

				Date: 27 September 2022	Document: ICVCM-CCP Part 2 Core Carbon Principles	
No	Comment submitted by	Page	Clause/ Subclause/ Annex [section]	Paragraph/ Figure/ Table/	Comment (justification for change)	Proposed change
1	Verra	3	Additionality		The high-level definition of additionality refers narrowly to "the incentive created by carbon credit revenues", which suggests an inappropriate primary emphasis on financial additionality within the additionality concept.	Change the reference from "carbon credit revenues" to " carbon markets"
2	Verra	3	No double counting		The double counting principle is too broad in stating that all forms of double counting must be avoided. See Verra input on this principle in the SDM part 3.	<ul style="list-style-type: none"> • Include nuance in the high-level double counting principle to recognize that some double counting (but not all) can lead to problems of mitigation efforts being reduced. Suggest replace with: "The GHG emission reductions or removals from a mitigation activity shall not be double-counted where this would lead to a reduction in aggregate mitigation effort." • With this qualifier, it may not be necessary to include the list of double counting cases in the CCP. If it is included, however, it should be specific and not just giving examples, otherwise the list is again too broad. We suggest it would need to be along the lines of "This refers to cases of double issuance (where two mitigation activities are registered or overlap), double use of a credit, and double claiming (where the mitigation activity provides benefits to entities under multiple mitigation policies)."
3	Verra	3	Registry		Systems for holding and making public information on mitigation activities and units are different and are implemented differently by different programs. In practice, programs may combine these functions but, for the purpose of setting requirements, it is clearer to keep these functions separate.	<ul style="list-style-type: none"> • Section D should be reformulated to deal exclusively with registry information, therefore unit information. Public information on mitigation activities should be addressed separately.
4	Verra	4	Robust quantification of emission reductions and removals		Robust quantification doesn't include accuracy	Add accuracy to the beginning of the list of what quantification is based on, e.g., "based on accuracy, conservatism, completeness and sound scientific methods."
5	Verra	4	Transition towards net-zero emissions		As noted in the AF commentary, the point of regulation should be at the program level, not at the methodology or activity level	Change the text to: The carbon crediting program shall have program level requirements to avoid locking in levels of emissions, technologies or carbon-intensive practices that are incompatible with achieving net zero emissions by mid-century.
6	Verra	5	Annex A, attributes		<ul style="list-style-type: none"> • Support attributes for type of mitigation and Article 6 authorization • For SD, do not support the current net positive SDG impacts formulation, which is not defined in the assessment framework, but would support an optional attribute to convey requirements that go beyond a minimum level required for the CCP attribute. • For adaptation, this is too extensive and only countries can assess if action meets their needs 	<ul style="list-style-type: none"> • For SD, suggest replacing the current attribute with an optional attribute to convey requirements that go beyond a minimum level required for the CCP attribute. • For adaptation, suggestion deletion in this form.

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7	Verra	2			The rationale for the order of the principles is unclear.	<p>There should be consistency in the items and sequence between the CCP, SDM and AF. While no order is perfect, we suggest the following (this assumes the assessment outcome is only issued at the program level – see our comments in response to the assessment framework):</p> <ul style="list-style-type: none"> • Additionality • Transition towards net-zero emissions • Robust quantification of emission reductions and removals • Permanence • No double counting • Sustainable development impacts and safeguards • Robust independent third-party validation and verification • Mitigation activity information • Registry • Program governance 	