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VERRA

GRIEVANCE REDRESS PROCESS

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1 PURPOSE

This Grievance Redress Process ("**Process**") sets out how Verra implements the timely, effective, impartial handling and resolution of Grievances submitted by stakeholders in relation to projects listed, registered, or which have requested registration and/or verification under a Verra Program.

2 DEFINITIONS

In this document:

"Complaint" has the meaning given in Section 4.1 of this document.

"Complainant" has the meaning given in Section 3.2 of this document.

"Eligibility Thresholds" has the meaning given in Section 6.1 of this document.

"Grievance" has the meaning set out in Section 4.

"Grievance Intake Form" is the mandatory form to be completed by the Complainant to file a Grievance.

"Project Grievance Redress Mechanism" refers to the formal mechanism established by the project proponent for receiving, assessing, and resolving project grievances raised by project stakeholders, ensuring that stakeholder concerns are addressed in a fair, timely, and transparent manner, including provisions against retaliation and to prevent harm to stakeholders.

"Project" means an initiative established by one or more project proponents to implement project activities that reduce GHG emissions or remove carbon dioxide and encompass all associated actions necessary for participation in a GHG program. This term includes jurisdictional REDD+ programs under the VCS Program or project initiative established under any other Verra Program listed on the Verra [website](#) from time to time.

"Project Proponent" or "PP" means the individual or organization that has overall control of, and responsibility and accountability for, a project, or an individual or organization that together with others, each of which is also a project proponent, has overall control of, and responsibility and accountability for a project. Such entities can demonstrate the right to operate and the right to reductions and removals.

"Public Comment" means a comment received pursuant to the RIP either as a comment received within the Public Comment Period or a comment received outside of the Public Comment Period.

"Reconsideration Request" means an objection to the decision made by Verra regarding a Complaint.

"Referred Grievances" has the meaning set out in Section 4.2 of this document.

"RIP" means the VCS Registration and Issuance Process, v5.0, as amended from time to time.

"Validation/Verification Body" or "VVB" means an organization approved by Verra to act as a validation/verification body in respect of providing validation and/or verification services in accordance with Verra Program Rules and Requirements.

"Verra Program" means the following programs and standards managed by Verra: (i) Verified Carbon Standard (VCS), Jurisdictional & Nested REDD+ (JNR) Framework, (iii) Scope 3 Standard (S3S), (iv) Climate, Community & Biodiversity Standards (CCB), (v) Sustainable Development Verified Impact Standard (SD VISTa) and, (vi) Plastic Waste Reduction Standard.

"Verra Program Rules and Requirements" means those rules and requirements adopted by Verra for the relevant Verra Program, Verra's formal guidance documents, and any additional direction provided by Verra as part of its implementation of the relevant Verra Program but excluding the Verra Registry Terms of Use.

"VVB Complaints/Appeals Process" means the ISO 17029/14065 requirement for VVBs to maintain mandatory, publicly available, and documented processes for receiving, evaluating, and resolving complaints, as well as for receiving, evaluating, and deciding appeals. These processes provide parties with an interest in validation and verification the opportunity to submit complaints and ensure that such complaints are appropriately managed and resolved.

Any other capitalized terms in this Process will have the meaning given in the VCS Program Definitions v5.0, as amended from time to time.

3 ROLES AND RESPONSIBILITIES

3.1 Verra

Verra is a non-profit organization incorporated under the laws of Washington, DC, USA. Verra administers several sustainability-related standards and operates the Verra Registry. In that capacity, Verra oversees and promotes the integrity of projects, programs, and units generated under its Programs (such as VCUs) in the Verra Registry. Verra also approves ISO 17029/14065 accredited VVBs to perform validation and verification services under its programs and specific sectoral scopes.

In performing its role as a standard setter and registry operator, Verra establishes this Process and will act within the scope set out in this document. Verra is not a formal adjudicatory body and will not intervene in, or resolve, third-party disputes.

3.2 Complainants

Grievances can be filed by any project stakeholder, including governments, local stakeholders, Indigenous People and Local Communities, Project Proponents, Authorized Representatives, and Registry Users ("**Complainants**"). Depending on the type of Grievance, Complainants may submit a Grievance anonymously (without disclosing their identity to Verra), or confidentially (requesting Verra not to disclose their identity to other stakeholders). However, they must provide a reason to support that anonymity or confidentiality, such as protection against retaliation.

Complainants who wish to have their identity remain anonymous or confidential are advised that doing so could restrict Verra's ability to process a Grievance. Verra reserves the right to determine whether anonymous or confidential Grievances can be processed in accordance with this Process.

4 CATEGORIES OF GRIEVANCES

In this Process, 'Grievance' means any concern submitted via the Grievance Intake Form. Grievances fall into two categories: (i) Complaints and (ii) Referred Grievances.

Verra retains sole discretion to determine whether a Grievance submitted falls within the scope of this Process and to require additional information from the Complainant to make that determination. Verra reserves the right to dismiss Grievances that are frivolous or vexatious.

4.1 Complaints

A Complaint is:

- (a) An objection to a decision made by Verra in relation to the implementation of its Program Rules and Requirements regarding Projects, such as the following: (i) Project listing and processes related to project registration and issuance of VCUs, and (ii) suspension or termination of a Verra approved VVB pursuant to the Program Rules and Requirements. This type of Complaint cannot be filed anonymously.

- (b) A concern about a potential non-conformance of a Project with Verra's Program's Rules and Requirements. This type of Complaint may only be submitted to Verra when the Project Grievance Redress Mechanism has failed to respond to or substantively address the matters raised by the Complainant, within 3 months from the initial submission or from the response given by the PP, respectively. The Project must be registered in the Verra Registry or have requested registration. This type of Complaint can be filed anonymously, or the Complainant may request their identity to remain confidential to other stakeholders.

Complaints are processed by Verra in accordance with Section 7.1 below.

4.2 Referred Grievances

Referred Grievances are Grievances about a potential non-conformance of a Project with Verra Program's Rules and Requirements that require action by another stakeholder, such as the PP or VVB, before Verra can take any direct action in accordance with Section 7.2 below.

5 OUTSIDE OF SCOPE

The following matters are outside of the scope of this Process:

- (a) Concerns related to the way in which governmental bodies apply a regulatory framework.
- (b) Disputes arising under contractual arrangements that are not related to the provisions of the Verra Program Rules and Requirements (e.g. a dispute in connection with the Verra Registry Terms of Use).
- (c) Disputes arising between the Complainant and a third party.
- (d) A Grievance already submitted by the same Complainant, unless the matter falls within the scope of Section 9 of this Process.
- (e) A matter related to a Grievance that has already been resolved within the past 12 months, whether submitted by the same or different Complainant, unless the matter falls within the scope of Section 9 of this Process.
- (f) Other concerns:

Category of concern	Description/example	Applicable Process and contact
General feedback or concern regarding Verra Program Rules and Requirements not relating to a specific project or decision	Feedback or comments regarding Verra Program Rules and Requirements.	Stakeholders are encouraged to submit feedback on Verra Program Rules and Requirements during the public consultation periods for relevant program rule updates as publicly notified from time to time. When a rule or requirement is no longer under public consultation, stakeholders are encouraged to email secretariat@verra.org to ensure their

		feedback is considered in future program updates.
Concern regarding Verra Service Level Agreements (SLAs)	Questions or concerns related to Verra's adherence to applicable Service Level Agreements (e.g. for project review duration).	Stakeholders should contact secretariat@verra.org
Concern regarding the application of Verra Fee Schedule	Questions or concerns regarding the application of Verra Fee Schedule.	Stakeholders should contact secretariat@verra.org
Concern regarding a Verra-approved VVB	Concerns about the conduct, competence, impartiality, validation or verification process, or statement of opinion issued by a Verra-approved VVB contracted by a project.	Stakeholders shall submit their concern directly to the VVB's complaints or appeals process and, where applicable, through the complaints or appeals process of the VVB's Accreditation Body (AB). Stakeholders are encouraged to copy auditing@verra.org in communications for VVB monitoring purposes.
Concerns about illicit activity and/or imminent harm unrelated to a Project	Concerns about illicit activity and/or imminent harm unrelated to a Project which may involve stakeholders connected to a Project and usually due to a third-party dispute.	Stakeholders are encouraged to submit these concerns directly to the appropriate legal authorities.

6 SUBMISSION OF GRIEVANCES

6.1 Eligibility Thresholds

When submitting a Grievance, the Complainant must satisfy the following mandatory requirements depending on the Grievance category:

- (a) The Grievance falls within the definition of a “Grievance” under this Process;
- (b) For Grievances raising potential non-conformance of a Project with Verra Program Rules and Requirements, the Complainant must substantiate any allegation and provide evidence that the relevant Project Grievance Redress Mechanism has failed to provide a response or address the substance of the Complaint within 3 months.

6.2 Grievance Intake Form

All Grievances must be submitted using the Grievance Intake Form available via Verra’s Project Hub. The Grievance Intake Form will require the Complainant to provide certain essential information, including the following:

- (a) Full name and, if anonymous or confidential, a written justification for wishing to retain anonymity or confidentiality.
- (b) Name(s) of all organization(s) the Complainant is seeking redress against, where relevant.
- (c) Project ID number, if available.
- (d) The details of the Grievance, including the following supporting evidence:
 - i. Complaints challenging Verra’s decision under Section 4.1(a): details on the relevant decision made by Verra that is subject to the Complaint, as well as any new information or information that may have been omitted by Verra to make the initial decision.
 - ii. Complaints or Referred Grievances raising a potential non-conformance of a Project with Verra Program Rules and Requirements under Sections 4.1(b) or 4.2: details of the concerns about the potential non-conformance, supporting evidence to substantiate the allegation of non-conformance, as well as evidence, in case of a Complaint, that the Project Grievance Redress Mechanism has failed to provide a response or address the substance of the Grievance within the timelines established in Section 4.1.

Verra may grant exceptions to the mandatory use of the Grievance Intake Form for Indigenous People/Local Communities to guarantee their access to this Process. Indigenous People/Local Communities are encouraged to reach out to secretariat@verra.org and complaints@verra.org to submit their Grievance or any questions related to this Process or the Grievance Intake Form, should the Grievance Intake Form not be a viable means of submitting a Grievance.

6.3 Acknowledgments

By submitting a Grievance to Verra, the Complainant acknowledges that it will:

- (a) adhere to the provisions of this Process and failure to do so may result in Verra dismissing the Grievance at its sole discretion;
- (b) take full responsibility for all information submitted as part of the Grievance, including any confidential information or personal data; and,
- (c) remove any personally identifiable information or information about third parties if such information is deemed to potentially pose risks relating to privacy, security, and/or retaliation. Verra will process Grievances in accordance with Section 7 below using the information provided by the Complainant 'as is' and the Complainant takes responsibility for the submission under Section 6.3(b) above.

7 PROCESSING OF GRIEVANCES

7.1 Complaints

(a) Objection to a decision made by Verra

In relation to a Complaint pursuant to Section 4.1(a) of this Process, Verra may request further information from the Complainant, as required, to better understand the issues raised. These types of Complaints may result in a change to Verra's original decision if the Complainant can demonstrate that Verra has not acted in accordance with Verra Program Rules and Requirements.

(b) Potential non-conformance of a Project

Complaints raising a potential non-conformance of a Project with Verra Program Rules and Requirements will be processed based on the Project's status on the Verra Registry as follows:

- i. **For projects that have requested registration:** Verra will raise a finding as part of its review of the request. Before approving the request for registration, Verra will check that the PP has addressed the Complaint and the appointed VVB has confirmed the project's conformance with Verra Program Rules and Requirements. Subject to any requirements of confidentiality, upon completion of Verra's review, findings raised, and responses given by the PP and the VVB are included in the Project Review Report and published on the Project's public page in the Verra Registry.
- ii. **For registered projects:** Verra will review all information shared by the Complainant and determine the appropriate mechanism to address the Complaint, which includes:
 - Raising a finding as part of Verra's review of an open verification approval request, if applicable. Before approving the verification approval request, Verra will check that the PP has addressed the Complaint, and the appointed VVB

has confirmed the project's conformance with Verra Program Rules and Requirements. Subject to any requirements for confidentiality, upon completion of Verra's review, findings raised, and responses given by the PP and the VVB are included in the Project Review Report and published on the Project's public page in the Verra Registry.

- Request information or order corrective actions from the PP and/or VVB, as applicable, which may include putting the Project temporarily on hold until the corrective action is taken; and/or,
- Open a Quality Control Review under Section 6 of the RIP which may include putting the Project on hold and suspending further issuances until the Quality Control Review is finalized.

Where no verification request is under review by Verra, Verra may process a potential non-conformance of a registered Project with Verra Program's Rules and Requirements as a Referred Grievance, in accordance with Section 7.2 of this Process. Verra would proceed this way if Verra is unable to take action due to insufficient evidence supporting the Complainant's allegations, or where the concern would not constitute an immediate non-conformance unless it remains unaddressed prior to the subsequent verification request.

7.2 Referred Grievances

Referred Grievances are recorded by Verra. As part of Verra's review of any registration or verification approval request, Verra will check that the PP has addressed any Referred Grievances and that the VVB has confirmed the Project's conformance with Verra's Program Rules and Requirements.

(a) Projects under development

Potential non-conformances of Projects at this stage are communicated to the PP. The PP shall address the Grievance, and upon initiation of the project validation process, submit the Grievance to the appointed VVB, together with relevant details and evidence of the actions taken to address it.

(b) Projects under validation

Potential non-conformances of Projects at this stage are shared with the VVB contracted for validation. The VVB ensures that the PP addresses the Referred Grievance as part of the ongoing validation, in accordance with Verra Program Rules and Requirements, before the PP submits its registration request to Verra.

(c) Registered Projects

In accordance with Section 7.1(b)(ii), potential non-conformances of registered projects may be processed as Referred Grievances.

If the project is not undergoing verification, the Grievance is referred to the PP. The PP must address the Grievance and, upon initiation of the subsequent verification process, submit the Grievance to the appointed VVB, together with relevant details and evidence of the actions taken to address it.

Where a verification is ongoing, Verra refers the Grievance to the appointed VVB. The VVB will ensure that the PP addresses the Grievance as part of the verification process, in accordance with Verra Program Rules and Requirements, prior to the PP submitting its verification approval request to Verra.

8 RESOLVING AND CLOSING A GRIEVANCE

8.1 Complaints

(a) Disagreement with a decision made by Verra

Verra will respond to the Complainant via email, either confirming the initial decision or revising it. Any revised decision will be supported by explanatory comments. Once Verra has shared its decision, the corresponding Complaint is closed. Section 10 specifies the applicable timelines.

(b) Potential non-conformance of a Project

Once Verra has determined the process to address the Complaint in accordance with Section 7.1(b), the Complainant will be informed via email of the next steps.

Verra closes a Complaint when one of the actions listed in Section 7.1.(b) has been taken.

Section 10 specifies the applicable timelines.

8.2 Referred Grievances

Once processed in accordance with Section 7.2, the Referred Grievance will be referred and marked as closed. As part of its review of any subsequent registration or verification request, Verra will check if the subject of the Grievance has been resolved by the PP before approval.

9 RECONSIDERATION REQUEST

Where a Complainant considers that (i) Verra did not take into account key evidence originally provided, or (ii) there is new evidence that may impact Verra's initial Complaint decision, Complainants may submit a Reconsideration Request. The Reconsideration Request comprises three stages: (i) submitting a Reconsideration Request, (ii) processing the Reconsideration Request, and (iii) resolving and closing the Reconsideration Request.

9.1 Submission of a Reconsideration Request

Complainants may submit a Reconsideration Request using the Grievance Intake Form via Verra's Project Hub, providing the following information:

- (a) the decision made by Verra that should be subject to the Reconsideration Request; and

- (b) evidence not taken into account, or any new evidence not submitted in the original Complaint.

9.2 Processing a Reconsideration Request

Verra will process a Reconsideration Request within the procedural timelines set out in Section 10 below. If the Complainant fails to provide the information requested in Section 9.1, the Complainant will not be able to submit the Reconsideration Request. Complainants can resubmit a Reconsideration Request provided that the requirements described in Section 9.1 are met.

Verra will review the Reconsideration Request to determine whether the original decision should be revised or reversed based on the new evidence submitted by the Complainant.

9.3 Resolving and closing a Reconsideration Request

The outcome of the Reconsideration Request shall be final and incapable of further reconsideration or appeal.

10 PROCEDURAL TIMELINES

Indicative timelines are at all times subject to the complexity of the Grievance or Reconsideration Request, for example in terms of volume of Projects and/or stakeholders involved.

Type of recourse	Action	Indicative timelines
Grievance	Acknowledgment and categorization	Automatically after submitting the Intake Form
	Conclusion	3 calendar months from the date of filing
Reconsideration Request	Acknowledgment	Automatically after submitting the Intake Form
	Conclusion	3 calendar months from the date of filing

11 MISCELANEOUS

11.1 Impartiality

Verra is committed to providing Complainants with a fair, transparent, and impartial process to address and resolve all Complaints and Reconsideration Requests. Verra staff implementing this Process will make sure that independence and impartiality are maintained in the handling of Complaints.

11.2 Non-reprisal

Verra will not directly or indirectly threaten, punish, or discriminate against a Complainant solely for submitting a Complaint or Reconsideration Request under this Process.

11.3 Legal Disclaimer

This Process is not intended to substitute, circumvent, or override the legal rights of any party within its local jurisdiction, where available.

11.4 Confidentiality

All information submitted by the Complainant with respect to a Grievance may be shared with relevant parties who have a need to know so that they may review and examine the Complaint. The Complainant may request in writing that some or all information provided be kept confidential. In such a case, the Complainant accepts that confidentiality could hinder the review or examination of the Complaint.

Accordingly, the following information submitted by the Complainant will not be considered

confidential:

- (a) Information that is lawfully in the public domain (including if such information is readily obtained from a website) other than by breach of this Section 11.4;
- (b) Information that is required to be disclosed by any applicable law or Verra Program Rules and Requirements; and,
- (c) Information that is required to be disclosed by governance bodies operating in the voluntary carbon market, such as the Integrity Council for the Voluntary Carbon Market.

Verra's Privacy Policy, as it may be amended from time to time, shall apply to submitted Grievances.

11.5 Expenses

Verra does not require the Complainant to pay any fee for filing a Grievance or Reconsideration Request.