible? If not, why so, and where would ARR activities be eligible?</p>
254 WWF-Brazil	WWF-Brazil	Brazil	<p>For the Amazon, 10 years is definitely too short.</p>
255 Carbonext	Carbonext	Brazil	<p>Not that we are aware of.</p> <p>The 10-year interval seems appropriate.</p>
256 Jacob Penner	The Nature Conservancy	United States	<ul style="list-style-type: none"> <li>•The requirement in Section 3.18.18 that activities that convert existing ecosystems are not eligible is directly at odds with Applicability Condition 3 in the recently published v2 of VM0042 – Methodology for Improved Agricultural Land Management. The Applicability Condition allows for a "one-time conversion from grassland to cropland or vice versa where it is demonstrated that project lands in the baseline scenario are degraded and the introduction of improved land use change practices would significantly improve soil health." These conflicting statements should be reconciled.</li> <li>•Condition 3 in Section 3.18.18 is confusing and perhaps contradictory. As currently proposed, lands that have been degraded for more than 10 years would not be allowed to be converted and restored to the native ecosystem that existed prior to degradation. Perhaps a change of phrasing to something like 'Lands that are considered degraded shall be converted only to the ecosystem type that existed prior to degradation' would be clearer.</li> </ul>

257 ANONYMOUS #20	N/A	N/A	<p>As the rule reads, the requirements of land conversion may inhibit the development of Afforestation on (degraded) grasslands, unless further clarification is provided.</p> <p>The new wording now removes the risk of varying levels of interpretation for projects to be exempt of the 10-year clearing rule as long as 'areas were not cleared to create GHG credits'. The previous rules left varying levels of justification and exemptions that depended greatly on the VVB's read.</p>
258 Bibiana Duarte	Systemica Net Zero	Brasil	A 10-year interval is consistent for land conversion assessment
259 ANONYMOUS #21	N/A	N/A	<p>too long. The parameters considered in land conversion and clearing areas will indeed prevent the development of projects, since they do not consider existing challenges in some countries In Brazil, for example, deforestation is a historical challenge, however, good initiatives, such as the Amazon and Cerrado Protocols, have already discussed the topic, and sought to harmonize environmental assessment criteria, creating a monitoring standard, which encouraged the adoption These initiatives can be relevant inspirations for VCS, regarding existing challenges, established rules and monitoring standards In addition, local environmental laws and global discussions on sustainable agricultural production should also be considered All of these, added to other incentives sources, such as carbon protocols, are means of changing the scenario towards agriculture without conversion or deforestation, with high adoption of sustainable agricultural practices.</p>
260 ANONYMOUS #22	N/A	N/A	<p>For section 3.18.18 3.), if the land is considered degraded, then the conversion of the ecosystem type which existed at least 10 yrs prior might be beneficial. Correct? An example would be an existing ecosystem type is degraded grasslands (introduced, non-native, highly altered landscape. The project activity WILL convert the ecosystem type that existed in the last 10 years and bring it closer to its native state (forest). Additionally, the language of "the project activity will not convert the ecosystem type which existed at least ten years prior" defies conventions of ecological restoration. Most systems have changed dramatically from their historic past, especially in the past 100-200 years. An ecosystem existing 10 years prior to start date could be incredibly problematic (for example: shrub dominated vs grass dominated). Again, the demonstration of the ecosystem type at baseline being degraded and not cleared for at least 10 years prior seems to be highly problematic.</p> <p>Too long and there should be an allowance for a justification if less than 10 years. The requirement prevents the development of projects aimed at restoring or regenerating ecosystems (native or not) that have been converted recently, where such conversion was not created with the intention to generate GHG benefits. Examples include mangrove or forest recently cut-down or burned for various reasons that do not include generating GHG benefits. For an example ARR project, such requirement excludes farms that have had different land-uses and land-cover within the last 10 years, such as pastureland and planted commercial Eucalyptus forests, which are now conducting the last harvest cycle of their Eucalyptus productive forests.</p>
261 Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>The 10-year interval is enough. Longer periods could discourage or be unfeasible for ARR projects, in particular those occurring in ecosystems highly threatened by current deforestation rates, such as the Brazilian Amazon.</p> <p>3.18.18 2): In the case where a project carries out the carbon removal activity through the restoration of an original ecosystem where the activity consists of the removal of invasive species. Will emissions related to the removal of the invasive species continue to be conservatively accounted for or not? If the removal of these species has no relation to the project activities, is carried out independently and before the project start date, the emissions from this removal should not be accounted for in the baseline emissions of the project. Suppression management to contain invasive species does not guarantee the ecological restoration of the area and the additionality of the project can be proven.</p> <p>3.18.17.3) The requirement "The project shall not introduce non-native monocultures for the purpose of restoration" should be better detailed. Clarity about this criterion is lacking in ARR projects. How would this requirement apply to activities considered "afforestation" and how would it apply to activities considered "reforestation"?</p> <p>We suggest making an exception for small-scale plantations using non-native species.</p>
262 ANONYMOUS #23	N/A	N/A	<p>waving of the 10-year prior commitment for activities that contribute to ecosystem conversion may be beneficial in jurisdictions where ecosystem conversion is deemed to have environmentally positive (while socio-economically non-detrimental) outcomes. It would also be highly recommended to consider exceptions where there is a legal right to convert ecosystems (e.g Brazil's legal deforestation policy) in particular when converted areas falling within the geographical boundaries of a proposed Project are not directly relevant to the proposed project activities. Clarification on how to manage (legally or not) converted ecosystems within an ALM projects' geographical boundaries is needed.</p>
263 Juliana Magalhaes	ClimeCo	Canada	<p>I think the writing on item 3.18.18. 2) is confusing. I think that project proponents should provide evidence of the project area land cover 10 years prior to project start date through aerial imagery. If land cover is not similar, justification should be provided.</p> <p>It is confusing on 3.18.18 1) what the cut-off period is that project areas should not be cleared of existing ecosystems. Will natural disturbances be an exception? Does the writing on 3.18.18 1) mean that if a project area ecosystem was cleared because of a natural disturbance, then the project will not be eligible for registering with Verra?</p>

264 ANONYMOUS #24	N/A	USA	<p>New requirements could prohibit certain restoration activities. A ten-year interval may not be appropriate in all situations (possibly too short in some cases and too long in others); this interval is better left to specific methodologies to be informed by experts in the particular dynamics underpinning the project area. We would suggest applying the more nuanced approach of the ARR methodology: Where the slope of a linear regression of stocking index values (see Appendix A) from time t-10 to 0 is significant and negative, clearing of pre-existing biomass is indicated and the burden of proof is on the project proponent to demonstrate that the clearing did not take place to create GHG credits, by providing evidence indicating that:</p> <p>a) prior clearing was the result of natural disturbance such as fire, hurricanes or floods (e.g. aerial imagery), or                  b) prior clearing was conducted for a purpose not to create GHG credits (e.g. evidence showing that consideration of carbon finance, e.g. initiation of a feasibility study or first communications with a carbon project developer, post-dated the clearing event, or evidence from community surveys that there was little local knowledge or engagement on carbon projects at the time the clearing took place), or                  c) prior clearing was conducted by actors other than the project proponent (e.g. evidence, such as community surveys or law enforcement records, showing that clearing was conducted in the process of land invasion by external actors, or that clearing took place when the project area was under ownership by an actor other than, and unrelated to, the project proponent).</p>
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**9. Does the definition of ecosystem restrict activity types, such as agricultural land management (ALM)?**

Comment #	Name	Organization	Country	Comment
265	Livio Pierro	Face the Future	Netherlands	The definition is quite general and allows of the inclusion of all the systems, including agroecosystems.
266	Mark Ritchie	Soils for the Future and CarbonSolve	USA	<p>3.18.16 The project shall not negatively impact terrestrial and marine biodiversity and ecosystems. ...</p> <p>This is impossible to reasonably demonstrate or even quantify for ANY project. What constitutes harm to an ecosystem? The decline in abundance of one or more species? Changes in rates of nutrient cycling? For example, if trees are planted and insect species that like open habitats decline, does that represent "harm" to an ecosystem? If perennial grasses are restored and certain seed-eating rodents decline in abundance, does that represent "harm" to an ecosystem. Or alternatively, if fire returns to an area after restoration but is properly assessed in carbon accounting, does that represent harm to an ecosystem?</p> <p>"Harm" is a subjective term and project changes viewed as positive by one stakeholder may be viewed as "harm" by another. Further, without measuring a multitude of different variables (N cycling, productivity, species diversity, energy flow through food chains, etc) how can project proponents demonstrate that they will not or have not "harmed" the ecosystem?</p>
267	Eric Wilburn	NatureBridge	USA	No comment
268	ANONYMOUS #5	N/A	N/A	It only matters if the term "ecosystem" is relevant to the rules around the activity type. The current definition may apply to native pasture and sylvapasture activities but I don't think anyone would view an orchard inter-cropped agroforestry project as an ecosystem.
269	ANONYMOUS #6	N/A	N/A	<p>The definition of ecosystem is fairly broad, so it is possible that some ALM and other AFOLU activities could be considered to be "altering an ecosystem." For example, in cropland there is already "active planting or seeding." Do changes to those activities, such as changing the crop rotation, introducing cover crops, changing cover crop species, etc. constitute "altering" of the ecosystem? Agroforestry is obviously going to directly alter the cropland ecosystem, even though the land use itself is not changing.</p> <p>Verra may be better served by focusing on land use change, rather than ecosystem conversion. Alternatively, instead of the very broad language of "altering of an ecosystem," you could consider the more specific approach of preventing conversions between types of ecosystems (e.g., peatland to cropland, etc.).</p>
270	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	<p>The current definition implies that all existing land use is an ecosystem, and the proposed update states "Activities that convert existing ecosystems are not eligible under the VCS Program".</p> <p>This seems to imply that converting a degraded grassland into a forestry project would not qualify for carbon anymore.</p> <p>Does Verra envision there is a place for ARR projects moving forwards? If so, what would be an acceptable previous land use? It is our hope that ARR projects are still permitted when the previous land use is degraded agricultural land, as these projects have the potential to rapidly remove CO2 at scale, whilst providing benefits to the local community and environment.</p> <p>Examples of what does and does not comply for different project types would be very useful.</p>
271	Debora Souza	Future Carbon Group	Brazil	Yes, this was commented above.
272	ANONYMOUS #12	N/A	N/A	Revise "not convert existing ecosystem" Ecosystem is a broad term. It should read native ecosystem. Using existing implies that a forest that has been degraded to a pasture or grassland cannot be restored for carbon credits
273	ANONYMOUS #13	N/A	N/A	Shell views the definition as broad but clear, and clearer than those provided by the CBD and IUCN. Agricultural lands fall under the definition of ecosystem. However, a problem arises when touching upon the definition of "Ecosystem Conversion" which should be "natural ecosystem conversion". It is important to distinguish between the conversion of agricultural ecosystems and the transition from agricultural land to a secondary native forest, which should not be viewed as detrimental.

274	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	3.18.17: Not entirely clear. In case of ARR and ALM projects that include non-native monoculture species in their implementation plan for example. It is not clear what procedures the project will have to apply to comply with this update. In addition, it is not clear whether the removal of exotic species/monocultures of non-invasive species (such as eucalyptus) is also eligible when the objective of the project is ecological restoration (reverting the native ecosystem) and whether there is a need to account for the biomass of these alien species plantations at baseline. Doubts about the need to account for biomass also apply to invasive species that are eligible for removal.
275	ANONYMOUS #14	N/A	N/A	The definition of ecosystem is very broad and can be used to describe any environment. A city is also an ecosystem, whereby humans (mainly) interact with other abiotic components specific to urban livelihoods/contexts. A definition of agricultural land should be developed. This would be comparable to how native and degraded ecosystems are differentiated. This would then establish ecosystem definitions for "Native", "Degraded", and "Agricultural" — for which the definition of a "monoculture" would be a specification or additional detail.
276	STX Group	STX Group	Spain	Agricultural lands are also considered ecosystem. Some ALM activities, such as Cropland and Grassland Conversions, could be considered as ecosystem conversion as per the definition.
277	Diego Toledo	re.green	Brazil	Depending on the interpretation of the definition, an ecosystem is suggested to be defined as a complex of living organisms and the abiotic environment with which they interact in a specified location. Agriculture land management may be seen as a complex of crop species and soil microorganisms in a specific location. The definition of "complex" may be relativized.
278	Carbonext	Carbonext	Brazil	Not that we are aware of.
279	Jacob Penner	The Nature Conservancy	United States	See above comment for Question 8: the prohibition on ecosystem conversion conflicts and would therefore limit some activities currently allowed under Applicability Condition 3 in VM0042 v2.
280	ANONYMOUS #20	N/A	N/A	The definition of ecosystem is OK, the difficulty is understanding the terminology of what an 'ecosystem that existed' means, and how to interpret this. Notably for rule 3.18.18 3) – in the case of degraded grasslands. For example, degraded grasslands typically have been in existence for decades prior to the implementation of the project – or whether there is an exception to this if the area is 'degraded'. Rule 3.18.18 1 & 2) It is unclear if the rules are prohibiting the conversion of any ecosystem (i.e. degraded grasslands) for the purposes of the project. It would be helpful if the standard provided illustrative examples to qualify the points.
281	Bibiana Duarte	Systemica Net Zero	Brasil	The definition of ecosystem should not be restrictive for ALM if it is demonstrated that the project activities do not generate negative impacts or are minimized through the implementation of measures.
282	ANONYMOUS #22	N/A	N/A	<p>For section 3.18.18, what is the intention of this change? The previous language was sufficient in protecting "native ecosystems", but Verra should not change "native" to "existing" and attempt to define or include this problematic term.</p> <p>For section 3.18.18 1.), what if existing ecosystems are woody biomass in the case of either a biochar project (AFOLU?) or an improved grazing project that may require the removal of woody biomass?</p> <p>For section 3.18.18 2.), this prevents the implementation of projects aiming to restore recently degraded/deforested land (e.g. mangroves cleared by fishing communities, forests cleared due to slash-and-burn practices and others). For our ARR project, this excludes many farms that are performing the last harvest cycle of their commercial eucalyptus forest (pulp and paper industry no longer buying from that area), and are left with only two options: return to the common practice of degraded pastureland, or plant macauba in consortium with pasture. Additionally, would suggest "and/or" as part of the language "invasive species and threatening ecosystem health." "Existing ecosystems" is NOT defined in definition section below. "Native ecosystems" is a more appropriate term (still problematic but less so) and IS defined below. I am seeing issues throughout this ecosystem section on "existing ecosystems" (and having some overlap with "invasive species") for grasslands and rangelands and forest systems with natural or unnatural transitions to/from woody vegetation, use of burning as a management tool, etc. There may be less desirable species, or too much/too little density of those species, and they may or may not be "invasive."</p> <p>For section 3.18.20, what about a grouped project with individual project instances? Is this requiring that those individual contracts be mutually agreed by all participants in the grouped project even though modeling, crediting, and payments might be happening with individual private entities?</p> <p>In summary, yes the definition of ecosystem restrict activity types. This is a broad definition as is and needs to allow regional or local justification for adjustments to an ecosystem definition.</p>
283	Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>Depending on the interpretation of the definition, an ecosystem is suggested to be defined as a complex of living organisms and the abiotic environment with which they interact in a specified location. Agriculture land management may be seen as a complex of crop species and soil microorganisms in a specific location. The definition of "complex" may be relativized.</p> <p>3.18.17: Not entirely clear. In case of ARR and ALM projects that include non-native monoculture species in their implementation plan for example. It is not clear which procedures the project will have to apply to comply with this update. In addition, it is not clear whether the removal of exotic species/monocultures of non-invasive species (such as eucalyptus) is also eligible when the objective of the project is ecological restoration (reverting the native ecosystem) and whether there is a need to account for the biomass of these alien species plantations at baseline. Doubts about the need to account for biomass also apply to invasive species that are eligible for removal.</p>
284	Zimmfor	Zimmfor Management Services Ltd.	Canada	No

285 ANONYMOUS #23	N/A	N/A	it could given the likely variety of biodiversity metrics that could exist for given ALM practices across the world. The definition could do with being complemented with reference that the ecosystem should be associated within a particular biome and/or land use type to provide more precise information contextualizing the ecosystem and its baseline conditions. This needs to be harmonized with Verra's other Standards too (e.g. SD VISta).
286 Joel DeBoer	EP Carbon	United States	I have concerns about the impacts of the language used in Section 3.18.18, specifically with regards to the language regarding conversion of existing ecosystems. I note that this update is proposing changing the current language regarding native ecosystems to instead use the term existing ecosystems. If there is a clear definition of existing ecosystem in the updated VCS, I was unable to find it. However, these proposed changes seem to suggest that any conversion of an ecosystem would not be permitted, even within degraded areas. It also seems possible to interpret Sections 3.18.18.2 and 3.18.18.3 in contradictory ways. The former states "Such proof (that existing ecosystems were not cleared to implement project activities, by my interpretation) is not required where such clearing or conversion took place at least 10 years prior to the proposed project start date". Section 3.18.18.3 states: "Where the land is considered degraded, the project proponent shall demonstrate that the project activity will not convert the ecosystem type which existed at least ten years prior." As an example, the first requirement suggests that ARR activities on pastureland (that had remained pastureland for >10 years) would be eligible, as the clearing or conversion had occurred at least 10 years prior. However, 3.18.18.3 suggests that if that pastureland is considered degraded, these ARR activities would not be eligible, as they would lead to the conversion of this (existing and degraded) ecosystem that had existed for at least 10 years. As the VCS does not state the intention of these requirements, it is unclear to the reader what is the cause for this contradictory interpretation. Is Verra proposing that conservation of degraded areas is preferable to implementation of ARR activities? Why do degraded areas receive special protections but non-degraded areas (seemingly) do not? It would be helpful to the reader if the VCS could clearly state the intention of these requirements whether by providing examples or clearer definitions of key terms such as existing, ecosystem, and degraded.
287 Juliana Magalhaes	ClimeCo	Canada	I do not think it restricts, but it does not fully describe an ecosystem. I think that the interactions between the living organisms should be included also. I think it should include the source upon which that definition was based.
288 ANONYMOUS #24	N/A	N/A	The definition of "ecosystem" used in the document does not restrict activity types, in our view.
729 ANONYMOUS #25	N/A	N/A	<ul style="list-style-type: none"> <li>•How do you define an ecosystem that is undergoing successional recovery after deforestation? For instance, can land that used to be a forest but is now in the recovery process, not yet a forest, be classified as a degraded ecosystem?</li> <li>•Is the NDVI assessment enough to prove this? If not, what are the standardized rules for project developers to demonstrate that an ecosystem is no longer natural and has a level of degradation that disrupts the historical ecosystem functionality?</li> <li>•We are facing strong reactions from stakeholders on this matter and need clarification, particularly with grasslands in savannahs that have been entirely degraded by historical human-induced fires and livestock/agricultural activities. Are they still considered natural ecosystems despite historical land changes?</li> <li>•What evidence is required to prove that a savannah is historically degraded?</li> </ul>

## Updates to the AFOLU Non-Permanence Risk Tool, minimum project longevity, and crediting period requirements

<b>1. Are the withholdings for a country/jurisdiction with a history of national, sub-national, or local government intervention in land or resource use appropriate? If not, should the values be higher or lower?</b>				
Comment #	Name	Organization	Country	Comment
289	Livio Pierro	Face the Future	Netherlands	I agree with the proposed values since encroachment by governmental agencies in the project area can comport a higher risk of project failure if those interventions are persistent.
290	Mark Ritchie	Soils for the Future and CarbonSolve	USA	<p>They are inappropriate and far too severe. Further the type of risks involved are already covered under whether lands are "in dispute," especially as government changes of this nature are almost always disputed and sometimes rolled back. In the most famous case of government expropriation of which I am aware, the government of Tanzania changed the status of a portion of the Loliondo Game Control Area to a game reserve, which then promulgated the attempted removal of pastoralists from the area. Several important things to note:</p> <p>a)Converting pastoralist lands to a game reserve is likely to increase soil carbon stocks. Had a carbon project been running in Loliondo, the government expropriation would have ended the project but not resulted in carbon losses.</p> <p>b)A carbon project which led to improved grazing and restoration of wildlife habitat in Loliondo likely would have prevented expropriation, since the main reason for expropriation was to prevent further degradation of wildlife habitat in order to sell hunting permits. This points out the fact that a carbon project may itself reduce the odds of government change in land tenure or status.</p> <p>c)The expropriation occurred at a specific place for a specific reason (degraded lands that offered substantial revenues due to the proximity of a national park). Few other landscapes in Tanzania would share those characteristics, and thus carbon projects in these low risk areas would be forced to insure against a risk that doesn't really exist.</p> <p>Overall, government land tenure changes and/or expropriation are too idiosyncratic and driven by local factors to be assigned as risk factors to projects at the country level.</p>
291	Eric Wilburn	NatureBridge	USA	I'm not convinced that expropriation risk should affect a buffer pool. In the event of expropriation, there would be a complete project reversal and I believe it is the responsibility of Political Risk Insurance to cover the risk of expropriation and shouldn't be included in the buffer pool as that will have too great of an effect on a projects overall financial viability.
292	ANONYMOUS #5	N/A	N/A	I think the concept is useful but wondering how it will be determined and it can be quite transitory (e.g., Brazilian and U.S. administration changes have had dramatic consequences in short timeframes).

293 Audrey Palomar	ecosecurities	Philippines	<p>Yes. A history of state intervention in the project should be considered a risk that increases credit withholding. For projects to appropriately score this risk, the draft risk question and answer options should be improved to avoid misinterpretations.</p> <p>Question 3 of the draft NPRT is stated as, "Is the project in country/jurisdiction with a history of national, sub-national, or local government ("Government") intervention in land or resource use?".</p> <p>1. "History of national subnational, or local government intervention." How long of a history should be considered? Should this match the project longevity, or would there be a set minimum like a historical reference period?</p> <p>2. "Government interventions" There needs to be clarity on what type(s) of government intervention would create unfavorable conditions that would increase its external risk. It may be argued that government interventions such as expropriation and changing land rights were for the public good and would not threaten the project in the future. This would circumvent the purpose or intention to have this risk scored.</p> <p>3. "Previously expropriated" and "previously changed land rights." A defined period should be prescribed to avoid dissimilar approaches in assessing this risk. This is to prevent instances where one project examines this risk within one year before the project starts while others refer to 5 or even ten years before the project.</p> <p>4. Other government interventions that negatively affect the project or the project area in the context of land tenure and resource access/impacts. Other government interventions may increase the risk to the project. For example, sudden revocations of leases, licenses, or permits and moratoriums on carbon projects negatively affect projects.</p> <p>On a different point, should government interventions that positively affect the project be considered a mitigation measure that merits a -2 score? For example, what if a project is in a jurisdiction where the government is actively enforcing/granting land/access rights to projects and ensures it remains uncontested through policies, regulations, or tangible support (i.e., cancellations of other applications or permits in favor of the project)?</p>
294 Sheldon Zakreski	Independent Consultant + BluEarth Carbon Development	USA	<p>Should Verra proceed with the addition of a jurisdictional intervention score I would suggest the inclusion of a time bound especially if it stays with the current proposed scores. The scoring for Q3 a) and b) are material and it could be punitive if there isn't an ongoing history of government intervention or if the last intervention occurred say more than 30 years ago. The question on whether the scores are too high or low is contingent on the external risk threshold score.</p>
295 ANONYMOUS #10	N/A	N/A	<p>We think this could use more clarification. In Latin America, for example, nearly every national government engaged in widespread land redistribution during the 20th century, without necessarily distributing and enforcing attendant property rights (see "Property without Rights" by Michael Albertus, e.g., for a scholarly source on this). Greater clarity is necessary on what constitutes "intervention," as well as what historical time frame is relevant to this rule.</p>
296 Daniel Arturo	ecosecurities	Germany	<p>It is very realistic risk that should be included in. However, should be also put and explain some mitigation strategies too.</p>
297 Kris Hendrickx	Global Evergreening Alliance	Australia	<p>Withholdings for a country/jurisdiction with a history of national, sub-national, or local government interventions in land or resource use are not appropriate. In fact, these interventions do not always bring negative impacts to the use of resources or create disputes. An example is the intervention from government to expropriate a significant area of land to establish a national park or a nature reserve to protect some endangered species (either fauna or flora). The withholding of such intervention will challenge project proponents to implement project in this area, and thus they may decide to select another site. The consequence of this is that communities who live in this area will lose the opportunity to improve their livelihoods by participating in the project. Thus, they may continue to have negative impacts on the national park and/or nature reserve.</p> <p>Following from the above example, withholding should be limited to historical government interventions that had a negative impact on community and environment. Additionally, a timeframe of the historical intervention should be specified. Negative interventions happened further in the past should get less withholdings to those occurs recently.</p> <p>Withholdings for government interventions should be valued lower since these activities happened in the past and it should not be the evidence to assess this will happen as a trend in the future.</p> <p>Overall, government land tenure changes and/or expropriation are too idiosyncratic and driven by local factors to be assigned as risk factors to projects at the country level.</p>
298 Indradeep Das	ReNew	India	<p>The clause seems to be fair from a methodology perspective. We also agree on the importance of withholding for the entire crediting period. The impact of additional withholdings, however, on project developers might be crucial to consider as these might become deterrent for organizations to develop projects and therefore weaken or jeopardise the potential of carbon markets in those jurisdictions. So, the values should not be too high.</p>
299 Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	<p>We could not find the actual update. The change seems appropriate. It would be a great help if specific sources / tools could be provided where this risk could be assessed.</p>
300 ANONYMOUS #11	N/A	N/A	<p>Land Tenure: The revised NPRT includes risks of government intervention. Many projects we work with (especially those dealing with marginalized communities) are including formalization of land rights/titles/boundaries as a key project activity. This should be a mitigation measure and an appropriate score assigned.</p>

301 Debora Souza	Future Carbon Group	Brazil	<p>This is not appropriate, as many jurisdictions will face this risk, which may affect only properties without land titles or with lacking land tenure documentation. No project activity can be developed when the property can not demonstrate the land tenure, ownership and all applicable land documentation. Therefore, this risk is not appropriate for project activities that meet all the legal requirements in a jurisdiction.</p> <p>In addition, there is no definition about "history of intervention", i.e., how many years before the project start date? The term "history of interventions" may affect all jurisdictions in the world if it does not describe a timeframe.</p>
302 ANONYMOUS #12	N/A	N/A	<p>Reconsider making it a simple yes or no answer, especially as there is no context to especially d). What is considered the jurisdiction? In some countries there can be three or four layers. How far do you have to look back and what is the context? A government doing a once off expropriation to build a new dam or road is very different in context to a country that expropriates land for political reasons and expropriations happen seemingly randomly or to award an elite with land. This section requires revision, it is not workable in its current form. Similarly for point c) what if 5% of the project area was expropriated for a railway line and there is a slim chance of this happening again compared to a state that abuses expropriation to hand land to elites.</p>
303 Inigo Wyburd	Carbon Market Watch	Belgium	<p>Q3 d) Government has previously changed land rights in the project's jurisdiction (e.g., cancelled, or blocked land titles, expropriated land or issued overlapping land titles)</p> <p>- If a region has a history of changing land rights there is an increased risk of non-permanence due to the potential for alterations in land use and management practices and communities dependent on this land are at risk of exclusion, forced displacement and eviction, potential loss of livelihood, resource rights being relinquished and potential physical harm. REDD+ projects are often implemented in areas which have a history of corruption, and land rights violations). Therefore we believe it would be more appropriate to give a value higher than 5.</p> <p>References:</p> <ol style="list-style-type: none"> <li>1. Chhatre et al. 2012: <a href="https://doi.org/10.1016/j.cosust.2012.08.006">https://doi.org/10.1016/j.cosust.2012.08.006</a></li> <li>2. Roe et al. 2013: <a href="https://climatefocus.com/wp-content/uploads/2022/06/safeguards-paper-3.pdf">https://climatefocus.com/wp-content/uploads/2022/06/safeguards-paper-3.pdf</a></li> </ol>
304 ANONYMOUS #13	N/A	N/A	<p>Shell sees these restrictions as appropriate because the history of land intervention represents a high risk to permanence. Examples include when land has been expropriated or when the government changes the law in the jurisdiction of the project.</p>
305 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	<p>Yes it is appropriate. However, the values should be lower or the classes should be different (a value of 10 for 5% of the area is not appropriate).</p>
306 ANONYMOUS #14	N/A	N/A	<p>Is it ensured that the World Governance Indicators exclude these types of Government interventions from their scoring system to avoid double counting of a governance risk score? Given that these are not currently applied, how will future changes to the tool be considered during verification events? Since the latest versions of tools must be applied, this may substantially increase the risk buffer in subsequent verification events and may cause challenges with regards to the impacts it may have on the business plan. How would severe changes to the risk buffer be handled post-implementation during subsequent verification events?</p>
307 STX Group	STX Group	Spain	<p>If the government intervention is high, it could have a significant impact on the project (e.g. the government can use the project area for any other activities in the future, affecting the continuity of the project). Some ranges and values should be set according to potential assumptions.</p>
308 Diego Toledo	re.green	Brazil	<p>The withholdings suggested could be difficult to evaluate by project developers, and the proposed values are very high for a circumstance outside the control of the project proponent. The use of the World Bank value for country risk sounds more appropriate and fair to be evaluated by the project developer, providing robust evidence.</p>
309 ANONYMOUS #18	N/A	N/A	<p>In a number of African countries, much of the land is still in the process of being subdivided into individual plots, which necessarily results in some cases of blocked titles, expropriated land or overlapping titles. For smallholder projects that have many distributed instances across the landscape, it would be very difficult to assess the historical rate of government intervention in the entire project area (what is the timeline? what sources should be used?). Besides, the impact on carbon stock permanence is unlikely to be significant, given the distributed nature of the activities. There should therefore be a mitigation option for smallholder/distributed activities, as well as additional guidance on how to assess these elements. We need to find ways to make this work at smallholder-level if we want genuine climate and biodiversity impact at a continental level!</p>

310 Carbonext	Carbonext	Brazil	<p>It is completely appropriate to have this consideration in place, however 10 buffer points with limited possibility to mitigate this issue directly might be too penalizing for many project developers, especially in the Amazon.</p> <p>We envisage two types of solution:</p> <p>1) Penalty for item C in Land Tenure and Resource Access could be reduced from 10 to 5. Or</p> <p>2) Or there could be a mitigation item which directly addresses risk item C, such as:</p> <p>p) Mitigation: Where there is the risk of government expropriation, documented evidence exists that the practical implementation of expropriation actions from the government, such as financial buy-outs paid to landowners, has been limited over the past 10 – 20 years. -5</p> <p>and/ or</p> <p>p/ q) Mitigation: Where there is the risk of government expropriation, project proponent or developer have proven track record of winning court cases against the government, to be granted renewed full land-tenure rights and documentation over the last 10 – 20 years. -5</p>
311 ANONYMOUS #20	N/A	N/A	<p>The spirit of the rules in applying discount factors for land disputes, both at the community level and government level in the makes sense. That said, there should be a statute of limitations on this rule (i.e. 'history' should be quantified in numbers, such within the last 20 years, for example, to qualify the risk.)</p> <p>It would be important if Verra clarified that Q3 is not applicable to projects that are already being implemented on government land (because there wouldn't be a risk of expropriation as it is already on government land).</p> <p>Q3: d)</p> <ul style="list-style-type: none"> <li>•Initial: Government has previously changed land rights in the project's jurisdiction (e.g., cancelled, or blocked land titles, expropriated land or issued overlapping land titles)</li> <li>•Proposal: Government has previously changed land rights in the project's jurisdiction (e.g., cancelled, or blocked land titles, expropriated land or issued overlapping land titles) "in an area that has similar land tenure characteristics as the project area."</li> </ul> <p>Q3) c) It is unclear why 5% is deemed 'significant' by VCS, and why 10% buffer allocation is deemed reasonable for such a small threshold. Verra can resolve this by having different 'level's of land tenure issues (i.e. &lt;5% of the land area = 2% buffer, between 6 and 20%, 5% buffer is allocated... etc.). Otherwise there is no appreciation of the severity of the land tenure issues without any nuance to what is actually at risk.</p> <p>Q4 &amp;Q5) Again, it is unclear why 5% is deemed 'significant' by VCS, and why 10% buffer allocation is deemed reasonable for such a small threshold. Verra can resolve this by having different 'level's of land tenure issues (i.e. &lt;5% of the land area = 2% buffer, between 6 and 20%, 5% buffer is allocated... etc.). Otherwise there is no appreciation of the severity of the land tenure issues without any nuance to what is actually at risk. Otherwise, this rule makes sense for ACTIVE disputes.</p>
312 Bibiana Duarte	Systemica Net Zero	Brasil	Withholdings are appropriate.
313 ANONYMOUS #22	N/A	N/A	<p>For Q3 d.), "Government has previously changed land rights in the project's jurisdiction (e.g., cancelled, or blocked land titles, expropriated land or issued overlapping land titles)," how far back is Verra requesting here? In the past 10 years or historically?</p> <p>Additional questions for the NPRT:</p> <ul style="list-style-type: none"> <li>-A VCS template for the required Adaptive Management Plan would be helpful.</li> <li>-Regarding the requirement under project management Q1, response i.), training plans for "all farmers participating in the project (covering implementation of planned ALM practices, monitoring and reporting obligations and potential costs and financial necessities) is in place." An additional VCS document is needed to explain this mitigation response for project proponents developing ALM projects. Further, clarification on what is required in a "training document" and a VCS template is likely needed.</li> <li>-For Land Tenure and Resource Access/Impacts, Q1, defining "formal and/or traditional authorities" would be helpful for the project proponent and the VVB.</li> <li>-For Land Tenure and Resource Access/Impacts, Q4, "what percent of the project area has disputes over land tenure or ownership?" What are the recommended steps to determine percentage in this scenario? How will this be assessed by the VVB and Verra?</li> <li>-For Land Tenure and Resource Access/Impacts, Q5, "what percent of the project area has disputes over access/use rights?" What are the recommended steps to determine percentage in this scenario? How will this be assessed by the VVB and Verra?</li> </ul>

314	Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>The withholdings suggested could be difficult to evaluate by project developers, and the proposed values are very high for a circumstance outside the control of the project proponent. The use of the World Bank value for country risk sounds more appropriate and fair to be evaluated by the project developer, providing robust evidence. It is completely appropriate to have this consideration in place, however 10 buffer points with limited possibility to mitigate this issue directly might be too penalizing for many project developers, especially in the Amazon.</p> <p>Also, we want to bring a regional context to the question above: land grab in Brazil. Despite this issue, we recommend including non-permanence risk items related to property compliance accomplishments and not only regarding national, sub-national, or local government. We understand that all project proponents are able to keep transparency giving all evidence of ownership documents which include property domain chain, land taxes (ITR, CCIR), INCRA certification, and Forest Code registry (CAR) to Verra.</p> <p>However, if this approach continues, the values should be lower or the classes should be different (a value of 10 for 5% of the area is not appropriate).</p>
315	Zimmfor	Zimmfor Management Services Ltd.	Canada	<p>It could be lower, or the external risk threshold needs to be increased. This non-permanence risk related to government intervention is outside the influence of the Project Proponent, and also cannot be mitigated in anyway by the Proponent, therefore, projects that are attempting to implement within countries that are affected by this condition are already at a large disadvantage.</p>
316	ANONYMOUS #23	N/A	N/A	<p>Yes, the withholdings for a country/jurisdiction with a history of national, sub-national, or local government intervention in land or resource use are appropriate. However, Verra should refrain from using language such as "previously expropriated" or "no instances of..." in Table 3: Land Tenure and Resource Access/Impacts. Ambiguous language such as this will lead to further misinterpretation of the validity of VCS AFOLU projects, and ultimately will enhance scrutiny within the voluntary carbon market. Instead, Verra should consider adopting timeframes for responses to Q3 (e.g., 15 years prior to the project start date, records of expropriation for land use).</p>
317	Juliana Magalhaes	ClimeCo	Canada	<p>Yes, they are appropriate, but I think the values for all external risks related to land tenure and resource access/impacts should match. The value of 2 is attributed to b) ownership and resource access, so the same value should be used for the other external risks. My understanding is that applying those withholdings would be a cautious approach to the external risks since they could increase the likelihood of avoidable reversals. I wonder if a mitigation measure could be implemented in the non-permanence risk tool, such as the period since the intervention happened and evidence that demonstrates project has implemented activities to protect from expropriations.</p>
318	ANONYMOUS #24	N/A	USA	<p>Yes.</p>
726	Sheldon Zakreski	BluEarth Carbon Development		<p><b>Non-Permanence Risk Tool</b></p> <p>The areas where I have comments on the proposed updates to the NPRT are:</p> <ul style="list-style-type: none"> <li>• Table 2- Project Longevity Question 3</li> <li>• Table 3-Land Tenure and Resource Access/Impacts Question 3</li> <li>• Expanding project proponent buffer risk mitigation options to non-AFOLU Verified Carbon Units</li> <li>• The role of a financial reversal risk insurance product as a permanence safeguard</li> </ul> <p>Table 2 Project Longevity- The formulas for Q3 a) and b) appear to generate the illogical result where a project with a legal agreement or requirement to continue the management practice would receive a higher score than projects without such safeguards in place. For example, a project with a longevity of 60 years would receive the following scores:</p> <p>a) <math>25 - (60/5) = 13</math>          b) <math>30 - (60/4) = 15</math></p> <p>Revising the formulas as follows would send the correct signal that non=permanence risk is lower with legal or other requirements to continue the management practice are in place:</p> <p>a) <math>= 25 - (\text{project longevity}/4)</math>, if project longevity is 60 years score is <math>25 - (60/4) = 10</math>          b) <math>= 20 - (\text{project longevity}/5)</math>, if project longevity is 60 years score is <math>20 - (60/5) = 8</math></p> <p>Although the scores are lower with the proposed revised formulas, these changes would not necessarily lead to lower overall scores and an increased risk that the VCS buffer pool is underinsured. Taking the proposed revised formulas along with the proposed: i) removal of mitigation measures for having an adaptive management plan and net positive impact on local communities; and ii) inclusion of government expropriation risk would have a moderating effect on the overall non-permanence risk score.</p> <p>Table 3 Land Tenure and Resource Access/Impacts- Should Verra proceed with the addition of a jurisdictional intervention score I would suggest the inclusion of a time bound especially if it stays with the current proposed scores. The scoring for Q3 a) and b) are material and it could be punitive if there isn't an ongoing history of government intervention or if the last intervention occurred say more than 30 years ago. Should these changes be adopted as proposed Verra should investigate the efficacy of increasing the external risk threshold score.</p> <p>General comment on VCU contributions to the buffer pool- Verra should consider allowing proponents to use Verified Carbon Units (VCUs) from non-AFOLU projects as source of meeting their buffer contribution requirements. Verra can place requirements on doing so but expanding the buffer pool to include non-AFOLU VCUs will enhance the robustness of VCUs in the buffer pool. This has been an option the American Carbon Registry (ACR) has provided AFOLU project proponents for the past several years and has provided project proponents multiple ways to meet their buffer contribution requirements without having negative implications for the robustness of the buffer insurance pool.</p>

## 2. Should Verra increase the maximum external risk threshold in the NPRT (currently set at 20) because of these proposed changes?

Comment #	Name	Organization	Country	Comment
319	Livio Pierro	Face the Future	Netherlands	No, I would keep the threshold at 20 to foster the credibility of AFOLU Carbon Projects.

320	Mark Ritchie	Soils for the Future and CarbonSolve	USA	No because these risk score increases shouldn't exist
321	Eric Wilburn	NatureBridge	USA	No, but it should be required that projects disclose the NPRT to all stakeholders, especially end stakeholders and buyers (which should already occur given PDDs are public documents).
322	ANONYMOUS #5	N/A	N/A	Yes, I think if the data demonstrates it should be. Using this space to also comment on 2.1.1 (2) for long term (e.g., tree) plantings, there should be evidence (if available) that they are adapted to expected climate conditions at the end of the crediting period. This is something I already consider in due diligence of ARR projects but I have to research it myself.
323	Josiah McClellan	Land O'Lakes	United States	<p>Please note that the equations for a) and b) in Table 2 appear to be unbalanced. For example, a 40-year project longevity results in a lower PL score for a project without contracts <math>[25-(40/5)=17]</math> than a project with contracts <math>[30-(40/4)=20]</math>.</p> <p>Also note for Table 2, Question 1, common law in the US prohibits covenants of 100 years on property deeds. The proposed language presents a tension where a US based project would be non-compliant with US law if longevity was contracted to 100 years. Verra should seek a better balance between longevity requirements and legal compliance related to contract instruments.</p>
324	ANONYMOUS #8	N/A	N/A	Yes
325	Audrey Palomar	ecosecurities	Philippines	Yes, the maximum external risk threshold should be increased.
326	Sheldon Zakreski	Independent Consultant + BluEarth Carbon Development	USA	I would recommend Verra examine changing the threshold score, especially if it adopts the proposed jurisdictional intervention scores.
327	Daniel Arturo	ecosecurities	Germany	Yes, higher could be more conservative and realistic.
328	Kris Hendrickx	Global Evergreening Alliance	Australia	The increase of maximum external risk threshold in the NPRT is necessary. It will reflect the important of the proposed changes contributing to the project. Thus, the overall risk rating (which is currently determined at 60) should be also increase accordingly.
329	Indradeep Das	ReNew	India	No comments.
330	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Not necessarily.
331	ANONYMOUS #11	N/A	N/A	Considering that these new requirements will affect the project risk scores considerably, we are of the opinion that perhaps Verra should standardize the buffer percentages.
332	Debora Souza	Future Carbon Group	Brazil	Yes, the purpose changes will prevent many project activities to participate in carbon credits markets, specially for those projects where carbon credits are the only alternative to generate positive benefits in a region subject to high external risks.
333	ANONYMOUS #12	N/A	N/A	No 20% per section is already high, rather fix how this rating works.
334	Inigo Wyburd	Carbon Market Watch	Belgium	- The proposed change is not of a sufficient (numerical) magnitude to warrant an adaptation of the risk threshold. We recommend maintaining the threshold as it is to ensure that projects facing a high level of risk are not registered under the VCS.
335	ANONYMOUS #13	N/A	N/A	Shell does not support increasing the maximum risk threshold. The cases of governments seizing land (especially those involved in NBS cases) are very rare. Increasing the minimum risk would only result in additional high-risk projects qualifying.
336	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	Yes, since longevity can already result in 20 points. On longevity, according to the proposal for the new calculations, is it appropriate that higher values are assigned when there are NO legal requirements to continue management practices?
337	STX Group	STX Group	Spain	20% is appropriate as the maximum external risk.
338	ANONYMOUS #17	N/A	N/A	no
339	Márcia Silva	Ibá	Brazil	No. We suggest keeping the score weights even with the suggested changes.
340	Diego Toledo	re.green	Brazil	Yes, because the proposed changes exclude a mitigation option in the Stakeholder engagement (-5) and include other variables that may increase the external risk values.
341	Carbonext	Carbonext	Brazil	No
342	ANONYMOUS #20	N/A	N/A	No – this is because the proposed changes are clearly directed towards countries that have weaker institutions for land tenure, but they should not be unreasonably punished for this.
343	Bibiana Duarte	Systemica Net Zero	Brasil	Yes, it would be necessary to guarantee the long-term benefits of the projects
344	ANONYMOUS #22	N/A	N/A	No response to this prompt.
345	Carla Zorzaneli	NBS Brazil Alliance	Brasil	Yes, because the proposed changes exclude a mitigation option in the Stakeholder engagement (-5) and include other variables that may increase the external risk values, since longevity can already result in 20 points. On longevity, according to the proposal for the new calculations, is it appropriate that higher values are assigned when there are NO legal requirements to continue management practices?
346	Zimmfor	Zimmfor Management Services Ltd.	Canada	Should be increased, as Q4 and Q5 could potentially have overlap (i.e., disputes in ownership in a lot of cases would correlate to disputes in access), and if answered the same, could result in 20 points in just those 2 questions. Additionally, the answer to Q3 (government intervention) cannot be mitigated in anyway by the Project Proponent and can result in a value of 10, making up half of the external risk threshold score. In this hypothetical case, the project could fail the non-permanence assessment due to its country location and potential ownership disputes on as little as 6% of project lands alone.

347 ANONYMOUS #23	N/A	N/A	Yes, a weighted average to reflect the additional changes should be considered.
348 Juliana Magalhaes	ClimeCo	Canada	For now, it makes sense to keep a maximum external risk threshold of 20%. It is more restrictive and thus will filter projects. For instance, ownership disputes, Government intervention and stakeholder engagement (e.g. indigenous community engagement) are external risks that could restrict registering the project. My understanding is that applying a maximum external risk threshold of 20% would be a cautious approach to decrease the likelihood of avoidable reversals and gaining public trust in the projects.
349 ANONYMOUS #24	N/A	USA	No.

### 3. Should Verra add an extra withholding for projects that have experienced a past non-catastrophic (i.e., avoidable) reversal? If so, how much should the withholding be?

Comment #	Name	Organization	Country	Comment
350	Livio Pierro	Face the Future	Netherlands	If project did not start yet, how do you plan to determine whether such reversal happened? Should not this question be referred to the project area? In any case it may be complicated to demonstrate these reversals and therefore determine an appropriate withholding value.
351	Mark Ritchie	Soils for the Future and CarbonSolve	USA	There should not be a blanket policy. Project proponents can learn from their mistakes, and projects that experienced a prior loss may in fact be less likely to do so again. Context matters as well – it is unclear what reversals are avoidable (do political disputes that disrupt community participation count as avoidable? Does overestimation of removals by models, which are then recalibrated to be more conservative, count?)
352	Eric Wilburn	NatureBridge	USA	No comment
353	ANONYMOUS #5	N/A	N/A	I think it would be appropriate but PPs should be allowed to challenge it by demonstrating how the past situation has been permanently resolved so it can't happen again.
354	ANONYMOUS #8	N/A	N/A	In my opinion, not all non-catastrophic reversals are the same. It might be worth being more specific on which ones will require an additional withholding. Maybe the withholding could be a percentage of the reversal or dependent on the reversal type?
355	Audrey Palomar	ecosecurities	Philippines	An extra withholding for past non-catastrophic reversals should apply. The withholding amount may be a percentage proportionate to the amount of reversals against the credits issued.
356	Sheldon Zakreski	Independent Consultant + BluEarth Carbon Development	USA	It is not clear to me that non-catastrophic and avoidable reversals are one in the same. For example, forest projects can experience minor fires where carbon emissions are a fraction of the change in forest carbon stocks between verifications. This could be a scenario of a non-catastrophic, but unavoidable scenario where it would seem punitive to impose an extra withholding
357	Daniel Arturo	ecosecurities	Germany	Yes an extra withholdings for projects that have experienced a past non-catastrophic reversal should apply. An extra withholdings could also apply if project proponent have experienced a past non-catastrophic reversal. The withholding could be between 2 to 5, depending on the reason of the reversal. If project proponent has past experience with another project that has reversal, project proponent should be able to provide evidence that adapted mitigation action will be put in place to prevent the same reversal to happen again (if the project type is the same).
358	Indradeep Das	ReNew	India	Additional withholding on previous projects which have experienced avoidable reversible would ensure higher methodology reputation. From a project developer perspective - if properly deployed in advocacy strategies - can represent a good 'redemption' opportunity. If poorly perceived by project's developers, it could however represent deterrent for further projects as trust in VCS could drop by sending a higher risk perception.
359	Debora Souza	Future Carbon Group	Brazil	No.
360	ANONYMOUS #12	N/A	N/A	It depends what the reasons for the reversal was for, was it for an extremely rare geological event or a fairly common weather event? If a project has had continuous reversals due to events such as fires or cyclones then it could be considered, but only in extreme cases as the project will already have to revise their NPR score and commit more to the buffer pool.
361	Inigo Wyburd	Carbon Market Watch	Belgium	- Yes, there should be a higher withholding, but we don't have a specific rate to suggest at this time.
362	ANONYMOUS #13	N/A	N/A	Shell is supportive. If projects have experienced an avoidable reversal, they should have additional risking. However, if the project implements additional measures for mitigation of said risk, then a risk mitigation measure should also be made available.
363	Caio Gallego	Biofillica Ambipar Environmental Investments	Brazil	Only if there is a repeat of the non-catastrophic reversal. If the reversal occurred only once, an extra retention should not be added.
364	STX Group	STX Group	Spain	It is recommended to analyze case by case these projects that have experienced a non-catastrophic reversal to see their appropriateness. Additionally, it could be added as another risk category to the NPRT. Therefore, the extra credits will be allocated to the buffer pool for such a project. The risk rate can be set up depending on what is possible in the future.
365	Lynn Riley	American Forest Foundation	United States	No. Projects that experience a past non-catastrophic reversal are already held fully accountable through the loss event and buffer pool procedures, and therefore, an additional withholding is not necessary. The project proponent often carries external dependencies on landowners, foresters, operators, and others to develop a project. Even if a non-catastrophic risk could have been avoidable, it may have been carried out by an entity other than the project proponent, and yet the project proponent would be penalized by this extra withholding, even after making the buffer pool whole. In this way, the proposed update to add an extra withholding carries a risk of not aligning the penalty to the perpetrator, and over-burdening project proponents who are already required to make a non-catastrophic reversal whole.
366	Márcia Silva	Ibá	Brazil	It is not clear how it will be confirmed that the event occurred in a way that could have been avoided, i.e., what criteria will be used to study these specific cases. If there is no clear criterion, for example, non-catastrophic reversals in more than 20% of the total project removals, there should be no additional retention. Regarding the extra withholding, it should not be high enough to discourage proponents from carrying out other projects; instead, the penalty should incentivize the adoption of the best possible practices within a project.

367	Diego Toledo	re.green	Brazil	We understand that Verra shouldn't add an extra withholding, as the projects are already penalized by natural risk probability (such as fires). Also, such accidents occur mainly due to illegal fires coming from outside the project area, an aspect that cannot be fully controlled by the project proponent.
368	Carbonext	Carbonext	Brazil	No
369	ANONYMOUS #20	N/A	N/A	We dont have strong views on this, but another means of insurance instead of increasing buffer pool, is following a reversal event to reduce the project proponent's ability to release buffer credits in the future as a result (assuming the reversals have already been recouped by the next verification)
370	Bibiana Duarte	Systemica Net Zero	Brasil	Yes, holds should be considered for both non-avoidable and avoidable reversals
371	ANONYMOUS #22	N/A	N/A	Is "past" considered to be during a previous crediting period? Verra to revisit requirements for AFOLU buffer pools?
372	Carla Zorzanelli	NBS Brazil Alliance	Brasil	Only if there is a repetition of the non-catastrophic reversal. If the reversal occurred only once, an extra retention should not be added. But Verra could consider not adding an extra withholding, as the projects are already penalized by natural risk probability (such as fires). Also, such accidents occur mainly due to illegal fires coming from outside the project area, an aspect that cannot be fully controlled by the project proponent.
373	Zimmfor	Zimmfor Management Services Ltd.	Canada	No – the non-permanence buffer and methods to replace the buffer credits used in case of reversals are in place for this exact purpose.
374	ANONYMOUS #23	N/A	N/A	VSI answer: Yes, additional withholdings for projects that have experience past non-catastrophic reversals should be considered if: 1.The reversal event occurs through land management practices that exceed the allowable activities (or break clauses) within the legal protection mechanism. 2.The project area does not have a formal protection mechanism emplaced.
375	Juliana Magalhaes	ClimeCo	Canada	No, I think that proof of credits replenishment and mitigation measure should be enough for gaining trust in the project.
376	ANONYMOUS #24	N/A	USA	Not necessarily; this could penalize projects that experienced a one-off reversal that has already been buffered/compensated.

#### 4. As an alternative option to increasing the minimum crediting period to 40 years, Verra is also considering giving projects two options. Which option do you prefer?

Comment #	Name	Organization	Country	Comment
				Final tally including email responses: a. Voluntarily commit to an initial crediting period of 40-years: 15 responses b. Adopt a minimum crediting period of 20-years and sign an agreement with Verra to monitor and compensate reversals for at least 40 years: 20 responses

#### Please explain why you prefer one option over the other in question 4.

Comment #	Name	Organization	Country	Comment
377	Livio Pierro	Face the Future	Netherlands	I would make compulsory that projects commit to an initial crediting period of 40-years. Recently the credibility of voluntary carbon markets and carbon forestry has been discussed hence increasing the crediting period would foster the long-term involvement of project proponent, thus fighting supposed project permanence issues.
378	Mark Ritchie	Soils for the Future and CarbonSolve	USA	Option b in a heartbeat, assuming I'm reading this right that, at year 20, you can still claim credits for another 20 years if you choose (that's what's meant by a minimum crediting period). Option b gives way more flexibility for AFOLU projects on private lands or lands governed by leases.
379	Eric Wilburn	NatureBridge	USA	There are few reasons for a project to not commit to a longer initial crediting period as the PDD is the main cost, especially if monitoring for reversals will be required for 40 years. (a) keeps things simple.
380	ANONYMOUS #4	N/A	N/A	40 years is very difficult to assure since it is very long term
381	ANONYMOUS #5	N/A	N/A	The market will drive demand for option a--as is already being seen in the VCM, investors are signaling desire for greater permanence. My concern about b is feasibility for funding monitoring and compensation decades after a project has effectively ended. That said, if option a is selected there needs to be strong mechanisms to enforce it given that credits may have fetched a premium for having additional permanence.
382	Josiah McClellan	Land O'Lakes	United States	This option has worked well with other voluntary carbon market programs and creates additional options for climate mitigation activities. It offers the opportunity for 40-year crediting periods while maintaining viability of shorter crediting periods that can still have a positive impact.
383	ANONYMOUS #6	N/A	N/A	This keeps the VCS more closely aligned with ALM projects across registries.
384	ANONYMOUS #7	N/A	N/A	The 40 year crediting period decreases risk of reversal - but may not be appropriate in all cases. The choice to select the option most appropriate to site circumstances makes most sense.
385	ANONYMOUS #8	N/A	N/A	I would rather have the option to credit that only pay to monitor without crediting.
386	Audrey Palomar	ecosecurities	Philippines	Option B is preferred. While Option A demonstrates longevity on paper, Option B can achieve the same effect without restricting all projects to a 40-year crediting period. A prescriptive 40-year crediting period may hamper project development in countries with tenure agreements covering less than 40 years. It may also become a precursor to developing a new tenure instrument to meet the VCS requirement. This may cause a development lag if additional policies or government procedures are necessary to achieve it.
387	Sheldon Zakreski	Independent Consultant + BluEarth Carbon Development	USA	The advisable option is setting a minimum crediting period of 20 years and minimum project permanence of 40 years respectively. There are many jurisdictions that have maximum land contract terms with forest communities that are less than 40 years. Such projects would be shut out from VCS certification if the contracts are not able to be extended. By splitting up minimum crediting period and minimum permanence period gives project proponents the ability to pursue projects and devise strategies for ensuring 40-year permanence with VCS. This is also identical to how ACR's forest carbon project protocol, which has registered dozens of projects, addresses crediting period and permanence.

388	Daniel Arturo	ecosecurities	Germany	Option B, because depend less on assumptions, while relying on realistic changes that could happen during process development. However, the option should include an option/statement to extend crediting period of the project, otherwise financially would be less appealing for the projects developers. Additionally, project developers should not pay for extra monitoring.
389	Kris Hendrickx	Global Evergreening Alliance	Australia	<p>Before addressing one of the two options, we'd like to argue that while it is a good idea to align crediting period and longevity, it will be detrimental for stakeholders who participate in ARR and ALM projects that focus on agroforestry:</p> <ul style="list-style-type: none"> <li>•Increasing the minimum period to 40 years will make farmers or farmers groups (groups) hesitant to the join the program as it would require a long(er) multi-generational commitment. Less farmers might join the program, which might mean that they will have to plant more trees (in the case of ARR-project) to achieve targets agreed by the project developer and investors.</li> <li>•Many agroforestry species have their periods of accelerated growth (and CO2 sequestration) between 15- 25 years of age. Afterwards, growth plateaus and the increases in carbon yield will be minimal, to the point that it would become economically not viable anymore to continue with the monitoring and verification after 30 years, as the costs might be higher than the benefits (extra VCUs). This also means that the social benefits for farmers will be negatively impacted. This contradicts with Verra targets in developing projects which target contribution to the United Nations' Sustainable Development Goals (SDGs).</li> </ul> <p>If an increase to longevity and crediting period to 40 years is decided upon, we would like to request a transition period of at least 18 months from the old to the new crediting and longevity period. We are currently developing several community-based land restoration projects in East and Southeast Africa, where community engagement has already started with the assumption of a 30-year crediting period. Budgeting and fundraising for the projects have been completed based on a 30-year life-of-project. If we had to adjust this to 40 years, it would have detrimental effects on the further roll out of the projects and the development of the VCS documentation.</p> <p>While preferring no change at all in crediting and longevity, if an alternative is sought for the proposed change, we do not prefer any of the two options above the other.</p> <p>Although it may be harder to persuade farmers to sign a longer carbon development agreement (contract), but once signed, it is a legal agreement that commits them to manage the trees for at least 40 years, bringing stability for the project proponent and all stakeholders that share in the benefits. An initial crediting period of 20 years lowers the bar for farmers and farmers groups when it comes to signing up to the program and they will be able to partake in the benefit sharing of the VCUs. Based on the expected ecological and economic benefits of integrating trees in the farming system, the option for farmers to go for second crediting period of 20 years is highly probable, ensuring the minimum longevity at the same time.</p>
390	Indradeep Das	ReNew	India	That's the safest way (additional removals/reductions minus loss event size) to (1) ensure as much additionality as possible, thus (2) guarantee high quality credits; (3) protect the methodology and the project developers (us) reputation. We suggest a certain percentage of withholding even at the end of crediting period.
391	Giuliano Ramos Alves	Associação Brasileira do Agronegócio (ABAG)	Brazil	The issue of permanence and monitoring of the "reversals" over a period of 40 years is something that should be carefully studied, since the responsibility for long-term monitoring will fall on the project proponent and Verra. This, because in the agribusiness context, it is extremely complex and difficult to guarantee this permanence, especially in Brazil, since to make it feasible, the projects in the agro will have to be on very large scales, taking advantage of buffers to mitigate issues of reversibility and permanence.
392	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	A 40-year crediting period seems to make sense. If the liability towards Verra is the same, maybe just require extension of the crediting period?
393	ANONYMOUS #11	N/A	N/A	<p>Our response is with keeping in mind our investors. It's hard to say how the investors will respond to the 4.b. option.</p> <p>Project developers could work with both options, but we are more concerned about</p> <ol style="list-style-type: none"> <li>1. will the frequency of Verifications increase?</li> <li>2. If so, this will increase project development cost.</li> <li>3. An agreement with Verra sounds like more frequent monitoring and verifications</li> </ol>
394	Debora Souza	Future Carbon Group	Brazil	<p>It is already extremely hard to enter agreements with land owners and stewards willing to commit to 20 years. So while we appreciate the simplicity of making "project longevity" and "minimum crediting period" equal, we recommend both to be set at 30 years as a more pragmatic approach.</p> <p>As such, the best option would be to maintain a 30-year crediting period, because it is usually one lifetime generation. However, in the case of a minimum crediting period of 40 years, at this point option 4b would usually be preferred.</p>
395	ANONYMOUS #12	N/A	N/A	Signing 40 year agreements for monitoring with lands rights holders will be a difficult ask, shorter renewable periods are a better option. Committing to monitoring beyond the crediting period will be very challenging for community based projects.
396	ANONYMOUS #13	N/A	N/A	Without more information about the implementation of the two options offered above, Shell finds it challenging to state a preference. This is further complicated by lack of clarity between crediting period and project longevity. Further details are required to make a decision such as how Verra would enforce voluntary monitoring commitments made by projects, and/or how enforcement of this requirement would vary between project types.
397	Caio Gallego	Bioflica Ambipar Environmental Investments	Brazil	For the second option, there is a greater chance that proponents will actually be able to comply in practice. The first option may make the implementation of some projects unfeasible (for example: succession uncertainty for landowners and community leaders). Thus, signing 40-year agreements with landowners can make adherence to the project more difficult. Including an amendment to the contract (and the project) may be more feasible.

398 ANONYMOUS #14	N/A	N/A	<p>Option A is preferred. Option B seems riskier as post-crediting period monitoring undertaken by the project developer will occur once the investors commitment period has terminated. If any corrective actions are needed, the developer will bear the financial burden alone.</p> <p>In addition, increasing the project longevity will enhance challenges already faced by project developers as it is difficult to get external commitments (from investors) for such durations. From an investor perspective, investors aren't willing to commit beyond 30 years as financial modelling is too hazardous. If private investors can't commit to such long-term agreements, why would local communities do it? This may be creating an obstacle to projects as it will be difficult to have matching longevities on both investor and community sides. The risk will therefore need to be taken on by someone else for the period not financed (i.e., Project Implementor, communities, or Project Proponent).</p>
399 STX Group	STX Group	Spain	<p>a)The 40-year crediting period will be very long for some types (e.g. AFOLU projects, it is difficult to get a commitment from farmer communities for 40 years of project activities especially for ALM project activities as it will depend on their farming plan).</p> <p>b)Verra should clarify more on the compensation reversals scheme, should it be covered by the risk buffer pool?</p>
400 Lynn Riley	American Forest Foundation	United States	<p>We prefer option B, because this allows flexibility for project proponents for whom an initial crediting period of 40 years would not be viable, thus disincentivizing the climate action. We believe monitoring and compensating for reversals for at least 40 years is a reasonable and achievable expectation, particularly given Verra's work on the Long-Term Remote Monitoring System and upcoming technology.</p>
401 ANONYMOUS #16	N/A	N/A	<p>We believe that minimum crediting period should be in general the same duration as minimum project longevity, to achieve the consistency between both.</p> <p>Agoro Carbon appreciates Verra's efforts to align with the Core Carbon Principles related to the permanence requirements of '40-year minimum commitment to monitor, report, and compensate for avoidable reversals'. Nevertheless, if the proposed wording is to be included in the VCS Standard, we seek clarification on the meaning of 'monitor and compensate reversals'. We would like to suggest additional and clear guidance on this proposed approach. Several methods for monitoring and reporting should be used in this regard (new and emerging technologies, remote sensing, interviews etc), all of these should be clearly explained. Furthermore, the mechanism for compensation should be clearly explained, if this new mechanism is different from the current VCS approach.</p>
402 ANONYMOUS #17	N/A	N/A	<p>once a project partially disengages such a commitment may be difficult to implement</p>
403 Márcia Silva	Ibá	Brazil	<p>Regardless of the chosen option, the project's assurance depends on the project proponent, and in case of a reversal, it can be compensated. If the proponent decides to voluntarily commit to maintaining the project for 40 years, there tends to be a greater limitation on the participation of small / medium-sized lands since it is more challenging to obtain contracts with such a long duration (40 years) compared to contracts of 20 years, which is the minimum credit period (which already faces some resistance).</p> <p>It is important to make it clear that compliance with any of the criteria does not depend solely on the existence of a contract with the same longevity, as such long-term contracts may end up discouraging the engagement of small and medium-sized producers. The instrument should focus on positive incentives precisely to encourage the conversion of non-forested areas into forested areas.</p>
404 Diego Toledo	re.green	Brazil	<p>Option (a) is more suitable, as option (b) may have a very short time frame (20 years) for ARR projects, for example.</p>
405 ANONYMOUS #18	N/A	N/A	<p>Option b) is likely to make more sense for projects that have a relatively short issuance timeline, such as AFOLU projects with harvesting activities, that reach their long-term average carbon stock in the first 20 years of activities. For these projects, a 40-year crediting period would mean 20 years of full verification audits (and associated costs) without issuing any VCU, which could jeopardize the financial viability of the project. Instead, in scenario b) the project would conduct audits for 20 years, followed by a minimum of 20 years of lighter but regular monitoring and reporting to Verra (ideally using remote sensing) which would keep project maintenance costs down.</p>
406 ANONYMOUS #19	N/A	N/A	<p>Crediting periods will have a significant impact on group reforestation projects with harvest.</p>
407 Carbonext	Carbonext	Brazil	<p>Option b) would be preferable as it provides greater flexibility, meaning it can be better adapted to different projects, realities, and project's specifications.</p> <p>However, it is essential to make it clear that this increase in the project's longevity by 10 years (from 30 to 40 years) may bring negative impacts. For example, it could be challenging to convince and gain commitment from new proponents for carbon projects, given the extended commitment period. This aspect is even more problematic when considering APD projects, that usually have a shorter crediting period.</p> <p>This issue could be alleviated if the carbon market was already well-established. Still, in a time of construction and uncertainties like the current one, it may not be desirable to increase project longevity. Especially considering that 30 years is already a considerable period during which various structuring benefits can be built in project areas.</p>

408 ANONYMOUS #20	N/A	N/A	<p>Option 4b – minimum 20-year crediting period. This is more realistic in terms of project developer’s engagements with community and also in terms of mobilising investment for projects from investors and corporations. A minimum crediting period of 40 years is unrealistic, especially for small holder farmers in signing their rights for that period of time.</p> <p>It is unclear what Verra means by ‘sign an agreement’ and the cost implications of monitoring without any returns for credits. Further, having hundreds of partners sign agreements that last 40 years will be pragmatically difficult to enforce by the standard and simply not credible. Given the pace of change in the industry and technology more widely, Verra should consider taking on more responsibility in monitoring long term reversals through remote sensing over the next 5-10 years, and remove the ability of project partners to recoup their buffer credits as a result- to be able to cover future reversals.</p>
409 Bibiana Duarte	Systemica Net Zero	Brasil	<p>It is important that from the beginning an accreditation period of 40 years is established to monitor the reversals over that period and that the quantification already has a total established period</p>
410 ANONYMOUS #22	N/A	N/A	<p>Requirement of 40 year for crediting period is far too long as it is difficult to have ALM project stakeholders commit to project activities for that duration of time due to nature of ranching, farming, succession plans, etc</p> <p>Would this entail 20 year agreements with stakeholders but a 40 year agreement with Verra? What happens if a project ends after 20 year crediting period and 30 yr longevity period?</p> <p>This requirement would also significantly increases project risks and costs for the project proponent. If a landowner/farmer does not need to sign a contract, how can we ensure permanence?</p>
411 Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>For the second option, there is a greater chance that proponents will actually be able to comply in practice. The first option may make the implementation of some projects unfeasible (for example: succession uncertainty for landowners and community leaders). Thus, signing 40-year agreements with landowners can make adherence to the project more difficult. Including an amendment to the contract (and the project) may be more feasible.</p> <p>It is essential to make it clear that this increase in the project's longevity by 10 years (from 30 to 40 years) may bring negative impacts. For example, it could be challenging to convince and gain commitment from new proponents for carbon projects, given the extended commitment period. This aspect is even more problematic when considering APD projects, that usually have a shorter crediting period. This issue could be alleviated if the carbon market was already well-established. Still, in a time of construction and uncertainties like the current one, it may not be desirable to increase project longevity. Especially considering that 30 years is already a considerable period during which various structuring benefits can be built in project areas.</p> <p>We believe that a 40-year monitoring period contract/term should be agreed upon between owners, project proponents, and Verra in order to assure the carbon project's longevity and not only for proponent projects and Verra. We believe that this commitment should involve all VCU's benefited stakeholders.</p>
412 Zimmfor	Zimmfor Management Services Ltd.	Canada	<p>A note regarding 40-year crediting periods: projects that are already implemented should be grandfathered under the 30-year crediting period requirements. Legal agreements as well as business planning has been conducted in many cases for these projects and an increase in project crediting years could potentially create significant legal repercussions for these Proponents (ex., breach of contract with investors). Prefer having both options. Depending on the project type and ownership structure/ capacity of project proponents, either of these options could be beneficial.</p>
413 ANONYMOUS #23	N/A	N/A	<p>Option b) as previous piloting experiences indicate that shorter crediting timelines are viewed as a more secure (less risk) option by project proponents and landowners.</p>
414 Juliana Magalhaes	ClimeCo	Canada	<p>I prefer option a). My understanding is that option b) could increase the operational costs, making some projects (e.g. small-scale reforestation) unfeasible.</p>
415 ANONYMOUS #24	N/A	USA	<p>b. In our view, within the constrains imposed by scientific accuracy and methodological rigor, as much flexibility should be allowed as possible to allow maximum financial flows into climate finance.</p>
725 Sheldon Zakreski	BluEarth Carbon Development		<p>Project Crediting Period</p> <p>The Public Consultation document provides two choices in establishing project longevity and crediting period with the options being: a) voluntarily commit to an initial crediting period of 40 years; or b) adopt a minimum crediting period of 20 years and sign an agreement with Verra to monitor and compensate for reversals for 40 years. The advisable option is setting a minimum crediting period of 20 years and minimum project permanence of 40 years respectively. There are many jurisdictions that have maximum land contract terms with forest communities that are less than 40 years. Such projects would be shut out from VCS certification if the contracts are not able to be extended. By splitting up minimum crediting period and minimum permanence period gives project proponents the ability to pursue projects and devise strategies for ensuring 40-year permanence with VCS. This is also identical to how ACR's forest carbon project protocol, which has registered dozens of projects, addresses crediting period and permanence.</p>

5a. If Verra introduced the monitoring agreement option (Option 'b' to question 4): How should reversals be quantified in the post-crediting period? For example, should they be based on net accounting (i.e.,				
Comment #	Name	Organization	Country	Comment
416	Livio Piero	Face the Future	Netherlands	I do not really know what to answer. It just sounds utterly complicated and adds another layer of complexity to the already tedious certification process. I believe is not needed and enforcing 40 years crediting period would be safer and logical.
417	Mark Ritchie	Soils for the Future and CarbonSolve	USA	Absolutely they should be calculated on the basis of net accounting. In the case that non-event changes in in emissions and pools are not known during the post-crediting period, only the event-related losses, then any non-event removals can be conservatively excluded. However, projects should be rewarded for continued high quality monitoring.
418	Eric Wilburn	NatureBridge	USA	Additional removals/reductions minus loss event size
419	ANONYMOUS #4	N/A	N/A	VCUs from last two years of crediting period should remain in buffer pool to guarantee risk assurance
420	ANONYMOUS #7	N/A	N/A	This is logical.
421	ANONYMOUS #8	N/A	N/A	It would be extremely difficult to assess. Even if you have a legally binding agreement, these might be challenging to enforce in developing countries. In my opinion, the market should provide the incentives to continue monitoring or the implementation of a compliance market, rather than an agreement with Verra.
422	Audrey Palomar	ecosecurities	Philippines	Yes, net accounting would be the most straightforward approach.
423	ANONYMOUS #10	N/A	N/A	Yes, a net accounting approach would be appropriate as that would account not only for losses but also for the durable impacts of project activities even after the activities themselves cease to generate credits.
424	Daniel Arturo	ecosecurities	Germany	The easiest way to estimate the reversals is to count the additional removals/reductions minus loss of carbon due to the event size, e.g. in the case of an ARR project, how many trees have been degraded/damaged by the event.
425	Debora Souza	Future Carbon Group	Brazil	Yes, this would be a good option, using the additional ERs minus loss event, in addition to using the accumulated buffer credits that were held in the VCS pooled buffer account since the project beginning.
426	ANONYMOUS #12	N/A	N/A	It should be flexible according to different local context. Consider also how you will hold the proponent liable 20 years after the project has stopped.
427	Inigo Wyburd	Carbon Market Watch	Belgium	- This could be a reasonable approach to adopt, if additional removals/reductions are quantified in the post-crediting period in a manner equivalent to how they were quantified during the crediting period, i.e. against conservative and regularly updated baselines, and taking into account any leakage.
428	ANONYMOUS #13	N/A	N/A	Shell supports quantification based on net credits issued.
429	Caio Gallego	Biofíllica Ambipar Environmental Investments	Brazil	Net accounting.
430	ANONYMOUS #14	N/A	N/A	The project proponent should be given the option to perform net accounting (more costly as more extensive inventories may be needed but could allow to valorize continued carbon removal after the end of the crediting period), or to stick with accounting of loss events only if preferred.
431	STX Group	STX Group	Spain	It is important to conduct the monitoring at a minimum cost for project proponents (e.g. allowing a remote sensing approach to conduct the monitoring activities).
432	Lynn Riley	American Forest Foundation	United States	<p>We believe reversals should be quantified by a “maintenance” approach, which we think may be in-line with the net-accounting approach proposed in the question. Rather than continuing to quantify and track additional removals/reductions, for which one would need to track a baseline, the project is no longer expected to generate additional removals/reductions after the crediting period, and thus no longer needs to demonstrate additionality nor a relevant baseline. Instead, the post-crediting period “baseline” should be the state of the carbon stored by the project at the time the crediting period ends. That state should be maintained through the project’s permanence period (i.e., 100 years), and dips below this level reflect emissions into the atmosphere.</p> <p>In other words, at the date a crediting period ends, there is a switch from generating additional carbon storage in comparison to a baseline, to maintaining the carbon stored in the project in comparison to the level of the project’s crediting period end date. This is kind of like transitioning from running a race against an opponent, in which success is defined as beating your opponent, to running a race against yourself, in which success is defined and not getting any slower than a set pace. When running against yourself, you no longer need to know how fast your opponent is; you only need to know the desired pace to compare to. In a similar way, only the carbon stock at the start of the post-crediting period and its value throughout the post-crediting-period years are relevant to monitoring for permanence. The crediting-period baseline does not need to be monitored in the post-crediting period.</p> <p>Should loss events against this “crediting-period-end” baseline occur, we propose that compensation in a similar format to the current buffer pool process be required. Perhaps a reasonable minimum period for which this must be assessed and compensations paid would be every 5 years through the permanence period, to match other related VCS cadences.</p>
433	ANONYMOUS #16	N/A	N/A	It is Agoro Carbon’s opinion that the quantification of reversal after post-crediting period contradicts to some extent with the existing definition of reversal, which is defined based on the net GHG benefit of the project or program during the project crediting period. If VERRA would like to introduce the new requirement of obligation of reversal quantification after the end of project longevity, and post-crediting period, we recommend to revise first the definition of reversal and to provide the guidance on the monitoring/quantification of project emissions/removals approaches in such a case. This will help to address the Option 4b and to define the most appropriate quantification mechanism.
434	Márcia Silva	Ibá	Brazil	Criteria should be established for using units from a global reserve maintained by Verra, based on the values retained in the buffer assessment of each project, followed by criteria for replenishing this reserve.

435	Diego Toledo	re.green	Brazil	Yes, the example provided in the question would be a good alternative, that is, the additional amount of CO2 sequestered since the last verification should be used to identify the magnitude of the reversal.
436	Carbonext	Carbonext	Brazil	The buffer recovery may be subject to advancing in time beyond the crediting period. In other words, the buffer generated during the crediting period can be reclaimed (progressively) only after demonstrating the project's integrity during the years without credit generation.
437	ANONYMOUS #20	N/A	N/A	Net accounting would make sense. It is unclear to us whether the same extensive field-accounting methods would be required for this calculation post-crediting period, or if Verra would adopt remote sensing as a means to account for carbon accumulation, or IPCC-informed growth curves for projects post crediting period. Otherwise, there may be an incentive issue, and responsibility on who will verify (i.e. auditors) and who is responsible to pay remains very unclear.
438	Bibiana Duarte	Systemica Net Zero	Brasil	Net accounting based on two evaluation periods, in which the period outside accreditation is additional and is evaluated according to the size of the event.
439	ANONYMOUS #22	N/A	N/A	Would need to understand Verra's proposed long term monitoring tool to answer this question sufficiently. How could changes to AFOLU buffer pools requirements be applied in post-crediting period?
440	Carla Zorzaneli	NBS Brazil Alliance	Brasil	Net accounting. The example provided in the question would be a good alternative, that is, the additional amount of CO2 sequestered since the last verification should be used to identify the magnitude of the reversal. The buffer recovery may be subject to advancing in time beyond the crediting period. In other words, the buffer generated during the crediting period can be reclaimed (progressively) only after demonstrating the project's integrity during the years without credit generation.
441	Zimmfor	Zimmfor Management Services Ltd.	Canada	Yes, this makes the most sense as even if the project is not claiming credits, the project would still be creating removals/reductions and therefore any reversals should only be counted if the net for the monitoring period is negative.
442	ANONYMOUS #23	N/A	N/A	In theory, net accounting would be a sufficient approach to quantifying reversals. However, this would depend on who is responsible for ensuring the project area adheres to the monitoring, reporting, and verifying requirements passed the crediting period.
443	Juliana Magalhaes	ClimeCo	Canada	Post-crediting period reversals should be accounted as additional removals/reductions minus loss event, and the additional value should be of the year when the loss event happened.
444	ANONYMOUS #24	N/A	USA	Net accounting seems to most accurately reflect the atmospheric effect of reversals plus ongoing removals, so that would be the appropriate quantification method.

**5b. If Verra introduced the monitoring agreement option (Option 'b' to question 4): If a reversal occurs in the post-crediting period, how should projects replenish the buffer pool (see Section 5.3.3 of the VCS**

Comment #	Name	Organization	Country	Comment
445	Livio Pierro	Face the Future	Netherlands	Look reply to 5a.
446	Mark Ritchie	Soils for the Future and CarbonSolve	USA	There should be options – assuming that monitoring reveals an actual net loss associated with the event compared to ongoing post-crediting period removals, proponents can use credits from other projects or buy other credits off the market. Assuming that avoidable and non-avoidable categories are clear, this should apply only to the avoidable category, because the project has already contributed to the buffer pool during its lifetime on the basis of its non-avoidable loss risk profile.
447	Eric Wilburn	NatureBridge	USA	Projects should not be required to replenish the buffer pool. The buffer pool exists to cover reversal events. It is the responsibility of the end buyer/retirer of the credits to have purchased a credit with strong permanence and/or a sufficient buffer pool, if the buffer pool is depleted, it is the responsibility of the buyer/retirer to replace that credit to meet their climate mitigation claim, not the project owner.
448	ANONYMOUS #6	N/A	N/A	We believe that 40 years is too long as a minimum crediting period for ALM projects. What happens to the monitoring agreement if the project elects to renew their crediting period? Is that possible? Would this void the monitoring agreement? Also, if the project had a crediting period of 40 years, and thus no monitoring agreement in place, by what mechanism will Verra enforce the monitoring requirements in the event that the project proponent stops reporting before the end of the crediting period? In other words, it would appear that a monitoring agreement is required regardless of the length of the crediting period.
449	ANONYMOUS #7	N/A	N/A	For unavoidable catastrophic loss/reversal (typhoon, etc) then the proponent should not be required to provide credits. For avoidable reversal, then yes, the proponent / land manager should be liable to provide credits to compensate. Otherwise credits generated from nature based solutions which may have a risk of avoidable reversal post-crediting become too high-risk and fail to meet definitions of high quality.
450	ANONYMOUS #8	N/A	N/A	It would be very difficult since there is no longer issuance. If a project proponent does not have another project, this will be an issue. Maybe they could replenish by buying from the market, but then rules should be defined on which credits are eligible. I do think there should be a distinction between avoidable and unavoidable, but I am not clear how you can enforce that in a developing country with weak regulatory systems.
451	Audrey Palomar	ecosecurities	Philippines	<p>If the reversal is catastrophic, the project should be allowed to provide credits from their other projects or purchase credits if these are of a similar type, quality, location, and vintage. If the project demonstrates that there are no credits available with the same conditions, then other options may be considered, such as:</p> <p>a) Meet less stringent criteria (i.e., type and vintage or type only); or                      b) Deduct credits from the next crediting period to replenish its buffer pool deposit. If the reversal is significant, deducting in tranches in the succeeding credit cycles may be explored.</p> <p>In the event of a non-catastrophic (and avoidable) loss event, apart from replenishing the buffer pool, the project should demonstrate how it improved the adaptive management plans and mitigation actions to prevent recurrence.</p>

452 ANONYMOUS #10	N/A	N/A	<p>We would oppose requiring project proponents to provide credits from other projects in the case of a reversal, as that would impose direct costs on local communities that had nothing to do with the reversal, and whose hard work and engagement are critical to the success of REDD+ projects. If a proponent has only a single project, they would be forced to buy from the broader market anyway. In that case, Verra should include some set of requirements: for example, credits that are CCP-labeled (once that is available), or other quality criteria, and potentially low-end price requirements.</p> <p>How project proponent will replenish the buffer pool? and how will project proponent be able to replenish and compensate for the carbon loss? Project proponent could provide credits from other projects but it is important to note that carbon stored in one place doesn't equal to carbon stored in another place, due to co-benefits could be different in each area. Project proponent could buy credit from another project but should be the same type of project and ideally in the same region.</p> <p>Even if, it is the result is the same at the end, requirements should differ for catastrophic vs non catastrophic event. Eventually, catastrophic events should be taking into account in the beginning and should not be included in credits calculations. As conservative approach.</p>
454 Debora Souza	Future Carbon Group	Brazil	<p>Yes, in the case of reversals, an alternative option would be to restore the land or provide credits from another project activity. From our point of view, this should not differ from catastrophic or non-catastrophic events.</p>
455 ANONYMOUS #12	N/A	N/A	<p>It should differ for catastrophic reversal, it cannot be held in the same regard as a project that has defaulted. Project proponents are not experts at purchasing credits and it is difficult to expect them to purchase credits, placing an unfair burden on many proponents. Many proponents are local community trusts or organisations that will struggle to comply here.</p>
456 Inigo Wyburd	Carbon Market Watch	Belgium	<ul style="list-style-type: none"> <li>- For non-catastrophic reversals, project proponents should provide credits of the same vintage and type (e.g. reduction vs removal), either from another of their project, or by purchasing them on the market. Project proponents that do not comply with this should be subject to an issuance ban covering their other projects (present or future) until they comply with this provision.</li> <li>- Unavoidable reversals could be dealt with in the same way as during a crediting period, drawing from the buffer reserve.</li> </ul>
457 ANONYMOUS #13	N/A	N/A	<p>Shell sees the most appropriate measure to be a requirement that projects replace their losses by purchasing equivalent credits from another Verra (or equivalent) project.</p> <p>In the case of non-catastrophic loss, the proponent of the project could purchase credits or use them from another registered project, and deposit full reversal.</p>
458 Caio Gallego	Bioflica Ambipar Environmental Investments	Brazil	<p>Proponents can buy credits from similar projects on the market or use credits from their other projects (in the second case, they should not be obliged as it could harm other uninvolved parties). In the case of proven catastrophic reversals, the proponent should not be required to replenish the buffer pool, ie, the pool account should take over. The possibility of legal agreements after the 20th year to recompose the stock by the 40th year through same or similar project activities should also be analyzed.</p>
459 ANONYMOUS #14	N/A	N/A	<p>It is understood that the buffer pool works like an insurance: every project contributes to the pool, but when there is a reversal observed there should not be a requirement to replenish the pool. In case the buffer pool is empty, it means non-permanence risks have been chronically under-estimated so that non-permanence tool requirements should probably be strengthened. It does not seem reasonable to differentiate between catastrophic and non-catastrophic events, as natural catastrophes are only one of the aspects covered by the non-permanence assessment and the buffer percentage. However, to avoid abuse or systematical under-estimation of risks by some project developers, it may be healthy to apply a penalty in case of reversal (as is the case for classic insurances). For example, if a reversal has occurred once for a developer, next projects are applied a "malus" for next non-permanence assessments. Or in case of reversal, a percentage of credits are taken from next issuance from the same developer.</p>
460 STX Group	STX Group	Spain	<p>Since the reversal will happen after the project crediting period, Verra can develop and maintain the insurance scheme and recover the reversed credits from the insurance. The credits for the insurance can be allocated from the buffer pool account.</p>
461 Lynn Riley	American Forest Foundation	United States	<p>We believe Section 5.3.3 of the VCS Program document Registration and Issuance Process could still be followed in the post-crediting period. Projects could be required to provide credits from their existing projects first (if they have existing projects of the same type), or other projects if they do not have any current projects of the same type as those reversed. The differentiations between catastrophic and non-catastrophic could still be held. In this way, Verra would be operationalizing horizontal stacking, which we believe to be a high-quality approach to handling reversals, as it allows assurance that the original impact is maintained for the full period intended. We would be interested in discussing with Verra ideas we have that could be operationalized by projects, Verra, or other entities around how horizontally-stacked compensations could be funded long-term, past the project's lifetime, through funds set aside to grow at each credit issuance, enough to ensure funding for compensations and horizontal stacking in the future.</p> <p>Another approach worth exploring may be horizontal stacking using credits that are inherently durable, such as geologic storage credits. For example, at the first reversal in the post-crediting period for an AFOLU project, the entity responsible for horizontally stacking for that reversal could be encouraged or required to purchase a geologic storage credit as the stacked credit, thereby ending the need for any future stacking for those credits.</p>

462 ANONYMOUS #16	N/A	N/A	<p>Overall, Agoro Carbon believes it will be difficult to implement the mechanism of monitoring and accounting for reversals after the end of the project's longevity. We believe it will also be hard to enforce, and therefore we recommend addressing this issue with great care in order not to discourage the carbon market and to ensure environmental integrity of the projects at the same time.</p> <p>If such a mechanism will be established, with specific requirements for monitoring and accounting for reversals, we recommend to allow the project developers to have an option to use any VCUs for compensation purposes in their buffer account(s) in case of reversal, as all the VCUs are per definition equal in quality and their contribution to climate change mitigation. This approach shall be applied when a reversal occurs (see our comment above) as per existing guidelines. This will ensure flexibility for the project developer, and, at the same time, maintain the environmental integrity of the projects.</p>
463 Márcia Silva	Ibá	Brazil	<p>Catastrophic reversals are already partially accounted for in the buffer; therefore, there should be a discount rate if the loss exceeds a certain threshold in the mitigation project.</p> <p>Regarding the provision of credits for reversals, there should be different payment methods, for example, considering the transfer of credits between projects of the same proponent.</p>
464 Diego Toledo	re.green	Brazil	<p>It sounds unfair to project proponents who would be penalized by reversals on lands that are no longer under their management control. We suggest that the buffer pool should be used for this purpose, as the project developer has a limit to recover VCUs from the buffer pool after the crediting period.</p>
465 Carbonext	Carbonext	Brazil	<p>Firstly, it is indeed important that the treatment given to catastrophic losses is not the same as that given to non-catastrophic losses, precisely because one is avoidable while the other is not. In the case of catastrophic losses, simple actions for mitigation of the affected areas can be solicited.</p> <p>Regarding a scenario where non-catastrophic losses exceed the amount retained in the buffer, it is possible to consider compensation through other projects by the same proponent. Alternatively, actions compensating for the loss (reforestation, acquiring additional credits from the market without retirement, insurance etc.) can be required.</p>
466 ANONYMOUS #20	N/A	N/A	<p>If we understand this correctly and went with net accounting method, then replenishing the buffer pool should only be an issue if the reversal event completely wipes out the project-specific buffer and the net accounting does not compensate for the loss.</p> <p>In principle, we believe that Verra's buffer pool should not necessarily be project specific, but should be common, as such, project proponents should not be able to redeem buffer credits. This would help insure future losses of various projects.</p> <p>Also in principle, we agree that avoidable and unavoidable reversals should be treated differently, even during the crediting period. However, post-crediting period obligations to purchase on market price can make project development an even stronger liability to investors and therefore disincentivize the development of these projects.</p>
467 Bibiana Duarte	Systemica Net Zero	Brasil	<p>Both options would be viable. The most accessible would be the purchase of available credits. The compensation could be independent of the type of reversal.</p>
468 ANONYMOUS #22	N/A	N/A	<p>Agree with reversal during post-crediting being replenished by credits from other VCS credits or credits purchased from broader VCM.</p>
469 Carla Zorzanelli	NBS Brazil Alliance	Brasil	<p>There should be lower penalty (%) for catastrophic reversals vs non-catastrophic during the post-crediting period.</p> <p>Proponents can buy credits from similar projects on the market or use credits from their other projects (in the second case, they should not be obliged as it could harm other uninjured parties). In the case of proven catastrophic reversals, the proponent should not be required to replenish the buffer pool, ie, the pool account should take over. It sounds unfair to project proponents who would be penalized by reversals on lands that are no longer under their management control. We suggest that the buffer pool should be used for this purpose, as the project developer has a limit to recover VCUs from the buffer pool after the crediting period.</p>
470 Zimmfor	Zimmfor Management Services Ltd.	Canada	<p>For catastrophic reversals, these should come from the buffer pool, and not need to be replenished. As this question only relates to quantifying reversals post-crediting period, a large enough sum of buffer credits should have been deposited throughout the crediting period to cover large reversals due to these projects having a higher non-permanence risk rating and therefore a larger deposit of buffer credits. For non-catastrophic reversals, there should be an option to either purchase credits from the voluntary carbon market or add additional lands to the project and undergo a subsequent verification to generate additional credits from the existing project.</p>
471 ANONYMOUS #23	N/A	N/A	<p>Project proponents should be required to purchase VCUs from the broader market to replenish canceled credits from the buffer pool. Verra should consider setting requirements for the type of VCUs purchased to replenish the buffer pool, to ensure the purchased VCUs are risk averse (i.e., AFOLU emission reduction VCUs). In alignment with section 5.3.3 of the VCS Program document Registration and Issuance Process, the set requirements to replenish buffer pools should indicate stricter penalties for non-catastrophic (i.e., avoidable) reversals compared to catastrophic (i.e., unavoidable) reversals.</p>
472 Juliana Magalhaes	ClimeCo	Canada	<p>The requirement should be different depending on the cause of reversals. I think Verra should exclude the term catastrophic, as it relates to the magnitude of disturbance events, and classify the reversals based on how much control the project proponent has over the event (Unavoidable versus Avoidable). Since avoidable reversals are considered in the risk tool, project proponent must replenish those credits, either by collecting from their other projects or purchasing credits. Nevertheless, the same requirement should not be applied if there is strong evidence that the reversal event was unavoidable. In that case, there should be a common insurance for all projects. Part of the buffer pool should be allocated for unavoidable events.</p>
473 ANONYMOUS #24	N/A	USA	<p>Our view is that any source of ton-for-ton credits should be acceptable, whether from the entity's other projects or from the broader market. The reversal loss is the same whether the precipitating event was avoidable or not, so the compensation requirement should be equivalent.</p>

**6. Verra is exploring non-permanence risk insurance. We know that some VCS projects have insurance that would provide financing in the event of a reversal to help restart the project (e.g., to buy seedlings).**

Comment #	Name	Organization	Country	Comment
474	Livio Piero	Face the Future	Netherlands	Again, we are facing doubts from the public about the effectiveness of carbon projects as climate mitigation measures and their factual permanence. Therefore, I would make this a requirement and not an option since it is of core importance to assure projects' permanence hence credibility.
475	Mark Ritchie	Soils for the Future and CarbonSolve	USA	NP Risk Insurance should NOT be required. Not all projects face the possibility of catastrophic loss (e.g., soil carbon projects n grasslands that are highly unlikely to be used as croplands due to soil depth or topography and an insurance payout might cover interrupted revenue streams but would not likely increase the success of a restart of the project. For such projects, their non-avoidable risk levels are already low – why pay for something you don't need. Consequently it should be an optional mitigation measure.
476	Eric Wilburn	NatureBridge	USA	I have worked in the financing of nature-based carbon projects for multiple years, and while this insurance would be ideal, there is not an entity today that I know of that is willing to underwrite all of the reversal events that would need to be covered in order for Verra to require this for all projects.
477	ANONYMOUS #5	N/A	N/A	I think making it an option--again, the market will signal if it values a project that is insured in that way.
478	Josiah McClellan	Land O'Lakes	United States	Non-permanence risk insurance should be an optional mitigation measure (option 2). Insurance instruments in the voluntary carbon market, especially for ALM projects, remain highly experimental and expensive. Making this a requirement would create a barrier to less-capitalized participants, and deter grassroots project development by under-served communities.
479	ANONYMOUS #6	N/A	N/A	This should be optional. Insurance options remain nascent and not every (project activity + location + project design) would be considered insurable at this time. Or, the cost may be prohibitive. The insurance should be considered a mitigation measure, and could also be considered as a replacement for the monitoring agreement discussed previously.
480	ANONYMOUS #7	N/A	N/A	Availability and cost of viable risk insurance may create a barrier to entry. At this point in time, the second approach is more appropriate, and as more insurance products are created, this could be revised to be a requirement in future versions of the VCS.
481	ANONYMOUS #8	N/A	N/A	Yes. You could start with optional and see how it works. It is already extremely costly to do a projects, and those with lower risk my opt not to get insurance.
482	Audrey Palomar	ecosecurities	Philippines	Option 2 is preferred to give projects freedom of decision whether non-permanence risk insurance is appropriate. Making Option 1 a requirement may be unnecessary for projects with a lower risk of reversals.
483	Sheldon Zakreski	Independent Consultant + BluEarth Carbon Development	USA	I recommend Verra give project proponents the option to address non-permanence risk through the purchase of insurance. This is a feature that ACR incorporated into its Program Standard, so a precedent exists. The market for this insurance product is nascent and the risk of making it a requirement is that projects find it cost prohibitive or a provider unwilling to insure the project.
484	Daniel Arturo	ecosecurities	Germany	Option 2 is better due to gives more flexibility to project developers, specially in case where the risks are very low.
485	Kris Hendrickx	Global Evergreening Alliance	Australia	NP Risk Insurance should not be required. Not all projects face the possibility of catastrophic loss. It should be an optional mitigation measure.
486	Indradeep Das	ReNew	India	Making this a mandatory insurance would ensure that the methodology is protected, but would also make it less flexible. We suggest it be looked as an optional measure in the NPRT.
487	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	<p>We suggest 2) to begin with. Overall, we are a big supporter of the move to non-permanence risk assurance and think that should become part of AFOLU project development. We also would encourage Verra's exploration in this field to kickstart this type of financial innovation. Nevertheless, our understanding is that the non-permanence insurance market is at its infancy and we think it will take a while before it is widely available to the vast majority of VCS project proponents.</p> <p>Also, we know mature financial players such as large insurance companies operate in a different world than most of the Verra projects. Many would not have developing country operations and would struggle to onboard customers from those countries through their KYC operations. Most would only accept counterparty risk from the largest of VCS project owners.</p> <p>In short, all the investment and country risk barriers that exist for developing AFOLU projects in the first place also apply here. Verra should therefore be careful to impose requirements on projects that cannot be reasonably achieved.</p>
488	ANONYMOUS #11	N/A	N/A	<p>1.As project proponents, we don't think Insurance should be made a requirement, it should be kept optional. As they tend to be expensive and not all projects can afford it.</p> <p>2. Costs incurred for a mandatory insurance will be high and make many projects unviable. Will VERRA standardize this in some way or will be the onus of the PP? It should not be a mitigation. This is unfair to projects with large ROIs who can afford the insurance premiums and will be very difficult for small projects. The risk assessment should look more at the quality of the project as mitigations</p>
489	Debora Souza	Future Carbon Group	Brazil	We agree that this should be an optional mitigation measure that would 1) replace the buffer credits and the non-permanence risk tool, or; 2) provide a very high discount in the total risk, which could result in a buffer of less than the minimum 10% threshold in this case.
490	ANONYMOUS #12	N/A	N/A	Certainly optional or even exclude it as there is already a mandatory buffer contribution, this requirement will increase projects costs.
491	ANONYMOUS #13	N/A	N/A	Shell sees this as a potential requirement depending on the risk score of the project. For high scores, it could be mandatory and for medium-low scores it could be optional mitigation measure.
492	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	Yes, agreed. Should adopt measure 2), optional mitigation. Requiring insurance is not appropriate, not only because of the cost (hence the importance of considering it as a mitigation measure) but also because of the lack of insurance to cover these activities.

493 ANONYMOUS #14	N/A	N/A	Insurance for a 100-year period in the context of global warming would be extremely costly and may prevent project development. In addition, what would the insurance provide in case of reversal exactly: money to replant? Money to replenish buffer pool? It does not make sense to replenish the buffer in case of reversal events. Wouldn't an insurance, in addition to the buffer system, duplicate protection against non-permanence? It would be better if it is optional and instead of the buffer.
494 STX Group	STX Group	Spain	Agree with both options. As mentioned in (5b) the credits for the insurance can be allocated from the buffer pool account. If Verra develop an insurance scheme outside of the buffer pool, the project developer should have the option to select it (Option 2).
495 Lynn Riley	American Forest Foundation	United States	<p>We agree with the approach to make this an optional mitigation measure in the non-permanence risk tool. Adding mitigation measures to the non-permanence risk tool can incentivize more projects (as it can help ease the difficulty of producing a viable carbon project in which there are inherent risks, in a reasonable way that ensures the impact stays in-tact). Non-permanence risk insurance is a reasonable and viable solution that some projects could pursue. If made a requirement, that could create an untenable burden for some project proponents.</p> <p>Additionally, we appreciate Verra's strengthening of its requirements by the proposed removal of two mitigation options (for adaptive management plans and for net positive impacts on local stakeholders). With the removal of these mitigation options, we believe some projects that may have been relying on such mitigations to create a viable project may now face unviable projects. We propose Verra explore and consider additional mitigation options to these and other risk areas in the non-permanence risk tool, such that non-permanence risk can be addressed and mitigated without pushing projects out of viability. One idea would be a mitigation for grouped projects that have significant portfolios of many landowners enrolled at once. Having such a portfolio means that many of the risks considered in the tool are unlikely to apply to all landowners at once, and therefore, the overall project risk is likely lower than a single-landowner project. Reaching a certain threshold of portfolio diversity could be a potential non-permanence risk mitigation.</p>
496 ANONYMOUS #16	N/A	N/A	It is Agoro Carbon's view that the decision to have or not to have any type of private insurance related to project operations and risks shall be made only by the project developers voluntarily. Every project is different in their technology applied, geographies, financial situation and risk profile. In order to ensure a leveled playing field between larger and smaller projects and developers, we strongly advise against making this a requirement, but believe that there is added value to list this as an optional mitigation measure in the non-permanence risk as a tool to reduce the overall risk score.
497 Márcia Silva	lbá	Brazil	If implemented, this measure should be optional and not mandatory. Making it a mitigation measure will offer more opportunities to project proponents, offering an additional option for assurance in case of reversals.
498 Diego Toledo	re.green	Brazil	Option 2), an optional mitigation measure in the non-permanence risk tool, is a good idea indeed. Option 1) may be unfeasible, as ARR projects, for example, are very expensive in initial stages, and they are already penalized by the non-permanence risk tool. An insurance requirement could make many projects financially unfeasible, as insurances for these projects may be very costly.
499 ANONYMOUS #19	N/A	N/A	optional mitigation measure as not all projects are located in jurisdictions where this insurance is available or cost effective.
500 Carbonext	Carbonext	Brazil	The most interesting proposal would be to have insurance as an optional mitigation measure (option 2). Making it mandatory could lead to complications and discourage proponents from developing carbon projects, especially during the implementation initial processes. In case of the project proponent opts to adopt the risk insurance, a risk level abatement should be granted, as a mitigation measure.
501 ANONYMOUS #20	N/A	N/A	We agree in principle that having insurance can reduce natural risk in the non permanence risk pool, but Insurance would likely discriminate by countries based on natural risks – therefore, again, potentially deterring investment in least developed countries. For this reason it should remain optional.
502 Bibiana Duarte	Systemica Net Zero	Brasil	Initially it can work as an optional measure
503 ANONYMOUS #22	N/A	N/A	Non-permanence risk insurance should be an optional mitigation measure as different project types and project proponents will require different levels of assistance. The project proponent may utilize an internal buffer for organizational insurance.
504 Carla Zorzanelli	NBS Brazil Alliance	Brasil	Yes, we agree. Should adopt measure 2), optional mitigation. Requiring insurance is not appropriate, not only because of the cost (hence the importance of considering it as a mitigation measure) but also because of the lack of insurance to cover these activities. Option 1) may be unfeasible, as ARR projects, for example, are very expensive in initial stages, and they are already penalized by the non-permanence risk tool. An insurance requirement could make many projects financially unfeasible, as insurances for these projects may be very costly.
505 Zimmfor	Zimmfor Management Services Ltd.	Canada	It should remain optional as a mitigation measure, as some Proponents will have the processes in place of their own as a form or insurance, and they should not be forced to purchase this insurance from Verra in this case.
506 ANONYMOUS #23	N/A	N/A	Verra should consider making this an optional mitigation measure in the non-permanence risk tool.
507 Juliana Magalhaes	ClimeCo	Canada	I agree with the proposal of a non-permanence risk insurance, but for now, I think this should be an optional mitigation measure. Having this insurance as a requirement could make small-scale reforestation projects unfeasible.
508 ANONYMOUS #24	N/A	USA	The market for non-permanence risk insurance is too underdeveloped to make it a requirement at this stage. Verra should make it an optional approach in the near term.
727 Sheldon Zakreski	BluEarth Carbon Development		Insurance- I recommend Verra give project proponents the option to address nonpermanence risk through the purchase of insurance. This is a feature that ACR incorporated into its Program Standard, so a precedent exists. The market for this insurance product is nascent. Therefore, it is not advisable to make it a requirement and it instead should be optional.

## Updates to requirements for when project construction and upstream emissions increases must be included in VCS Methodologies

1. Should emissions from before the emissions reductions or removals start be included in the overall project emissions accounting for all project types?				
Comment #	Name	Organization	Country	Comment
509	Lasse Leipola	Finnwatch	Finland	Yes.
510	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
511	Eric Wilburn	NatureBridge	USA	Yes
512	ANONYMOUS #3	N/A	N/A	YES. CCS projects require large installations (e.g. pipelines, transport vessels, capture facilities) which involve large CO2 emissions. The Norwegian Longship project has published a carbon footprint of around 10% after its first 8Mton CO2 injection after 10 years. This means 800.000 ton of CO2 emissions. The majority is originating from the embodied emissions. (Page 35: <a href="https://gassnova.no/app/uploads/2020/11/Gassnova-Developing-Longship-FINAL-1.pdf">https://gassnova.no/app/uploads/2020/11/Gassnova-Developing-Longship-FINAL-1.pdf</a> )
513	ANONYMOUS #5	N/A	N/A	Yes
514	ANONYMOUS #6	N/A	N/A	In some cases, this would be reasonable. During methodology development it should be assessed whether the project activity generally would increase life-cycle GHG emissions outside of the GHG assessment boundary of the methodology.
515	ANONYMOUS #7	N/A	N/A	This is dependent on project type, and on the state of development of the associated technology. For established technologies then yes, emissions from construction should be accounted for. It would be ludicrous to award credits to a technical solution where the carbon footprint of construction is not taken into account - and to do so would fuel public argument that carbon crediting schemes are fake. For innovative, experimental, developing technologies and proof of concept projects, there is a valid argument that they can be excluded from this requirement for initial research and construction. Quite how this can be defined is complex and would require further consultation.
516	ANONYMOUS #8	N/A	N/A	I am not clear how this would apply to AFOLU projects, clarification would be helpful.
517	Amélie Gelbmann	ecosecurities	Switzerland	While it is essential to consider emissions estimation within the methodology, it should also incorporate a practical approach to easily estimate emissions for common and frequent uses, along with related technologies. However, it's crucial to establish clear boundaries for these emissions in the methodology, acknowledging that it may not be applicable to all projects, especially smaller scale and community initiatives. For instance, certain projects, like community cookstove initiatives, could potentially exclude certain emission sources such as fabrication and transportation, especially if the emissions reduction for that specific project is already notably low.
518	ANONYMOUS #10	N/A	N/A	Yes

519 Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	<p>The inclusion of upstream emissions impacts is a challenging, non-trivial task. The tracking of scope 3 GHG emissions through value chains has improved over the years but this practice is still subject to serious challenges and inconsistencies. To require it be introduced for all carbon methodologies/project types is therefore to be considered very carefully.</p> <p>Risks here include arbitrary analysis, conducted at a project level, without consistency across project submissions; challenges in drawing boundaries around the “upstream” GHGs and thus more arbitrary and inconsistent applications; variances in the upstream GHGs across different value chains – whereupon methodologies’ evaluations (done on a sector wide basis) would be inexact then applied to different products’ supply chains; uneven access to supply chain data, which would penalize those projects whose data access was more robust (they would incur more GHGs upstream to amortize); the list is quite extensive – these are illustrative examples of the risks VCS would be introducing.</p> <p>It would ideal if VCS were able to conduct some sector analyses (e.g. for transport, energy efficiency etc) to assess whether the level of materiality (e.g. 5%) of upstream GHGs is likely to be relevant – and if so then require that methodologies/projects in these sectors incorporate this diligence. This would avoid asking all methodologies and all projects to undertake upstream GHG evaluations when the answer to such challenging analyses would be to find they were de minimis after all.</p> <p>The same question as to how to tackle ancillary GHG impacts arose during one of the Gold Standard DMRV working group discussions – when comparing the GHG impacts of applying digital MRV over conventional approaches. In this case, rather than requiring all DMRV to consider the GHG impacts of applying the DMRV technologies, it was realized that there are really only a few obvious DMRV technologies whose GHG impacts are significant e.g. proof of work blockchain. It was then realized that it was wiser to single out those DMRV technologies where such broader GHG diligence would be required – rather than bluntly requiring all DMRV technologies to provide that their relative GHG impact (over non digital MRV) was de minimis.</p> <p>Correspondingly, why would VCS not undertake a similar centralized analysis itself rather than requiring all projects and all methodologies to conduct a complex, costly exercise when the vast majority of cases is going to result in a de minimis conclusion?</p> <p>When VM0038 was developed, we did review the GHG impact from upstream emissions and, across a discussion with 100 stakeholders as the methodology was developed, realized that upstream vehicle GHG impacts were de minimis compared to the tailpipe emissions. So the methodology focused on the ERs comparing baseline tailpipe emissions from fossil fuel cars and electricity impacts from EVs. This was achieved using some decent, well published sources which detailed a car’s LCA carbon footprint. Any new VCS requirements to start completing entire value chain scope 3 GHG accounting would have been prohibitive: a methodology development team (whose scope typically focuses on the technology innovation at one point in a value chain) would also not typically have access to upstream data upon which to conduct such an assessment. So the way in which VCS might require project/methodologies to conduct such assessments (e.g. by requiring certain emission factors be applied to the volume of materials or other upstream data inputs) could result in an unworkable process. And VCS would close down a whole set of VCI issuances in projects whose Pre project emissions can be included only when the same quantum is also added as part of baseline emission. Otherwise, it would inaccurately represent the project emission quantum and may understate the emission reduction achieved through project activities. Quantification methodology for pre-project activity emissions has to be applied in baseline. Only in case of any adverse fallout on project activity including any natural calamity/forest fire on which project proponent has no control, then a methodology deviation has to be worked out basis such contingency situation. Verra should be flexible to make amendments in project emission quantification process in case of any unforeseen situation within project boundary.</p>
520 Indradeep Das	ReNew	India	<p>Outside project boundary emissions are much harder to measure with certainty by project proponents. So, they should only be included if upstream emission sources are significantly higher than in the baseline. Also, a materiality threshold should be applied to make sure the effort is worthwhile. To this extent if Vera could authorise certain standardised default values for accounting for such emissions that would make it much easier.</p>
521 Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	<p>It depends on the scale of such emissions, set a threshold</p>
522 ANONYMOUS #12	N/A	N/A	<p>- Yes, including upstream emissions from a project gives a more transparent and holistic assessment of a project’s overall environmental impact. We believe it is key to take into account the entire project’s emission life cycle, for example; emissions from industrial processes, project installation, raw materials, construction, equipment fabrication and transportation.</p> <p>- Including upstream emissions can lead to more accurate crediting of a project’s impact and improve transparency in carbon accounting, enabling buyers/ end-users to accurately assess the project’s climate impact.</p>
523 Inigo Wyburd	Carbon Market Watch	Belgium	<p>Shell sees this as conservative; however, if it can be demonstrated that the project had similar or fewer upstream emissions than what would have occurred in the baseline, then the project should not have to account for these emissions.</p>
524 ANONYMOUS #13	N/A	N/A	<p>Technology-based projects that build large greenfield industrial facilities would be most likely impacted. Shell sees this as consistent with many AFOLU methodologies that require quantification of land-prep emissions.</p>

525	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	Considering AFOLU projects, when the start of the project is marked by the date on which additional emissions reductions/removals begin, previous emissions should not be accounted for as they would be part of the baseline scenario.
526	STX Group	STX Group	Spain	This emission might be more appropriate for the other project types than ARR and REDD+ projects. This is more applicable for energy industrial, building facilities, and community-based projects (e.g. cookstoves, water filters). Apart from that, the upstream emission should be clarified in each methodology or module/ tool.
527	Lynn Riley	American Forest Foundation	United States	We agree that emissions from before the emissions reductions or removals start are still relevant to the project, with relevant being defined by ISO 14064-2 as any GHG sinks, sources, or reservoirs that are controlled, affected, or related to the project activities. "Related" in this context is defined as SSRs that flow into or out of the project activity, which matches what Verra is describing as upstream and construction emissions. This helps meet the ISO 14064-2 and Verra principle of completeness. We suggest that Table A.3 in ISO 14064-2 could be a helpful reference for methodology developers when determining which SSRs are relevant to include or exclude in accounting. For example, the table shows that if the SSR can be demonstrated to not change between project and baseline, then it can be excluded from accounting unless there are reasons it might be considered high risk.
528	Márcia Silva	Ibá	Brazil	Upstream emissions should not be accounted for in AFOLU projects, as the greater risk of occurrence of emissions analogous to upstream emissions already associated with these projects are already considered in leakage. This action must be better studied, as it involves a very large number of production chains that are not necessarily linked to the carbon project. Charging the project for upstream emissions will make the entire data collection process much more difficult. Excessively bureaucratic processes can discourage the projects development.
529	Diego Toledo	re.green	Brazil	We understand that only the emissions after the project starting date should be included if relevant. The inclusion of the emissions should consider their relevance for the overall removals or reductions. For example, in an ARR project, only N-fertilization and fossil fuel used in mechanized activities related to project implementation should be analyzed, as these emissions are directly related to project activities. For harvesting activities, the emissions due to mechanized extraction could also be analyzed. If these emissions exceed 5% of the expected carbon stocks at the end of the crediting period, they are included in the Net GHG removals calculation.
530	Carbonext	Carbonext	Brazil	Not at all, it would make little to no sense to include these emissions from before the project started regarding AFOLU (REDD+, ARR) projects
531	ANONYMOUS #20	N/A	N/A	No response
532	Bibiana Duarte	Systemica Net Zero	Brasil	Only without are significant or exceed a minimum
533	ANONYMOUS #22	N/A	N/A	No, emissions from before the emissions reductions or removals start should not be included in the overall project emissions accounting.
534	Carla Zorzanelli	NBS Brazil Alliance	Brasil	Not at all, it would make little to no sense to include these emissions from before the project started regarding AFOLU (REDD+, ARR) projects. Considering AFOLU projects, when the start of the project is marked by the date on which additional emissions reductions/removals begin, previous emissions should not be accounted for as they would be part of the baseline scenario.
535	Julie Kelleher	3Degrees Group, Inc.	USA	<p>3Degrees encourages Verra to only require the inclusion of emissions that would not have occurred under the baseline scenario rather than all upstream and construction emissions. Voluntary carbon projects are meant to reduce emissions against a business-as-usual scenario. Attributing all upstream and construction emissions to the implementation of the project activity while ignoring emissions that would have otherwise occurred under the business-as-usual scenario will lead to inaccurate quantification of emissions reductions from the project.</p> <p>Additionally, Verra should provide guidance on how to account for various data integrity and life cycle boundary complexities that are not addressed as part of this initial consultation. It is unclear how projects will be expected to account for factors such as varying lifetime of equipment, ongoing maintenance requirements, and data access limitations when calculating upstream emissions. Furthermore, projects often rely on third-party contractors or proprietary products to determine upstream emissions, which can lead to data quality issues. It may prove extremely challenging to collect accurate data and measurements for such emissions and for Verra to generate emissions factors for protocol-specific activities such as polymers or replacement cover gasses.</p>
536	Zimmfor	Zimmfor Management Services Ltd.	Canada	Emissions from before emissions reductions or removals start should only be included if they are directly related to the implementation of the project activity.
537	ANONYMOUS #23	N/A	N/A	Yes, emissions from before the emissions reductions or removals start should be included in the overall project emissions accounting if those emissions are relevant.
538	ANONYMOUS #24	N/A	USA	Yes.

## 2. What conditions might be relevant when considering whether to include or exclude these emissions?

Comment #	Name	Organization	Country	Comment
539	Lasse Leipola	Finnwatch	Finland	Upstream and construction emissions from all project types should be included as they directly influence the overall quantity of the benefit to climate (i.e. what should be credited).
540	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
541	Eric Wilburn	NatureBridge	USA	Most pertinent to technology based removals and the historical emissions associated with R&D.
542	ANONYMOUS #5	N/A	N/A	Whether the products/activities were created new for the project (e.g., what if a new, small biochar company buys a small, older set of machinery from a bigger company that has upgraded--I'd suggest they don't need to count it). However, I understand that introduces more complexity and possibly difficult verification.

543 ANONYMOUS #6	N/A	N/A	If project activities will increase life-cycle GHG emissions outside of the project boundary, then on a sector-by-sector basis Verra should decide whether these negative impacts should be assessed at the project level or at the sector level (leading to default deductions at the project level).
544 ANONYMOUS #7	N/A	N/A	For innovative, experimental, developing technologies and proof of concept projects, there is a valid argument that they can be excluded from this requirement for initial research and construction. Quite how this can be defined is complex and would require further consultation.
545 Amélie Gelbmann	ecosecurities	Switzerland	<p>It is practical to treat these emissions as estimated values and apply a conservative rounding-up approach. It's unnecessary and impractical to expect exact calculations down to the decimals for all construction and upstream emissions, especially without the same level of assurance as monitored data.</p> <p>To determine the relevance of including or excluding these emissions, factors such as project size (small-scale/large-scale) and estimated emissions reduction (ER) should be taken into account. It might be appropriate to limit the scope to higher ER profiles that encompass these emissions, while excluding community projects where emissions related to fabrication and transportation could be significant due to widespread distribution.</p> <p>Regarding the proposed rules, it seems that they primarily focus on emissions related to concrete and steel. However, it's essential to ensure that the rules are comprehensive and encompass other significant emission sources, avoiding overlooking emissions from various construction materials and processes.</p>
546 Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	As above re #1 response, VCS could conduct diligence to evaluate whether sectors are likely to have significant upstream GHG impacts. Rather than requiring all sectors to conduct this diligence, VCS should ID those sectors where this is already obviously material and limit the requirements to these sectors
547 Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	<p>Conditions:</p> <ul style="list-style-type: none"> <li>•if upstream emission sources in the project activity are likely to be significantly higher than in the baseline.</li> <li>•if they are material (this seems to be adequately covered through the de minimis requirement).</li> </ul>
548 ANONYMOUS #12	N/A	N/A	A percentage of the first 10 years of emissions reductions of the project e.g. 5%
549 ANONYMOUS #13	N/A	N/A	See answer to 1.
550 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	It is relevant to consider emissions classified as significant according to VCS Standard rules, which are related to the project activities and which have been generated by the project proponent. Furthermore, when they occur demonstrably due to the activity/existence of the project (and which would not occur without the project).
551 STX Group	STX Group	Spain	Verra can set some thresholds for upstream emissions. These conditions should be included in each methodology.
552 Lynn Riley	American Forest Foundation	United States	<p>Practicality, cost-effectiveness, whether the SSR is a net source over the project period. It would be good to avoid creating such burdensome procedures that carbon projects are no longer viable). From ISO 14064-2, A.3.2.1: "Ultimately, the decision whether to monitor or estimate an SSR directly may be based on the monitoring effort (costs) versus the significance of the impact on GHG reductions.</p> <p>Exclusion of GHG sources from quantification may also be justified when comparisons of the project and baseline scenario show no change from baseline scenario to the project. In the case of GHG removal enhancement projects, a GHG source and/or sink may be excluded from quantification requirements if the project proponent can demonstrate that the GHG source and/or sink is not a net source of GHG emissions/removals over the project period."</p>
553 Márcia Silva	Ibá	Brazil	For non-AFOLU projects: If these emissions are considered, it is necessary to regulate how these calculations will be carried out and what input data will be used, especially for determining de minimis emissions, which are those that will not be accounted for. It would also be essential for there to be criteria that would allow attributing the eventual construction of a plant (upstream) to a specific project. In the absence of such a cause-and-effect relationship, upstream emissions should only be considered if the use of the respective product in the project is recurrent and occurs in high proportions in relation to the climate benefit generated by the project.
554 Diego Toledo	re.green	Brazil	The 5% threshold for the minimis emissions is ok.
555 Carbonext	Carbonext	Brazil	Emissions from before the project start should always be excluded at least for AFOLU (REDD+, ARR) projects
556 Jacob Penner	The Nature Conservancy	United States	<ul style="list-style-type: none"> <li>•The added complexity of accounting for new GHG emissions/sources and its impact on the costs of project development and monitoring versus what may be a very small change in VCU.</li> <li>•Is an increase in emissions that occurs prior to a project's start date or outside of a project's geographic footprint better accounted for as emissions due to leakage? Can construction and upstream emissions be accounted for as leakage without adding these sources to a Project GHG Boundary?</li> </ul>
557 ANONYMOUS #20	N/A	N/A	No response
558 Bibiana Duarte	Systemica Net Zero	Brasil	Its significance over the total reductions or removals
559 ANONYMOUS #22	N/A	N/A	Pre-start date emissions should not be considered and excluded.
560 Carla Zorzanelli	NBS Brazil Alliance	Brasil	It is relevant to consider emissions classified as significant according to VCS Standard rules, which are related to the project activities and which have been generated by the project proponent. Furthermore, when they occur demonstrably due to the activity/existence of the project (and which would not occur without the project). The 5% threshold for the minimis emissions is ok.

561 Zimmfor	Zimmfor Management Services Ltd.	Canada	A time frame should be defined for what is considered "before emission reduction or removals start".
562 ANONYMOUS #23	N/A	N/A	- We agree with the proposed approach. These emissions should be included if they <input type="checkbox"/> are not approximately equivalent between the baseline and project scenarios, <input type="checkbox"/> are not de minimis, and <input type="checkbox"/> occur during, or prior to the project start.
563 ANONYMOUS #24	N/A	USA	The proposed approach (to assess whether such emissions are de minimis) seems practical, easy to apply, and accurate.

### 3. Do you agree with the proposal to assess whether such emissions are de minimis by comparing to the estimated ERRs for the first seven years of project activities to enable a standardized calculation

Comment #	Name	Organization	Country	Comment
564	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
565	Eric Wilburn	NatureBridge	USA	Worth an assessment yes.
566	ANONYMOUS #3	N/A	N/A	CCS projects are large and a LCA (life cycle analysis) would not be a hurdle for these projects. Therefore a LCA is recommended for CCS projects.
567	ANONYMOUS #5	N/A	N/A	I see PDDs often just declare things as de minimis. If one has to do the calculations anyway, just have them present it and maybe even subtract it regardless of the amount.
568	ANONYMOUS #6	N/A	N/A	Seven years is arbitrary. The temporal scope of assessment should reflect the project type and activity, considering the temporal scope of project activities and counterfactual baseline activities (e.g., if construction of the project infrastructure had not occurred, would something else have been constructed? What is the lifetime of each scenario?).
569	ANONYMOUS #7	N/A	N/A	Yes
570	Amélie Gelbmann	ecosecurities	Switzerland	<p>There should be a consistent approach for including emissions in all methodologies and sectors, similar to how "Project emissions" are handled. Comparing emissions to estimated emissions reduction (ER) might not be the most appropriate way to assess their significance. Instead, the standard should specify the calculation method for such emissions within the methodology.</p> <p>Some team members don't agree with the proposed comparison assessment. Basically if a project is entitled to include the emission based on the criteria set, then they have to calculate it. Determination of de minimis should not only be based on the fact that this emission is low compared to the estimated ERRs. What if the nature of the project is not a big reduction, will they then be accounted to include this emission which will reduce more of their reduction. Please refer to small scale and/or community-based project. The standard calculation and determination of de minimis should be done specific for different methodology/project type.</p>
571	Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	<p>If a project is already allowed per the Standard to issue credits over a 10 or 7+7+7 year period – and it is now proposed amortize upstream GHG impacts over the first crediting period – then surely the first crediting period should be the time period selected for that amortization. That is 7 or 10 years, depending on the project's selection.</p> <p>However, this introduces arbitrariness into deeming whether the upstream GHG impacts are material (ie which period is selected)? And if assessed at the methodology level, the project crediting period is unknown.</p> <p>It could be instructive to draw upon financial analysis considerations here. In most interest rate environments, the value of a discounted cash flow becomes inconsequential after 10 years. A 10 year period is common to both project crediting period choices – if the 7 year crediting period is renewed.</p> <p>So 10 years seems a more reasonable time period over which to consider de minimis salience.</p>
572	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Yes
573	ANONYMOUS #12	N/A	N/A	Yes
574	ANONYMOUS #13	N/A	N/A	Yes, in instances where the project is replacing/displacing the baseline alternative (e.g., greenfield wind farm replacing/displacing a greenfield coal plant). Where the greenfield facility is not replacing/displacing the alternative, (e.g., greenfield industrial production) it would make sense to include those upstream emissions.
575	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	If emissions are "de minimis" it should not be accounted for.
576	STX Group	STX Group	Spain	It is suggested to deduct the credits from the entire crediting period evenly, the project could be unsustainable if a large portion of credits are deducted in the first seven years.

577	Márcia Silva	Ibá	Brazil	Yes, as per the caveats made above, but the comparison period must be at least until the second crediting period, so that there are fair bases of analysis. If upstream emissions are considered within the scope of credit generation, it is extremely important to create a tool that details the criteria for a certain emission to be considered de minimis.
578	Diego Toledo	re.green	Brazil	The 5% threshold for the minimis emissions is okay, but the period should be extended to the length of the crediting period. Some land-use projects may have emissions related to the project implementation only in the initial years of the activity and during the harvesting years (ARR, for example). These emissions should be very small when compared to the total GHG removals considering the entire crediting period.
579	Carbonext	Carbonext	Brazil	Emissions from before the project start should always be excluded at least for AFOLU (REDD+, ARR) projects.
580	Bibiana Duarte	Systemica Net Zero	Brasil	Whether it would be important to standardize a period for evaluating the significance of the emissions independent of the crediting periods
581	ANONYMOUS #22	N/A	N/A	How would "de minimis" be supported by evidence in this scenario?
582	Carla Zorzanelli	NBS Brazil Alliance	Brasil	If emissions are "de minimis" they should not be accounted for. The 5% threshold for the minimis emissions is okay, but the period should be extended to the length of the crediting period. Some land-use projects may have emissions related to the project implementation only in the initial years of the activity and during the harvesting years (ARR, for example). These emissions should be very small when compared to the total GHG removals considering the entire crediting period.
583	Julie Kelleher	3Degrees Group, Inc.	USA	Verra should assess the emissions as de minimis against the baseline construction emissions instead of comparing to the emissions reductions from the project activity.
584	Zimmfor	Zimmfor Management Services Ltd.	Canada	This seems logical, however, can the source behind the seven-year determination be provided? Is this based on methodologies already in use in other standards?
585	ANONYMOUS #23	N/A	N/A	We agree with the proposed approach.
586	ANONYMOUS #24	N/A	USA	Yes.

#### 4. Is it appropriate to account for these emissions in the first verification period, and divide them evenly across vintages within such a period?

Comment #	Name	Organization	Country	Comment
587	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
588	Eric Wilburn	NatureBridge	USA	Yes
589	ANONYMOUS #3	N/A	N/A	In general, a project should first compensate its own emissions, before being allowed to issue credits. That would ensure, a high quality carbon credit. As a compromise, the suggested distribution over the first verification period seems to be acceptable to allow early revenues for the project.
590	ANONYMOUS #5	N/A	N/A	I think that may be too short and though I'm not an accountant, I assume some principles of depreciation might be useful here.
591	ANONYMOUS #6	N/A	N/A	Yes, emissions should be distributed over time.
592	ANONYMOUS #7	N/A	N/A	Yes
593	Amélie Gelbmann	ecosecurities	Switzerland	<p>These emissions should be estimated conservatively rather than monitored, as the level of certainty surrounding them is low. Requiring an exact match as expected for monitored data during the first verification would be impractical. It would impose unnecessary difficulties on project developers, considering the challenges of accurately assessing such emissions.</p> <p>Regarding their accounting, these emissions should only be calculated ex-ante (before implementation) and could be distributed evenly across the crediting period or accounted for entirely in the first year. However, providing flexibility in these options for project proponents is crucial as it can significantly impact the financial analysis and overall viability of the project. Allowing such flexibility enables project developers to make informed decisions and ensures a more efficient and feasible implementation process.</p>
594	Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	At first blush yes. But if the upstream impacts are very significant and VCS is allowing crediting period renewals, such a limited time for amortization could result in very few initial credits during this period. So again, conduct some analyses first so you know the likely impacts of what you're requiring before you act!
595	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Yes, seems OK
596	ANONYMOUS #12	N/A	N/A	Yes
597	ANONYMOUS #13	N/A	N/A	Shell would support this, however importance should be placed on capturing emissions in quantification and allow projects to subtract them as they see fit. Projects with longer verification periods (AFOLU) would have more vintages to subtract from. This would allow flexibility for developers and take into account uniqueness in financing structures.
598	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	If it is insignificant (<5%), no. It should be split over the crediting period to prevent the project from becoming unfeasible.
599	STX Group	STX Group	Spain	It is appropriate to account for the upstream emission during the first verification. But as mentioned in question 3, the credits should be deducted evenly from the entire crediting period.
600	Diego Toledo	re.green	Brazil	If the project surpasses the 5% threshold for the minimis, the emissions should be quantified and accounted for in the year of occurrence.

601 Carbonext	Carbonext	Brazil	Emissions from before the project start should always be excluded at least for AFOLU (REDD+, ARR) projects.
602 Jacob Penner	The Nature Conservancy	United States	It depends on the activity. Where data is available that enables annual reporting, annual reporting should be preferred. However, some ALM projects that verify on the basis of soil measurements taken every ~5 years may already divide credits evenly among years and so it would make sense to treat upstream emissions similarly.
603 ANONYMOUS #20	N/A	N/A	No response
604 Bibiana Duarte	Systemica Net Zero	Brasil	It is a good option to divide the emissions in the verification period if it will generally give a negative balance by accumulating these emissions only in the first year of starting the monitoring.
605 ANONYMOUS #22	N/A	N/A	No response to this prompt.
606 Carla Zorzaneli	NBS Brazil Alliance	Brasil	If they are insignificant (<5%), no. It should be split over the crediting period to prevent the project from becoming unfeasible. If the project surpasses the 5% threshold for the minimis, the emissions should be quantified and accounted for in the year of occurrence.
607 Julie Kelleher	3Degrees Group, Inc.	USA	No, Verra should instead divide the project emissions along the equipment lifetime or cap the emissions at a % per reporting period or verification period. Accounting for all construction and upstream emissions during the first verification period places undue financial stress on new projects with long-lived equipment or high construction emissions. Dividing the project emissions across the equipment's lifetime would be a more accurate way to account for the full period over which the equipment will be used, including end-of-life usage after the crediting period. It would also alleviate stress on highly additional, new projects in need of short-term revenue from the sale of carbon credits.
608 Zimmfor	Zimmfor Management Services Ltd.	Canada	If the de minimis comparison to ERRs is done over the first 7 years of the project activity, would it not make more sense to allow the project to disperse the embodied carbon emissions throughout this same seven-year period that they are being compared to? The logic being the embodied carbon emissions are significant enough to affect the first 7 years of project crediting, therefore the first 7 years of the project are the most critical and therefore the embodied carbon emissions should be "paid off" within this same timeframe. Additionally, the requirement to evenly divide the emissions through every year may result in negative crediting years and create the need to initiate the loss event reporting process (creating more administrative burden on Verra). The proponent should have the opportunity to disperse the credits in a way that allows for the most positive crediting years possible.
609 ANONYMOUS #23	N/A	N/A	If it is possible to do the accounting for these emissions in a simple and easy way, then we should do that and divide them evenly across vintages.
610 ANONYMOUS #24	N/A	USA	It's possible that for some projects, these upstream emissions are significant and thus better divided over multiple verification periods. This does not mean they should necessarily be disincentivized, so we would suggest a more flexible approach.

#### 5. Are any types of projects at risk of having a negative assertion (becoming a net emitter) given this proposed rule, and if so, what guidance might alleviate this?

Comment #	Name	Organization	Country	Comment
611	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
612	Eric Wilburn	NatureBridge	USA	Possibly tech enabled removals
613	ANONYMOUS #5	N/A	N/A	If I understand the question, yes I think highly capitalized projects with short monitoring periods may be infeasible so per above comments suggest a depreciation approach to spread the "cost" of the pre-project emissions over a longer life of the project makes more sense.
614	ANONYMOUS #6	N/A	N/A	Project types where something is constructed where otherwise there would be no need for such construction (e.g., construction of an anaerobic digester where otherwise the farm could have continued use of an open lagoon) are probably the highest risk. The guidance should also consider whether the project equipment would have been constructed anyway, at a later date, but the project activity generated emission reductions that would not have occurred at that time (e.g., installation of a LFG control system).
615	ANONYMOUS #7	N/A	N/A	This is not our sector of expertise, but if any project types are net emitters then they should not be producing credits, as the credits do not represent a valid emissions reduction (with the exception of proof of concepts, etc).
616	Amélie Gelbmann	ecosecurities	Switzerland	Yes, small projects and community projects are at risk of having this negative assertion thus it is proposed that they are excluded from this rule to include upstream and construction emission. Otherwise, many small projects or community projects will not be able to implement themselves, and carbon project will only be implemented by big corporation and cannot touch the common community.
617	Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	This is an important question – and if VCS were to conduct reasonable diligence across multiple sectors itself it would be able to answer this question. See response to Q1.
618	Indradeep Das	ReNew	India	Answered in qs 1
619	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Not that we can think of
620	STX Group	STX Group	Spain	There will be more opportunities for projects in the energy industry, building facilities, and so on to become net emitters. It is required to evaluate these types of projects and see when they become net-positive projects (i.e., through a life cycle assessment). It is recommended to examine the feasibility of extending the crediting periods to avoid such projects becoming net emitters.

621	Márcia Silva	Ibá	Brazil	Upstream emissions should only be accounted for in two situations (i) where it is clearly possible to attribute the construction of a plant (upstream) to a project and (ii) if the use of the respective product in the project is recurrent (annual) and occurs in high proportions compared to the climate benefit generated by the project. If this type of situation occurs, it should also be allowed to compute any upstream emission reduction gains over time.
622	Diego Toledo	re.green	Brazil	Depending on the criteria adopted, projects may become unfeasible.
623	Carbonext	Carbonext	Brazil	Not that we are aware. This may be relevant in some types of carbon credit projects, but in relation to our specialty (REDD+ and ARR) this perspective does not apply.  Again, this proposal should be fully revised or not considered at all.
624	ANONYMOUS #20	N/A	N/A	No response
625	Bibiana Duarte	Systemica Net Zero	Brasil	Specifications will probably have to be made by types of projects
626	ANONYMOUS #22	N/A	N/A	No response to this prompt.
627	Carla Zorzanelli	NBS Brazil Alliance	Brasil	Depending on the criteria adopted, projects may become unfeasible. This may be relevant in some types of carbon credit projects, but in relation to our specialty (REDD+ and ARR) this perspective does not apply. Again, this proposal should be fully revised or not considered at all.
628	Julie Kelleher	3Degrees Group, Inc.	USA	For nascent or industrial project types - biochar, CO2 sequestration in concrete, direct air capture, cover gas replacement - the construction emissions may effectively cancel out the emission reductions if reduced to the timeline of a 7-year crediting period. Construction emissions for greenfield / new projects should be applied against the lifetime of the equipment and against the comparable emissions for the business-as-usual scenario that the project scenario is replacing.
629	ANONYMOUS #24	N/A	USA	This is outside our area of direct expertise, but as in the above comment, we would support a flexible approach to ensure that projects which may have a very significant, but backloaded, removals benefit are still able to access the finance they need to operate.

**6. Should increases in upstream emissions during project activities be considered? What conditions might be relevant when considering whether to include or exclude these emissions?**

Comment #	Name	Organization	Country	Comment
630	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
631	Eric Wilburn	NatureBridge	USA	Yes, energy sources for direct air capture.
632	ANONYMOUS #6	N/A	N/A	This can be addressed at a sector level, depending on the project activity. It is reasonable to exclude these emissions when the decisions that drive changes are unrelated to the project activity or decisions about project management (e.g., if a farmer increases fertilizer application)
633	ANONYMOUS #7	N/A	N/A	Yes
634	Amélie Gelbmann	ecosecurities	Switzerland	What kind of upstream emissions that needs to be considered? Is it the fabrication and construction? This should be very low and can be neglected if the project happens at the same time. If a project is done in stages then the upstream emission should also be accounted by its stages. Also, upstream emissions should be estimated and rounded.
635	Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	For the transport and energy methodologies I've written, I can't think of instances where upstream impacts arise from embedded carbon during project activities due to materials consumption beyond energy/fuels (because projects are largely consuming/reducing fuels/energy not other materials where the principle embedded impacts arise).  Emission factors for fuels and electricity can and do include upstream emissions. But generally, consistency with the most credible nationally published data is more important (ie consistency with e-grid EFkw factors, EIA fuel emission factors). These are data sources which most transport/energy methodologies specify as the most credible sources.  Electricity emission factor obviously do include upstream energy – where the electricity is generated. So there are examples of upstream emissions during project activities. Some fuel emissions data do and other don't include upstream impacts.  But the relative benefit of using credible national data for such emission factors outweighs using less credible sources in order to include upstream emissions if a methodology's national sources do not. Put another way, if the government published emission factors don't include upstream impacts, they are very likely de minimis – and so why would VCS deviate from such credible government publication sources by requiring an upstream set of impacts be included?
636	Indradeep Das	ReNew	India	It can be included, however, the percentage may vary across project types.
637	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Grouped projects may have an increase in activity and hence in upstream/construction emissions down the line. So, they would go up (as would the project carbon removals). When evaluating upstream emissions, it would be good to compare this on a per hectare basis to determine the materiality.
638	ANONYMOUS #12	N/A	N/A	Yes it should be considered, AFOLU projects have to consider leakage
639	Inigo Wyburd	Carbon Market Watch	Belgium	- Yes, upstream emissions during project activities should always be considered.

640 ANONYMOUS #13	N/A	N/A	Shell would support the quantification of upstream emissions where it is demonstrated that those emissions are greater than in the baseline scenario. In addition, such emissions would have to be greater than the de minimis threshold.
641 Caio Gallego	Biofíllica Ambipar Environmental Investments	Brazil	If they are directly related to project activities and not insignificant (>5%), they should be considered.
642 STX Group	STX Group	Spain	More clarification is required on 'increases in upstream emissions'. Each methodology should clearly mention which upstream emissions should be monitored and reported in the monitoring report. However, the credits deduction should be based on significance level of the increment of the upstream emissions, and this should be clear on the standard/methodology or tool.
643 Márcia Silva	Ibá	Brazil	As answer Above
644 Diego Toledo	re.green	Brazil	The increase in upstream emissions should be considered if they surpass a specific threshold. The Scope 3 categories to be considered should be specified by the VCS-Verra, and we understand that upstream emissions should have a limit in the supply chain of the project activity. For example, they should include only the first phase near the project and not the cradle to grave emissions of all inputs.
645 Carbonext	Carbonext	Brazil	This is not the case for AFOLU (at least REDD+) projects our main area of expertise. Although, if upstream emissions increases, they should be intrinsically included in project calculations, yes.
646 Jacob Penner	The Nature Conservancy	United States	<ul style="list-style-type: none"> <li>•The added complexity of accounting for new GHG emissions/sources and its impact on the costs of project development and monitoring versus what may be a very small change in VCUs.</li> <li>•Is an increase in emissions that occurs prior to a project's start date or outside of a project's geographic footprint better accounted for as emissions due to leakage? Can construction and upstream emissions be accounted for as leakage without adding these sources to a Project GHG Boundary?</li> </ul>
647 ANONYMOUS #20	N/A	N/A	No response
648 Bibiana Duarte	Systemica Net Zero	Brasil	With the significance of the increases in emissions
649 ANONYMOUS #22	N/A	N/A	No response to this prompt.
650 Carla Zorzaneli	NBS Brazil Alliance	Brasil	If they are directly related to project activities and not insignificant (>5%), they should be considered. The increase in upstream emissions should be considered if they surpass a specific threshold. The Scope 3 categories to be considered should be specified by the VCS-Verra, and we understand that upstream emissions should have a limit in the supply chain of the project activity. For example, they should include only the first phase near the project and not the cradle to grave emissions of all inputs.
651 Zimmfor	Zimmfor Management Services Ltd.	Canada	These types of emissions are already accounted for within AFOLU projects in the form of activity shifting and market leakage. This same approach should be applied to other project activities.
652 ANONYMOUS #23	N/A	N/A	<p>The following emissions should be considered:</p> <ul style="list-style-type: none"> <li>- fabrication or production of project inputs (embodied carbon), and</li> <li>- construction emissions</li> <li>- transportation emissions of project inputs</li> </ul>
653 ANONYMOUS #24	N/A	USA	Yes; changes in upstream emissions are relevant to the overall climate benefit of the project and should be accounted for.

**7. Is the current 5% de minimis threshold for AFOLU appropriate for assessing whether upstream and construction emissions should be accounted for across all project types?**

Comment #	Name	Organization	Country	Comment
654	Lasse Leipola	Finnwatch	Finland	There should not be a de minimis threshold at all. All emissions from the construction and upstream activities should be taken into account when crediting.
655	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
656	Eric Wilburn	NatureBridge	USA	Yes
657	ANONYMOUS #6	N/A	N/A	Yes.
658	ANONYMOUS #7	N/A	N/A	Yes, the current process is appropriate, and a margin for error associated with modelling emissions from changes in land use or from degraded land could be included.
659	Amélie Gelbmann	ecosecurities	Switzerland	Threshold should be determined by project type/methodology to ensure that they are properly accounted.
660	Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	<p>There are many places where VCS relies upon 5% as a de minimis threshold. Other certification agencies recognize that de minimis thresholds can be applied with more tailoring to market contexts. For example, VCS assumes that 5% is the appropriate market share penetration level upon which it can assume that activity method's additionality thresholds must always be based. Other certifiers take a more nuanced, contextualized view and set the percentage level reflecting how they see maturity for the market concerned.</p> <p>Generally, VCS would benefit from applying de minimis thresholds with more tailoring to context, program wide.</p>
661	Indradeep Das	ReNew	India	As regarding uniform 5% threshold for assessing upstream/construction emission, we would like to state that it can be objectively looked upon basis project type. As a matter of fact, Small and marginal farmers and rural community are worst affected by climate change adversities. Hence we believe if an uniform 5% threshold is applied uniformly across all AFOLU projects, it may erode capability to develop small scale projects for carbon finance. Hence we suggest AFOLU project type wise threshold for project emission computation.

662 Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	Yes, that seems OK
663 ANONYMOUS #12	N/A	N/A	Yes
664 ANONYMOUS #13	N/A	N/A	As 5% has always been the threshold, Shell considers it appropriate to apply it across all project types.
665 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	Yes. Considering all project removals/reductions throughout the crediting period.
666 STX Group	STX Group	Spain	The de minimis threshold level should be applicable for some project types such as Industrial, building, and community-based projects (e.g. cookstove).
667 Lynn Riley	American Forest Foundation	United States	5% is an appropriate and reasonable threshold.
668 Diego Toledo	re.green	Brazil	For the upstream emissions, we consider a 10% threshold more appropriate. Additionally, the VCS-Verra should determine the Scope 3 categories to be included in the analysis.
669 Carbonext	Carbonext	Brazil	It seems a good threshold. However, this has not been applicable to the REDD+, our main expertise, to better feedback.
670 ANONYMOUS #20	N/A	N/A	No response
671 Bibiana Duarte	Systemica Net Zero	Brasil	5 percent of total reductions or removals is appropriate.
672 ANONYMOUS #22	N/A	N/A	No response to this prompt.
673 Carla Zorzanelli	NBS Brazil Alliance	Brasil	Yes. Considering all project removals/reductions throughout the crediting period. For the upstream emissions, we consider a 10% threshold more appropriate. Additionally, the VCS-Verra should determine the Scope 3 categories to be included in the analysis.
674 Zimmfor	Zimmfor Management Services Ltd.	Canada	Cannot comment on this statement due to not having the source information for how 5% was determined as the AFOLU threshold. The approach to determining 5% for AFOLU projects could very well be non-transferrable to other project types. Recommend utilizing statistical analyses to determine appropriate thresholds.
675 ANONYMOUS #23	N/A	N/A	We think that project developers should still report those upstream and construction emissions and Verra should suggest to the project developers whether to include or exclude those emissions on a case-by-case basis.
676 ANONYMOUS #24	N/A	USA	The same de minimis threshold should apply across all project types.

**8. Do you have any other comments on this proposal?**

Comment #	Name	Organization	Country	Comment
677	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
678	Eric Wilburn	NatureBridge	USA	No
679	ANONYMOUS #3	N/A	N/A	Embodied emissions need to be included to ensure high quality credits
680	ANONYMOUS #7	N/A	N/A	No
681	Amélie Gelbmann	ecosecurities	Switzerland	Yes, see below: <ul style="list-style-type: none"> <li>- These emissions should be estimated conservatively, rounded up, during Project registration phase, and reassessed during renewals</li> <li>- We should not expect to have the same level of scrutiny and assuranacy in these emissions and monitored data. This should not be monitored with the same level of scrutiny, to the decimals.</li> <li>- The criteria for including or excluding upstream emissions should be carefully designed to avoid excluding small and community projects, ensuring their participation and viability within the rule framework.</li> </ul>
682	ANONYMOUS #11	N/A	N/A	The answer here is not directly related to upstream emissions, but our opinion overall is that the new requirements and some of the new methodologies are more large farm centric and not suitable for project developers who primarily work with small holder farmers.

683 ANONYMOUS #13	N/A	N/A	<p>1. Shell sees a need for the adaptive management plan sections and content to be described in greater detail in Verra's documents.</p> <p>Ideally an adaptive management plan should show what the most likely scenarios are to be adapted to, including but not restricted to climatic scenarios; a significant expected increase in population; an expected change in the physical characteristics of the landscape due to infrastructure development, etc.</p> <p>2. Clarity is needed on whether land management plans are required to be officially approved by the competent local authority. If so, Shell would recommend updating NPR tool language to reflect this by saying "approved management plan"</p> <p>3. Shell is concerned the language in the NPR tool is too vague in this example: "Is the project in country/jurisdiction with a history of national, sub-national, or local government ("Government") intervention in land or resource use?".</p> <p>It is recommended that Verra determine how many years are sufficient for a historical look-back to effectively assess if a country has a history of land intervention. Similarly, it would be useful to know which activities are included in this determination, i.e., is Verra considering Government interventions in all sectors (e.g., mining, agriculture) or only in the NBS space?</p> <p>4. Section which states "Government has previously changed land rights in the project's jurisdiction (e.g., cancelled, or blocked land titles, expropriated land or issued overlapping land titles)":</p> <p>Under some circumstances, States could take over land management when it has been demonstrated through a juridical process that the previous landowner has mismanaged land or has occupied it irregularly. These cases should be excluded from the scope included in the non-permanence tool.</p> <p>5. Clarity on the difference between project crediting period and project longevity is needed in the VCS Standard.</p> <p>6. Shell recommends adding additional explanations to each question in consultation documents. (For example, as with CDM Information Notes).</p> <p>7. Shell recommends clarifying how all new requirements are applied to existing projects and those under development (not only those pipeline listed as under development).</p>
684 Caio Gallego	Biofílica Ambipar Environmental Investments	Brazil	It is important to consider the obligations of other sectors (civil construction, production, etc.) to offset their emissions as a way of not needing to be accounted for in the project.
685 Lynn Riley	American Forest Foundation	United States	We appreciate Verra's move toward a full systems approach to accounting for sinks, sources, and reservoirs. We suggest that this also apply to a full systems approach to carbon pools, such that if a project activity is relevant to a carbon pool, that carbon pool should be included in accounting. For example, ARR methodologies that could increase harvested wood products should have a mechanism for harvested wood products as an accounted for pool (whether within the methodology, or a tool or module), to be consistent with this full systems, complete accounting approach.
686 Diego Toledo	re.green	Brazil	The upstream emissions should be evaluated for both the baseline and project scenarios
687 ANONYMOUS #19	N/A	N/A	More guidance on LTA should be provided. For reforestation grouped projects with harvest this is having a serious impact and allowed issuances are greatly reduced. There is limited guideline on how to include new project instances or time periods for this and how project instances can be monitored individually when they are not owned by the same owner.
688 Carla Zorzanelli	NBS Brazil Alliance	Brasil	It is important to consider the obligations of other sectors (civil construction, production, etc.) to offset their emissions as a way of not needing to be accounted for in the project. The upstream emissions should be evaluated for both the baseline and project scenarios.
689 ANONYMOUS #23	N/A	N/A	Verra should conduct an evaluation of carbon capture and storage (CCS) projects to determine whether to incorporate upstream and construction emissions.

## Updates to the process for revising standardized methods that use the activity penetration approach

1. What are the risks of reactivating a methodology that originally relied on activity penetration to demonstrate additionality and has since seen the activity penetration increase beyond 5%?				
Comment #	Name	Organization	Country	Comment
690	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
691	Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	<p>Firstly it is a good idea to revise the Standard so that methodologies can be revised and/or other additionality tools applied so that crediting can continue, provided additionality is demonstrated using another of VCS' permitted approaches.</p> <p>Notice please that VM0038 already has written into it permission to use project testing additionality test so that when a region exceeds 5% threshold (ie number of EVs on the road in a given region is over 5% of the total cars on the road), the project testing additionality test can be used.</p> <p>This was included and approved by VCS for this meth because it recognized that there can be subsegments (e.g. installing chargers in multifamily housing) which lag behind other segments of the market. Thus, when a state or region first exceeds the 5% threshold, there can still be valid segments of the EV charging market where the additionality of their installation is still valid (when assessed using market barrier/financial approaches).</p> <p>So the revision of the Standard preventing the continued application of a methodology when a 5% threshold is reach is wise – and was already recognized as important when VM0038 was approved.</p> <p>Secondly, please recognize that methodologies like VM0038 do not have a SINGULAR 5% threshold applicable to all regions. Typically activity methods should have such 5% threshold analyzed across each market – just as VM0038 analyzes the 5% threshold for every major country when publishing its positive list in VMD0049.</p> <p>VCS' current revisions to the standard proposes rendering a methodology inactive when the 5% threshold is breached. As written, it appears to intend that the entire methodology would become inactive. This is a problem when a sophisticated methodology like VM0038 analyzes multiple regions to determine which ones do and don't exceed the threshold. VM0038 analyzes this 5% threshold over many different levels of geography including a) country b) province/state c) subregion (economic region within a state/province). It explicitly allows for a smaller region (b or c) to still be determined to be below the 5% threshold when the larger region (a or b respectively) is found to be over 5%. Thus the methodology allows projects to distinguish the smaller regions in which the activity penetration test is still valid. This approach enables EV charger crediting to continue in locations which lag behind a wider market trend, getting vital VCM capital to the places where it continues to be most needed and well justified.</p> <p>As a result, VCS' new Standard revisions should not be framed as currently proposed: a methodology should NOT BE DEEMED INACTIVE in its ENTIRETY when ONE region of a methodology exceeds its 5% level. This fails to appreciate the sophisticated ways in which the 5% test is currently applied – and the core expectations of such a test, which is that it should be applied to markets in a sensibly segmented fashion to be accurate.</p> <p>Instead, IF there is to be any inactivity applied to a methodology, it should be done relative to the particular regions where 5% is breached. However, there is a far better approach we believe that is already approved under VM0038 which should be examined to see whether it provides a better pathway for VCS to achieve its goals here (see 3,4 5 below)</p> <p>Third, there is a much better way to apply such screens to a methodology that has multiple regions against which the 5% test is applied – rather than deeming a portion of it "inactive". VM0038 has a negative list published – namely a set of regions where the threshold has been breached. In these regions, VCU issuance is not permitted (the VMD0049 which contains the positive and negative lists serves as an applicability condition which must be met for VM0038). Thus the VMD activity test module itself is the vehicle through which the issuance of VCUs is prohibited. There is no need to deem the whole or some part of the methodology "inactive", which is a much cruder method. A negative list in the VMD module achieves this result on a much more nuanced, finer grained basis.</p> <p>Fourth, this alternative approach is also preferable because it would be sensible for 5% activity penetration methodologies to establish, as VM0038 did, the form in which additionality testing would be conducted once the 5% threshold has been breached in a given region. This would avoid needing to rewrite a methodology which had been deemed inactive by VCS (as proposed). Rather, as the methodology is first developed, the "next stage" additionality testing would be considered upfront and written in from the beginning.</p> <p>Methodology development – and updates/extensions – are very time consuming and expensive to conduct. So there is considerable efficiency gained by working into a 5% penetration methodology this "next stage" additionality testing as the methodology is first written and approved.</p> <p>Lastly, there are good reasons to allow for performance curve additionality tests to be applied once the 5% market share has been breached. We prepared such performance curve additionality tests when first writing VM0038 – specifying that they would only be eligible to be applied once the 5% market threshold had been breached. So VCS should expand its language to allow activity penetration methodologies to include these other kinds of standardized additionality tests to be applied "post 5%".</p>
692	Indradeep Das	ReNew	India	<p>The primary purpose of activity penetration based demonstration of additionality is to promote a set of decarbonization projects which otherwise would not be able to scale and achieve the emission reduction targets within stipulated time. This is primarily due to unforeseen project risk, high capex, and limited global experience on project implementation. Now if with 5% activity penetration target, the desired emission reduction outcome has been reached, then reactivating the same methodology may lead to erosion of confidence in such projects. However, if even after crossing 5% activity penetration, the desired level of emission reduction has not been reached, then reactivating the methodology would contribute to the required emission reduction. In such a case, as aptly put by VERRA, any restriction may create a barrier to climate action. Hence, the activity penetration target should be evaluated on project to project basis, along with climate objective review with such project type.</p>
693	Thurstan Wright (Senior Carbon Expert, SilviCarbon); Jan-Willem Martens (Co-Founder / Director, SilviCarbon); Belinda Kinkead (Director of Carbon, SilviCarbon)	SilviCarbon	The Netherlands	No comment
694	ANONYMOUS #12	N/A	N/A	Considering the need for climate action we need as many approaches as possible, arbitrary 5% thresholds can be revised
695	ANONYMOUS #13	N/A	N/A	Shell sees this as potentially providing a perverse incentive to take a different approach to demonstrating additionality for project types that have exceeded that threshold. This could put different additionality tests at odds with one another and confuse the market.
696	Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	No feedbacks

697 STX Group	STX Group	Spain	<p>There may be arisen two different main risks regarding that:</p> <ul style="list-style-type: none"> <li>- Misleading perceptions among stakeholders: If a methodology initially relied on activity penetration to demonstrate additionality but has seen an increase in the penetration rate, it can create misleading perceptions among stakeholders.</li> <li>- Corporate reputation risk: Reactivating a methodology while disregarding the past increase in activity penetration can pose risks to the corporate reputation of the project proponent and relevant stakeholders. The emergence of a misleading situation in the project can have serious implications for credibility and sustainability.</li> </ul> <p>For this reason, in case of an increase in the activity penetration beyond 5%, the project should be subjected to a process like "Design change". During this process, chosen different additionality approach of the project should be assessed again and relevant stakeholders' consent should be obtained by reorganizing a new stakeholder meeting for the project activity.</p>
698 Diego Toledo	re.green	Brazil	Depending on the methodology, there is a risk of reactivating projects beyond 5% of activity penetration. However, this analysis should be carried out on a case-by-case basis to avoid penalizing projects that use this approach
699 Carbonext	Carbonext	Brazil	Activity penetration we believe is not applicable to REDD+ projects in general, so no further inputs will be provided.
700 ANONYMOUS #20	N/A	N/A	No response
701 Bibiana Duarte	Systemica Net Zero	Brasil	It would represent an instability in the use of a methodology. Standardized methods should be conditional and only determine additionality from the start.
702 ANONYMOUS #22	N/A	N/A	No response to this prompt.
703 Carla Zorzanelli	NBS Brazil Alliance	Brasil	Depending on the methodology, there is a risk of reactivating projects beyond 5% of activity penetration. However, this analysis should be carried out on a case-by-case basis to avoid penalizing projects that use this approach.
704 Julie Kelleher	3Degrees Group, Inc.	USA	<p>3Degrees is in support of this update to the Verra Standard. As the newly revised methodology would have to define an additionality approach, we do not see a risk for projects that could still provide another type of additionality. Five percent activity penetration for nascent technologies or activities is still very low, and removing carbon market incentives prematurely would lead to a downturn in project development due to increased financial risk in the short term.</p> <p>However, 3Degrees sees a potential risk for projects nearing re-validation when their methodology is canceled. Without a timeline for reactivation or information on a grace period while the methodology was inactivated, the project would be unable to undergo re-validation and would be subject to the 2-year re-validation window. 3Degrees recommends that Verra creates an exception to the 2-year re-validation window for projects with temporarily inactive methodologies that can demonstrate sufficient proof of additionality upon re-activation of the protocol.</p>
705 ANONYMOUS #23	N/A	N/A	<p>The risks would rely on the process for reactivation of the methodology. There are several items to consider here before assessing the risks:</p> <ul style="list-style-type: none"> <li>-Project methods (regulatory surplus, implementation barriers, common practice) and activity methods (regulatory surplus, positive list [activity penetration, financial feasibility, revenue streams]) require similar tests – so why not update the activity penetration beyond 5% (CDM tool for additionality, 20%)</li> <li>-The repercussions for modules under methodologies that use the activity methods. VCS requirements say that modules cannot be adapted within methodologies if the module uses performance benchmarks to prove additionality (unless the original meth used PB), would this impact adapting methodologies?</li> <li>-There are risks associated with the timelines of a methodology redevelopment. If the idea of reactivation is as lengthy as a methodology revision this poses a risk for project developers' interest in certain technologies as well as the data requirements needed under a reactivated methodology.</li> <li>-Activity penetration rates may exceed 5% in one jurisdiction but be lower than 5% in another jurisdiction. How will Verra decide when to deactivate the methodology?</li> </ul> <p>In conclusion, it depends on the approach Verra decides to take. With the current VCS standard, it seems that the process can be complicated and inefficient for methodology developers to change the additionality approach since the other additionality types require similar tests. Further, we need to understand how this interacts with the Longevity Period for PDs to do MRV and replacement from the buffer pool. It is not clear.</p>
706 ANONYMOUS #24	N/A	USA	Outside our area of expertise.

## 2. Are there other project types that rely on activity penetration that might benefit or suffer from this proposed change? How?

Comment #	Name	Organization	Country	Comment
707	Livio Pierro	Face the Future	Netherlands	Not my expertise area.
708	Josiah McClellan	Land O'Lakes	United States	The proposed change to activity penetration is beneficial. For ALM projects where there are significant up-front costs to improved practices, and activity penetration is used as the expedient option in methodology development, the proposed change creates more equity for participants. For example, as highly capitalized land managers adopt the improved activities, the activity penetration passes the threshold and this creates inequity where lesser capitalized land managers are unable to access the benefits of the program without revising the additionality approach. Creating a pathway to revise the additionality approach will lead to greater access for smallholders and under-served communities.

709 Sue Hall	Climate Neutral Business Network & Connecticut Green Bank and Partners	USA	<p>See above response to #1.</p> <p>There is very significant suffering that would arise from the Standard revisions as currently proposed: your approach would close down VM0038 as soon as one region exceeded the 5% threshold. This has absurd implications: VM0038 version 1.0 when first published already had one region -- Norway -- which was on the negative list since its penetration exceeded 5%. So as written, your Standard revisions would have inactivated VM0038 at the very point where it was approved. As written, your revisions to the Standard would close down all VCU on VM0038 immediately. This, I'm sure is an unintended consequence!</p> <p>Far finer levels of granularity are therefore needed in VCS' approach here. We would be glad to work with you using VM0038, which has very sophisticated applications of the 5% test, to see how VCS' laudable goals could best be reached and changes to the Standard codified.</p> <p>The broader benefits of VCS' goals are vital to pursue: your intent is to enable crediting to continue to be permitted where additionality can continue to be demonstrated using other additionality tests which the VCS Standard permits. VM0038 recognized the importance of this goal and was structured to achieve them in ways that draw on some of your proposals (e.g. another additionality test can be applied) -- but achieves this goal without all the "suffering" and adverse consequences which the current approach introduces.</p> <p>VCS should therefore pursue its goal here but scrutinize the approach it is proposing in much more detail in order to avoid a whole series of unintended consequences -- which would inactivate entire methodologies prematurely across whole regions where they would still be justified -- as a response to one particular region exceeding its 5% threshold! The approach developed with VM0038, with its negative lists and the inclusion from the first accreditation of a valid "post 5% additionality test" procedure, gives a very sound template for a more nuanced approach which achieves VCS goals and avoids the obvious pitfalls that its current approach introduces. We would be glad to work with VCS to help think through Standard revision language that reflects the successful structures we designed into VM0038 that other standardized methodologies could also usefully apply -- and be reflected in any proposed Standard revisions.</p>
710 Indradeep Das	ReNew	India	There might be several NBS, community projects, technology based projects (like biochar/CCUS), which have proof of concepts but yet to be implemented at significant scale so as to achieve the desired CO2 reduction/ removal outcome targets. An uniform 5% capping, and restructuring revisions may adversely affect long term viability of such projects.
711 ANONYMOUS #12	N/A	N/A	ALM and ARR can potentially be affected, again we need large scale change, so what if a mitigation activity has 80% penetration, that is what we need. If 80% of farmers adopt practices because they get additional income through carbon it should supported.
712 ANONYMOUS #13	N/A	N/A	Shell sees this as potentially restricting certain methodologies to a lifetime, whereas others would not be impacted by this change.
713 Caio Gallego	Biofilica Ambipar Environmental Investments	Brazil	No feedbacks
714 STX Group	STX Group	Spain	Besides renewables, project types that used activity penetration approach while being registered, such as solar water heating system, clean & energy efficient cookstoves, high efficiency biomass fired devices (e.g. energy efficient cookstoves) and solar lamps etc. might also benefit from this proposed change. Most of these projects are community-based projects, and many of them provide significant benefits to their beneficiaries, contributing to social and economic aspects in various ways. Projects that have previously registered using the activity penetration approach may choose to pursue capacity enhancement with this rule change. By doing so, they can demonstrate additional conditions and further prove the project's additionality, thereby enabling the project to serve more beneficiaries.
715 Diego Toledo	re.green	Brazil	This analysis should be carried out on a case-by-case basis.
716 Carbonext	Carbonext	Brazil	Activity penetration we believe is not applicable to REDD+ projects in general, so no further inputs will be provided.
717 ANONYMOUS #20	N/A	N/A	No response
718 Bibiana Duarte	Systemica Net Zero	Brasil	The projects developed would not have any impact if they were already evaluated with the applicability of the methodology during their validation.
719 ANONYMOUS #22	N/A	N/A	No response to this prompt.
720 Carla Zorzanelli	NBS Brazil Alliance	Brasil	This analysis should be carried out on a case-by-case basis
721 ANONYMOUS #23	N/A	N/A	More information on the inactivation/reactivation process is required. For example, suppose a project activity within a methodology exceeds the 5% activity penetration threshold, causing the methodology to be inactivated. What would happen to a preexisting module that expands upon the original project activities, and offers an alternative approach to addressing additionality (i.e., allowance for performance methods)?

## Other general comments

Comment # Name	Organization	Country	Comment
722 ANONYMOUS #8	N/A	N/A	<p>1. I think there is a mistake on the calculation of the NPRT Project Longevity (a and b), you get a higher number with the legal agreement.</p> <p>2. If a comment is sent outside the 30-day public comment period, should there be a limit of when the VVB can assess it? Already VVBs are overwhelmed with work and getting a comment at the end of the validation might slow things down. I think there should be a time period after which the VVB can assess or not.</p> <p>3. Although I am a big supporter of increasing the robustness of the safeguards, the requirements are too vague. It is already super costly to develop a project, so if all these safeguards will be required, please provide more guidance on how to demonstrate compliance with them.</p> <p>4. I am very happy to see a new requirement for transparency on the benefit sharing agreement. My comment is that it should be always required, even if the project does not impact property rights, usage or resources. One important consideration is how the benefit sharing is shared, will this be only with Verra and the VVB? I am asking because if this is made publicly available it might represent a safety risk for local communities. For example, if it is publicly shared that XX community is receiving XX amount of credits/cash, it could be a safety issue for those landowners.</p>
723 Mariana Barbosa	re.green	Brazil	<p><b>Comments in the document: "June-2023-VCS-Program-Update-Public-Consultation-Overview"</b></p> <p>For the requirements in Section 3.18.5 – 3.18.13, in order to ensure these safeguards are met, the project proponent shall assess the risk of any negative impacts on the environment, employees, and local residents and communities. Where the assessment identifies any such risks, the project proponent shall disclose the risks and indicate <b>the measures that the project will take demonstrate that the project has taken measures</b> to prevent or mitigate such impacts in the project documents. Any such impact and mitigation measures shall be reported in the applicable project document at initial validation and <b>their implementation shall be reported in</b> each verification.</p> <p>3.18.20 Where the project activity impacts <b>third-parties'</b> property rights, usage or resources, the project shall include a benefit-sharing arrangement appropriate to the local context and consistent with applicable national rules and regulations. Such arrangement shall be agreed upon by local communities and indigenous peoples, and the project proponent shall provide evidence of such agreement. The project proponent shall share the draft and final benefit sharing plan with the affected communities in a culturally appropriate manner and shall provide such evidence, along with the final benefit sharing arrangement with project documentation.</p> <p>Proposed text:</p> <p>3.19.2 The project proponent shall conduct a local stakeholder consultation <del>before</del> <b>or during initial phases of</b> implementation of project activities. Such consultations shall be done in a manner that is inclusive, culturally appropriate, and respectable of local knowledge.</p>
728 Sheldon Zakreski	BluEarth Carbon Development		<p>Closing Thoughts</p> <p>Thank you again for the opportunity to share my comments on the proposed updates to the VCS Standard and Non-Permanence Risk Tool. These updates have significant implications for the development of projects but are necessary to keep pace with evolving standards around project integrity. The proposed NPRT updates seemingly indicate that buffer contributions will increase. Considering these changes, introducing flexibility in the form of using third party project VCUs and/or purchasing insurance is worthy of serious consideration by Verra.</p>