

CORSIA Eligible Emissions Unit Programme Change Notification Form

Version 2.0; Effective from 10 January 2022

PART A: ABOUT THIS FORM

Once an emissions unit programme is approved by the ICAO Council as eligible to supply CORSIA Eligible Emissions Units, the programme commits to notify the ICAO Secretariat of any “material changes” to its “Scope of Eligibility”, *including any unilateral decision to revoke or invalidate a class of CORSIA-eligible emission units within the programme’s Scope of Eligibility*, for further review¹ by the Technical Advisory Body (TAB) that advises the ICAO Council on the eligibility of emissions units for use in CORSIA.

*TAB Procedures*² defines a “Material Change” as an update to a programme’s *Scope of Eligibility* that would alter the programme’s response(s) to any questions in its application form and further inquiries from the TAB over the course of the programme’s assessment, including programme-initiated unit invalidation and/or revocation. (paragraph 7.3.).

TAB Procedures defines a CORSIA Eligible Emissions Unit Programme’s *Scope of Eligibility* as “the extent and limits of a programme’s eligibility, which is defined, assessed, and granted on the basis of the programme-level governance structures, measures or mechanisms, and procedures that programmes have in place at the time of their initial submission of application materials to the ICAO Secretariat; and any updates to these procedures that are communicated to TAB during the course of its assessment; and as defined in the general or programme-specific eligibility parameters set out in TAB’s recommendations” (paragraph 4.5).

Annually, TAB will indicate deadlines for programmes to notify ICAO of any such material changes. These notifications should be submitted by the next deadline after the material change has occurred; the upcoming deadlines are indicated in the version of the *TAB Work Programme and Timeline* document that is currently effective. This document is available on the CORSIA website³.

Material changes should be disclosed using this form. TAB will then consider the need for any further review, in line with *TAB Procedures*. If TAB identifies that the change is indeed material and should be further assessed, it will invite public comments on the consistency of the proposed revision with the Emissions Unit Criteria (EUC) and *Guidelines for Criteria Interpretation*. The ICAO Secretariat will inform the programme of TAB’s decision to more deeply assess the programme’s modification, or its confirmation that the modification is consistent with the CORSIA EUC. The programme will also be informed of the date by which the review will be completed. The length of the review should be determined by the severity and scale of the material change.

PART B: PROGRAM CHANGE NOTIFICATION(S)

¹ Any unilateral programme-initiated invalidation and/or revocation of a class of CORSIA-eligible emissions units is considered to be a “material change” to the CORSIA-eligible programme’s *Scope of Eligibility*. Such units are regarded as immediately ineligible for use for CORSIA purposes in light of absence of assurance that it will administer the units consistent with its *Terms of Eligibility*. The units will be reflected as exclusions from the programme’s *Scope of Eligibility* in the ICAO Document “CORSIA Eligible Emissions Units” upon Council’s confirmation of the update. Once a programme notifies ICAO that it wishes to exclude a class of units from its eligibility scope, and in order to provide the most accurate and timely information available prior to Council’s confirmation of the update, the ICAO Document “CORSIA Eligible Emissions Units” will identify in a footnote that the programme requested a change to its *Scope of Eligibility* to exclude certain units subject to a decision by the ICAO Council and, if possible, clearly specify the affected class of units. The programme’s *Scope of Eligibility* that is deemed valid by the ICAO Council will be reflected in the ICAO Document titled “CORSIA Eligible Emissions Units” in a timely manner

² In *TAB Procedures*, paragraphs 4.5, 7.3 and 8.2 – 8.6 in particular pertain to the *Scope of Eligibility* and notification and assessment of material changes.

³ The *TAB Work Programme and Timeline* and *TAB Procedures* documents are available here: <https://www.icao.int/CORSIA/ICAO-corsia-tab>

The Programme is requested to provide the following information regarding any modification(s) to the programme’s *Scope of Eligibility* that could constitute a “material change” as described above. Report each change separately by duplicating (copying and pasting) the table below as needed.

Programme name: Verified Carbon Standard (VCS) Program

Methodology updates

CHANGE 1: New module for CO2 Capture from Natural Gas Processing (VMD0062)
a. Description of the change (e.g., the addition, modification, deletion undertaken):
<p>Verra released VMD0062 CO2 Capture from Natural Gas Processing, v1.0, in December 2025 for use under the VM0049 methodology. With this release, Verra has expanded its coverage of emission reduction activities to include natural gas processing plants.</p> <p>This module contributes to the flexible approach offered by VM0049, which enables projects to select from a set of modules for different CO₂ capture, transport, and storage activities and quantify their impact. These modules can be combined to suit a project’s specific design or technological needs. This modular format is adaptive to project expansions and future innovations, and the development of shared infrastructure.</p> <p>Specifically, the VMD0062 module calculates project and leakage emissions from capture at natural gas processing project activities eligible under methodology VM0049. The module is globally applicable and can be used in conjunction with the other modules under VM0049.</p>
b. Rationale for the change:
Carbon credits generated using robust quantification approaches for the natural gas industry are critical components for companies and governments seeking to decarbonize.
c. Where the change is reflected in the Programme’s documentation or other resource(s):
This module can be found here: https://verra.org/methodologies/vmd0062-co2-capture-from-natural-gas-processing-v1-0/
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:
Verra highlighted the release of the VM0049 methodology in a previous material change submission
e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:
There are currently no changes planned. We will inform the TAB of any further updates in future material change submissions.

CHANGE 2: Updates to methodologies
a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra has approved the following revisions to CDM methodologies:

Methodology name	Unique methodology identifier	Sectoral scope
<i>VMR0015 Revision to AMS-III.AV.: Low greenhouse gas emitting safe drinking water production systems</i>	VMR0015	Scope 3
<i>VMR0016 Flaring or Use of Landfill Gas (ACM0001 Revision), v1.0</i>	VMR0016	Scopes 1, 13
<i>VMR0017 Grid-Connected Electricity Generation From Renewable Sources</i>	VMR0017	Scope 1

Verra has approved the following new and revised VCS methodologies, modules, or tools:

Methodology name	Unique methodology identifier	Sectoral scope
<i>VM0042 Improved Agricultural Land Management, v2.2</i>	VM0042, v2.2	Scope 14
<i>VMD0054 Estimating Leakage from the Displacement of Agricultural Activities, v1.1</i>	VMD0054	Scope 14
<i>VMD0062 CO2 Capture from Natural Gas Processing (as noted in Change 1 above)</i>	VMD0062	Scope 16
<i>VT0014 Estimating Organic Carbon Stocks Using Digital Soil Mapping, v1.0</i>	VT0014	Scope 14
<i>VT0015 Calculation of Reductions and Removals for VM0003, VM0005, VM0012, and VM0034, v1.0</i>	VT0015	Scope 14

b. Rationale for the change:

Revisions of CDM methodologies:

VMR0015 was revised to align with the latest methodological and scientific advances, while *VMR0016* was revised to align with the ICVCM CCP Assessment Framework.

VMR0017 was revised to align with the ICVCM CCP Assessment Framework and to introduce a new framework for renewable energy projects under the VCS Program (see Change 19).

New and revised VCS methodologies:

VM0042, 2.2 was revised to support the methodology's alignment with the ICVCM CCP Assessment Framework.

VMD0054 was revised to broaden its scope and allow the module to be used with VCS methodologies *VM0032*, *VM0042*, and *VM0047*.

VMD0062, see change 1.

VT0014 was released to facilitate the robust and verifiable quantification of reductions and removals from SOC stocks in agricultural land management carbon projects.

VT0015 was released to quantify and distinguish between reductions and removals across Verra's IFM methodologies.

c. Where the change is reflected in the Programme’s documentation or other resource(s):

All methodologies are available on the [VCS Methodologies](#) webpage.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

This material change provides an updated status to the TAB on the above methodologies.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

There are currently no changes planned. We will inform the TAB of any further updates in future material change submissions.

Program updates

CHANGE 3: Launch of Version 5 of the VCS Standard

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra launched Version 5 of the VCS Program in December 2025. Verra regularly updates the VCS Program so that it reflects the most recent developments related to science, technology, and market practices, but every few years Verra undertakes a more comprehensive overhaul of the program to implement a broader suite of far-reaching changes. The launch of Version 5 of the VCS Program is one such moment.

The Version 5 update is built around three core objectives: increasing program integrity, enhancing accessibility and usability, and refining program scope for maximum impact. VCS Version 5 has been developed through an extensive and rigorous engagement process with internal and external stakeholders, including three public consultations and dialogues with leading experts and professionals in the VCS Program Advisory Group and the Sustainable Development Advisory Group.

Any Version 5 updates do not affect Verra’s conformance to the CORSIA Eligible Emissions Unit Criteria, and the VCS Program remains fully in alignment with all applicable CORSIA requirements. This serves as a high-level summary of the launch of version 5; changes 4-12 below provide more in-depth details on several of the major changes included in the update.

For a comprehensive overview of all updates and their effective dates, refer to the following document: <https://verra.org/wp-content/uploads/2026/03/Dec-2025-VCS-Version-5-Overview-of-Program-Updates-and-Effective-Dates-revised-March-2026.pdf>.

b. Rationale for the change:

The justification for launching Version 5 includes the following:

Increasing integrity: Version 5 raises the bar on several fronts, most notably by requiring a rigorous, evidence-based framework for establishing the right to operate and the right to reductions

and removals, and by strengthening FPIC and benefit-sharing requirements to better protect Indigenous Peoples and local communities.

Keeping pace with evolving science and market practice: Carbon market methodologies and the science underpinning them continue to develop rapidly. More frequent baseline reassessments and crediting period renewals ensure that all projects apply the most recently approved methodologies, tools, and modules.

Expanding into new sectors: Version 5 introduced new sectoral scopes for Oceans and Marine Resources and Engineered Removals, reflecting that the markets and technologies needed to meet global climate targets extend beyond the program's traditional areas. Version 5 positions the VCS Program to support climate action in these emerging sectors.

Improving usability: The update also reflects efforts to make the program more accessible and easier to navigate. The new project classification system, digital-first approach, and clearer definitions for project start dates are all aimed at reducing friction for project proponents and VVBs, and at making the program more efficient to administer and audit.

c. Where the change is reflected in the Programme's documentation or other resource(s):

The following program documents were updated as part of the launch of version 5:

- [VCS Standard, v5.0 \(PDF\)](#)
- [VCS Program Guide, v5.0 \(PDF\)](#)
- [VCS Program Definitions, v5.0 \(PDF\)](#)
- [VCS Methodology Requirements, v5.0 \(PDF\)](#)
- [Registration and Issuance Process, v5.0 \(PDF\)](#)
- [Procedure for Applying the AFOLU Non-Permanence Risk Tool, v5.0 \(PDF\)](#)
- [Procedure for Applying the GCS Non-Permanence Risk Tool, v5.0 \(PDF\)](#)
- [GCS Requirements, v5.0 \(PDF\)](#)
- [VCS Sectoral Scopes and Project Classification Guidance, v5.0 \(PDF\)](#)

In addition, the effective dates for all updates are available here: <https://verra.org/wp-content/uploads/2026/03/Dec-2025-VCS-Version-5-Overview-of-Program-Updates-and-Effective-Dates-revised-March-2026.pdf>.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The release of Version 5 has been noted in Verra's previous submissions to the TAB.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 4: Update to remove "approved GHG programs" and GHG credit conversions

a. Description of the change (e.g., the addition, modification, deletion undertaken):

As part of the Version 5 update, the VCS Program no longer maintains a list of approved GHG programs. Previously, projects registered with such programs were able to 1) transfer to the VCS Program via a simplified gap validation process, and 2) convert GHG credits issued under such programs to be issued as verified carbon units (VCUs).

Projects registered with another GHG program must now be validated against the full VCS Program to be eligible. Further, Verra requires such projects to meet registration deadlines tied to the VCS initial crediting period start date and date of project inactivity in the other GHG program.

Projects registered or previously registered under another GHG program are only eligible for VCU issuance for reductions and removals occurring after the date of project inactivity in the other GHG program. This requirement has not changed.

No GHG credits issued under another GHG program can be converted into VCUs.

b. Rationale for the change:

The VCS Program is operating at a higher level of integrity than before and is no longer comparable with previously approved GHG programs.

Verra has been transitioning away from recognizing approvals issued under other GHG programs as equivalent. For example, Verra now maintains its own VVB and methodology approval processes and no longer automatically considers VVBs and methodologies approved by other GHG programs to be eligible for implementation under the VCS Program.

c. Where the change is reflected in the Programme's documentation or other resource(s):

VCS Standard, v5.0, Sections 3.21.3 – 6

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The release of version 5 has been noted in Verra's previous submissions to the TAB.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 5: Revised procedures for crediting period renewal and baseline reassessment intervals

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Crediting period lengths and baseline reassessment intervals have been shortened to 5 years for most project types. This ensures that projects conform with the latest VCS Program rules and requirements, apply the most current methodology, tools, and modules, and demonstrate regulatory surplus and reassess their baselines at more frequent intervals. The following table shows the updated baseline reassessment intervals and crediting period lengths.

Project type	Baseline reassessment intervals	Crediting period length	Number of times renewable	Max. total project crediting period duration
ALM with SOC stock change	In accordance with the methodology	20–100 years	4	100 years
ARR	In accordance with the methodology	20–100 years	4	100 years
IFM	5 years	20–100 years	4	100 years
REDD where the baseline is not allocated from jurisdictional level data	5 years	20–100 years	4	100 years
REDD where the baseline is allocated from jurisdictional level data	In accordance with the methodology	20–100 years	4	100 years
Avoided conversion of grasslands and shrublands (ACoGS)	5 years	20–100 years	4	100 years
Conversion of intact wetlands (CIW)	5 years	20–100 years	4	100 years
Restoring wetland ecosystems (RWE)	In accordance with the methodology	20–100 years	4	100 years
GCS	At crediting period renewal	5 years	8	45 years
E&I	At crediting period renewal	5 years	2	15 years
ALM without SOC stock change	At crediting period renewal	5 years	2	15 years
Livestock systems (LS)	At crediting period renewal	5 years	2	15 years

Further, Section 3.8.8 of the VCS Standard v5.0 states that certain projects may be eligible for additional crediting period renewals, as specified in the applied methodology. In such cases, the maximum number of additional crediting period renewals is indicated in the methodology.

As part of the update, the demonstration of regulatory surplus is more explicitly included in the baseline reassessment.

b. Rationale for the change:

The primary motivation to advance these changes was to enhance consistency across project types and ensure integrity.

c. Where the change is reflected in the Programme’s documentation or other resource(s)⁴:

Crediting period length update: *VCS Standard v5.0*, Sections 3.8.4 and 3.8.8
Baseline reassessment interval update: *VCS Standard v5.0*, Section 3.2.3

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

The release of Version 5 has been noted in Verra’s previous submissions to the TAB.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 6: New rules for grouped projects

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra identified that the grouped project concepts and requirements led to inconsistent project design and required further strengthening.

In light of those issues, Verra introduced a number of changes listed below:

- 1) Clarified the definition of project activity instance (PAI) and provided examples of PAIs.
- 2) Methodology capacity limits must be applied at the project level rather than at the PAI level.
- 3) Consolidated conditions to identify whether a project is a fragment of another project, which would render the project ineligible.
- 4) Renamed geographic areas as eligibility areas and clarified that eligibility areas must align with jurisdictional boundaries within a single country and cannot span more than a country.
- 5) Introduced new criteria for new PAIs being added to a project. Notably, a new criterion requires PAIs to be added to a project within the same monitoring period in which they are implemented.
- 6) Introduced the concept of a batch (referring to a set of new PAIs) and a new batch inclusion form to facilitate transparent and robust reporting on new PAIs being added to a project

b. Rationale for the change:

The changes above reflect more rigorous requirements to reduce risks of retroactive crediting in grouped projects. Further, the requirements were rewritten to provide greater clarity to stakeholders, with the aim of achieving consistent, high-integrity project design.

c. Where the change is reflected in the Programme’s documentation or other resource(s)⁵:

- 1) *VCS Standard, v5.0*, Section 3.5
- 2) *VCS Program Definitions, v5.0* (see grouped project, eligibility area, and initial instance, instance)
- 3) *Batch Inclusion Form, v5.0* (forthcoming)

⁴ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

⁵ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The release of version 5 has been noted in Verra's previous submissions to the TAB.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 7: Enhanced stakeholder engagement requirements

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra identified inconsistent reporting and application of requirements for stakeholder engagement across different project types, along with confusion about how to adequately engage stakeholders who differ in how they influence or are affected by the project.

In light of those issues, Verra raised the bar for stakeholder engagement and introduced more specific, stepwise requirements outlined below:

- 1) Clarified that meaningful stakeholder engagement must occur before the project start date.
- 2) Introduced requirements to develop and implement a stakeholder engagement plan that is tailored to stakeholders' specific needs and varying levels of required engagement (e.g., FPIC from customary rights holders and IPs, enabling influence from directly affected stakeholders, collaborating with key enabling stakeholders).
- 3) Enhanced FPIC requirements with revised definitions for customary rights, IPs, local communities (LCs), and FPIC, including to reach a written project implementation agreement that includes terms of the benefit-sharing mechanism, where relevant.
- 4) Expanded requirement for project proponents to design a benefit-sharing mechanism jointly with rights holders where land or resource rights are impacted, and customary rights holders or IPs are identified in the project area.
- 5) Included new requirements for advancing financial transparency and fair benefit-sharing, where benefit-sharing mechanisms are required. Specifically, new rules to:
 - a) Co-design the mechanism with participants.
 - b) Provide participants with financial information on project revenues and costs.
 - c) Allow in-kind benefits to be part of the mechanism and clarify what does not constitute a benefit.
 - d) Co-develop (with participants) a plan to ensure the continued function and utility of in-kind benefits related to long-term infrastructure not required to implement project activities.
- 6) Strengthened grievance redress mechanism requirements, including explicit requirements to make the mechanism available to stakeholders at the earliest stages of project development.

7) In the <i>VCS Program Definitions</i> , definitions were added or revised for customary rights; free, prior, and informed consent; grievance redress mechanism; Indigenous Peoples; local communities; marginalized people; stakeholder; stakeholder engagement; stakeholder group; stakeholder private and confidential information; project grievance; project worker; vulnerable people.
b. Rationale for the change:
The changes above reflect more rigorous requirements to reduce the risk of inadequate or superficial engagement with stakeholders who are critical to the project. Further, the requirements were rewritten to provide greater clarity and to be process-oriented, resulting in standardized stakeholder engagement processes across projects and, in turn, achieving a consistent, high-integrity project design.
Further, updated templates and guidance are under development to demonstrate conformance with the <i>VCS Standard</i> requirements and help project proponents, validation/verification bodies, and other interested users understand, in greater depth, the background and rationale behind the <i>VCS Standard</i> requirements (including examples for different project types and good international practices).
c. Where the change is reflected in the Programme’s documentation or other resource(s)⁶:
1) <i>VCS Standard, v5.0, Section 3.17</i> 2) <i>VCS Program Definitions, v5.0</i> (listed above)
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:
The release of Version 5 has been noted in Verra’s previous submissions to the TAB.
e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:
We will inform the TAB of any further updates in future material change submissions.

CHANGE 8: Enhanced safeguard requirements
a. Description of the change (e.g., the addition, modification, deletion undertaken):
Verra identified inconsistent reporting and application of safeguard requirements across different project types, including confusion about which requirements apply to which projects.
In light of those issues, Verra raised the bar for safeguards and introduced more specific requirements outlined below:
1) Clarified that project proponents must assess risks and apply adaptive management to enhance protection to stakeholders and the environment, as follows:

⁶ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

- a) conduct an environmental, social, and governance risk assessment to evaluate the potential negative impacts of the project
 - b) design commensurate mitigation measures that address the safeguards requirements and any other risks identified in the assessment
 - c) implement the mitigation measures
 - d) monitor project risks and the effectiveness of mitigation measures, throughout the project lifetime and apply adaptive management to ensure mitigation measures remain effective.
- 2) New governance requirements (e.g., anti-corruption, anti-money laundering, illegal activities, emergency preparedness and response).
 - 3) Enhanced social safeguard requirements, including for gender equality, and armed personnel.
 - 4) Enhanced ecosystem conversion safeguards requirements, including:
 - a) Clarification that projects must not further degrade or convert an ecosystem to a type T7 ecosystem.
 - b) Prohibition of ecosystem conversion, except for ARR, ALM, or WRC projects where either of the following conditions are met:
 - i) The ecosystem exhibits high ecosystem degradation for at least 10 years prior to the project start date
 - ii) High ecosystem degradation has occurred within 10 years prior to the project start date, and:
 - the disturbances are unrelated to the project, and
 - ecosystem degradation was not carried out by the project proponent.
 - c) Demonstration that the project activity is improving the ecosystem integrity toward ecologically suitable and appropriate reference conditions justified for the project or an adapted state based on scientific evidence, for ARR and WRC projects that restore ecosystems.
 - 5) In the VCS Program Definitions, added, deleted, or revised definitions for (in addition to those listed in the stakeholder engagement sections) biodiversity, commercially sensitive information and program sensitive information (formerly sensitive information), degraded ecosystem, ecosystem, ecosystem conversion, ecosystem degradation, ecosystem integrity, ecosystem restoration, forest, forest degradation (formerly degradation), grassland, native ecosystem, land or resource rights, and safeguard.

b. Rationale for the change:

The changes above reflect more rigorous requirements to reduce the risk of inadequate or superficial risk assessments. Further, the requirements were rewritten to provide greater clarity regarding the relationship between the risk-based approach and the safeguards requirements, with the aim of achieving a consistent, high-integrity project design.

Further, updated templates and guidance are under development to demonstrate conformance with the *VCS Standard* requirements and help project proponents, validation/verification bodies, and other interested users understand, in greater depth, the background and rationale behind the *VCS Standard* requirements (including examples for different project types and good international practices).

c. Where the change is reflected in the Programme's documentation or other resource(s)⁷:

- 1) *VCS Standard, v5.0*, Section 3.18
- 2) *VCS Program Definitions, v5.0* (listed above)

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

⁷ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

The release of Version 5 has been noted in Verra’s previous submissions to the TAB.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 9: New VCS project classification system and sectoral scopes

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Sectoral Scope changes: Sectoral scope 14 has been split into “14. Forestry and other land use (forests, wetlands, and grasslands)” and “15. Agriculture.” A new sectoral scope has also been added for “Other engineered removals.” Finally, a new sectoral scope called “Ocean and marine resources” was added under the VCS Program.

Project Classification System: The VCS Program introduced a new classification system that defines project categories and activity types across all sectoral scopes. Previously, these were only defined for AFOLU projects.

Minor changes to existing project categories and project activity types within sectoral scopes 14 and 15 include:

- New project activity types were defined for ARR:
 - ARR for plantation forestry
 - ARR for ecosystem restoration
 - ARR for agroforestry
 - ARR for all other purposes
- “Enhanced sequestration” was defined as a new project activity type under IFM
- Two new project activity types were added under ALM
 - Restoration of degraded agricultural land
 - Enhanced weathering applications in agriculture
- A new project category called “livestock systems” was added under sectoral scope 15 (Agriculture)

b. Rationale for the change:

Sectoral scope changes: The changes were made to the VCS Program sectoral scopes in order to more closely align with the sectoral scopes defined under other market frameworks, such as the Paris Agreement Crediting Mechanism accreditation framework (see [A6.4-STAN-ACCR-001, Appendix 2](#)). The “Ocean and marine resources” sectoral scope was added to enable future methodology development under this emerging climate mitigation sector.

Project Classification System: The classifications were developed based on the most common breakdowns used by major ratings agencies (i.e., MSCI/Trove and Be Zero), VVB accreditation requirements, and the existing portfolio of projects under each sectoral scope in the Verra Registry. This will assist Verra’s digitization efforts, improve transparency and usability for PPs and VVBs, and enable better comparability and compatibility with carbon markets. It will also help to determine VVB accreditation and competency requirements at a more granular level than sectoral scopes.

c. Where the change is reflected in the Programme’s documentation or other resource(s):

For the full list of sectoral scopes, see the [VCS Program Guide, v5.0](#), section 2.4.
For the full list of project categories and project activity types under all sectoral scopes in the new project classification system, see the [VCS Sectoral Scopes and Project Classification Guidance, v5.0](#).

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The release of Version 5 has been noted in Verra's previous submissions to the TAB.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 10: Changes to default eligibility for certain project activities (Table 1 in the VCS Standard)

a. Description of the change (e.g., the addition, modification, deletion undertaken):

To simplify program rules and delegate activity specific requirements to methodologies, the VCS program team modified Table 1 of the VCS Standard to empower methodologies to define geographic eligibility. Table 1 now defines 'default eligibility' instead of scope exclusions. This means that where a methodology defines eligibility differently, the methodology takes precedence over Table 1. All affected methodologies will be updated through revisions or corrections and clarifications. Once all affected methodologies have been updated, Verra intends to remove Table 1 from the VCS Standard entirely to allow methodologies' eligibility requirements to prevail. All subsequent updates to the scope or eligibility of activities will be handled in the respective methodologies.

In addition, we changed the default eligibility of the following activities:

- efficient lighting is limited to only small-scale projects in least developed countries
- activities installing or replacing electricity transmission lines or transformers are no longer included in Table 1
- activities that reduce HFC-23 are no longer included in Table 1

b. Rationale for the change:

Improve clarity and simplify program rules. It is also more efficient to include project activity eligibility exclusively in methodologies, as methodologies can be updated more regularly than the VCS Standard.

- LED lighting is becoming increasingly prevalent in all but LDCs, with the risk of non-additional projects being very difficult for VVBs to discern
- No active methodologies in the VCS allow activities installing or replacing electricity transmission lines or transformers, thus this row is not required
- HFC-23 reduction project activities are problematic when applied in the context of HFC-23 generated as an industrial by-product. There are no active methodologies in the VCS that allow the reduction of HFC-23 as an industrial by-product, and thus, this row is not required.

c. Where the change is reflected in the Programme's documentation or other resource(s):

The revised Table 1 in VCS Standard v5.0 can be found here: <https://verra.org/wp-content/uploads/2025/12/VCS-Standard-v5.0.pdf>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The release of Version 5 has been noted in Verra's previous submissions to the TAB.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 11: Updated procedures for leakage emissions from equipment

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra included new requirements that all methodologies include procedures for quantifying leakage emissions from project activities that replace or discontinue the use of equipment used in the baseline scenario.

Where a project replaces equipment, the methodology must include procedures to assess and quantify any potential leakage resulting from the displaced equipment being relocated and used outside of the project area. This is particularly important where equipment retains operational value and could continue to generate emissions elsewhere, for example, where machinery, cookstoves, or other devices are transferred to other users or regions, rather than being retired.

Where equipment is discontinued or destroyed as part of the project, the methodology must assess and quantify any emissions associated with its decommissioning. This includes emissions arising from the disposal or destruction process itself, ensuring they are appropriately accounted for in the overall calculation of net benefits.

b. Rationale for the change:

Leakage from displaced or decommissioned equipment can be a source of unaccounted emissions that could undermine the environmental integrity of projects. While many methodologies already included procedures to assess relevant forms of leakage, meaning this may have been captured in practice, without explicit requirements, there was a risk that equipment-related leakage was not consistently identified and quantified.

This change standardizes the treatment of equipment-related leakage across all methodologies, ensuring that displacement and decommissioning scenarios are explicitly addressed. This change further strengthens confidence in the accuracy of emissions accounting under the VCS Program.

c. Where the change is reflected in the Programme's documentation or other resource(s):

VCS Methodology Requirements, section 3.7.2

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The release of Version 5 has been noted in Verra's previous submissions to the TAB.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 12: Minor update to reporting requirements for sustainable development goal (SDG) contributions

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra made a minor update to incorporate the existing requirement to demonstrate quantifiable contributions from the *VCS Monitoring Report Template* into the *VCS Standard* and to streamline the wording of the requirements.

In the forthcoming Version 5 templates, the accompanying table for reporting SD contributions will be clarified, and accompanying guidance will be provided to support projects in identifying their project-level contributions aligned with the SDGs and their indicators.

b. Rationale for the change:

Verra identified that the requirement for projects to demonstrate quantifiable contributions to specific SDG targets and indicators during the monitoring period, using the official list of SDG targets and indicators and providing supporting evidence, was stated explicitly only in the *VCS Monitoring Report Template*.

c. Where the change is reflected in the Programme's documentation or other resource(s):

- 1) *VCS Standard*, v5.0, Section 3.16
- 2) Updated v5.0 sections of the *VCS Project Description Template*, *VCS Monitoring Report Template*, *VCS Validation Report Template*, and *VCS Verification Report Template* (forthcoming)
- 3) *Guidance on safeguard-related requirements (including sustainable development contributions) for the VCS Standard*, v5.0 (forthcoming)

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The release of Version 5 has been noted in Verra's previous submissions to the TAB.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 13: Revised Article 6 Label Guidance document

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra released v1.1 of the Article 6 Label Guidance document in April. The revised guidance document includes the following updates:

- Introduction of an Article 6 Correspondingly Adjusted label to identify VCUs for which a corresponding adjustment (CA) has been applied by the host country, ensuring the mitigation outcome is not double counted toward the host country's national inventory. Such VCUs can be publicly labeled on the Verra Registry, enabling greater transparency of when a CA has been applied by the host country.
- The document also describes that Verra only accepts evidence of a completed CA in a BTR submitted by the host country to the UNFCCC; other intermediary reports are not considered sufficient.
- Updated eligibility requirements for the Article 6 Authorization labels, including:
 - Clarification that LOAs must include all required elements in decision 4/CMA.6, paragraph 5.
 - Requirement that the LOA is uploaded to the UNFCCC CARP, or a national registry, where relevant.
 - Specification that where a project spans multiple countries, LOAs must be provided from each country from which VCUs will be labeled.
 - Where relevant, project proponents must submit a Letter of Positive Examination (LOPE) or equivalent instrument.
- The revised document encourages the use of the voluntary UNFCCC template for LOAs and includes guidance to support project proponents completing the template for VCS projects.
- The document clarifies the conditions under which Verra removes Article 6 labels, based on non-application of a CA or revocation of an LOA by a host country. These conditions may be detected by Verra or reported by project proponents or host countries.
- Streamlined processes for requesting labels, drawing on Verra's experience assessing LOAs, including a supplementary LOA checklist for project proponents.

b. Rationale for the change:

Verra updated the guidance document to align with the latest UNFCCC decisions and to clarify expectations for LOAs, especially where one of the authorized uses includes CORSIA. The updated guidance also draws on Verra's experience in reviewing and assessing LOAs submitted to date, incorporating lessons learned to better reflect real-world complexities and common points of confusion. Overall, these updates aim to streamline and simplify processes for project proponents, host countries, and other relevant entities involved in the authorization process, reducing ambiguity and supporting more efficient and consistent outcomes.

c. Where the change is reflected in the Programme's documentation or other resource(s):

The updated guidance document can be found here: <https://verra.org/wp-content/uploads/2026/04/Article-6-Label-Guidance.pdf>

The LOA checklist can be found here: <https://verra.org/wp-content/uploads/2026/04/Article-6-Letter-of-Authorization-Checklist-for-Project-Proponents.pdf>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

Verra has previously mentioned that updates to the Article 6 Label Guidance document were in development.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 14: Revised CORSIA Label Guidance document

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra released v1.1 of the CORSIA Label Guidance document in April. The main changes include the following:

- The updated guidance adds criteria to indicate which VCUs are eligible for the CORSIA second phase (2027–2029).
- It also includes updates related to the CORSIA insurance criteria and CORSIA Accounting Representation Deed, which are components relevant for project proponents that use insurance.
- It provides a clearer distinction between the CORSIA scope and the CORSIA-eligible labels.
- Verra incorporated a requirement that all CCS projects requesting CORSIA labels demonstrate that their projects meet the CORSIA Eligibility Requirements for Geological CCS projects. We will integrate these requirements into the next update to Verra's *Geological Carbon Sequestration (GCS) Requirements*.
- Verra has incorporated a requirement that all projects requesting CORSIA labels must quantitatively demonstrate that their baselines are below business-as-usual (BAU) levels.
- Finally, updates were made to align the CORSIA Label Guidance document with the revisions made to the Article 6 Label Guidance document.

b. Rationale for the change:

The release of v1.1 of the CORSIA Label Guidance primarily aims to ensure that CORSIA-labeled credits meet the VCS Program's updated eligibility for CORSIA.

In addition, updates to the insurance approach and the CORSIA Accounting Representation Deed address practical needs identified through Verra's experience administering these processes. Finally, alignment with the Article 6 Label Guidance ensures consistency across Verra's labeling framework, supporting a more streamlined experience for project proponents operating across both.

c. Where the change is reflected in the Programme's documentation or other resource(s):

The updated guidance document can be found here: <https://verra.org/wp-content/uploads/2026/04/Corsia-Label-Guidance.pdf>.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

Verra has previously reported on v1.0 of the CORSIA Label Guidance document.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

Further action requests

CHANGE 15: Long-term plan for program longevity

a. Description of the change (e.g., the addition, modification, deletion undertaken):

The information here intends to clarify Verra's plans for the long-term administration of the VCS Program.

Long-term program governance

Verra was founded in 2007 by environmental and business leaders who saw the need for greater quality assurance in voluntary carbon markets. Verra now manages the world's leading voluntary carbon markets program, the Verified Carbon Standard (VCS) Program, as well as a suite of other programs, including the following: Climate, Community, and Biodiversity Standard, Sustainable Development and Verified Impact Standard, Plastic Program, and a Scope 3 Program Standard (to be launched in Q3 2026).

Verra's status as a 501(c)(3) nonprofit is not incidental to its role as a standard-setting body. It is foundational to it. The organizational structure was deliberately chosen and continues to shape how Verra operates, makes decisions, and earns the market's trust. As a nonprofit, Verra has no shareholders, no profit motive, and no external owners whose financial interests could conflict with the integrity of the standards it sets. Every dollar generated through program fees, grants, or philanthropic contributions is reinvested into the organization's mission. That alignment between revenue and purpose is what allows Verra to make decisions based on what is right for the market and the environment, not what is most commercially convenient. This is particularly important in standard-setting. Verra's nonprofit structure ensures its rules are set independently, its methodologies grounded in science, and its governance free from commercial influence.

Verra is also built to last. Verra is incorporated under the District of Columbia Nonprofit Corporation Act as a perpetual organization. The Articles of Incorporation explicitly confirm that the period of the organization's duration is perpetual. Unlike a commercial entity, Verra is not exposed to the financial pressures (shareholder demands, leveraged buyouts, insolvency risk from debt obligations) that can cause for-profit organizations to exit markets, restructure, or shut down. A nonprofit with a clear mission, a diversified funding base, and a board-mandated reserve policy is more stable over the long

term than a commercial operator of equivalent size. In the event of dissolution, which Verra's structure makes a remote scenario, the Articles are clear: after satisfying all liabilities, assets must be distributed to one or more organizations qualifying under Sections 170(c)(2) and 501(c)(3) of the Internal Revenue Code. As a 501(c)(3) organization, Verra's assets at dissolution must, by law, be directed to other mission-aligned nonprofits, ensuring continuity of purpose rather than commercial absorption.

Financial sustainability

Verra's financial position reflects both the discipline of a well-governed nonprofit and the deliberate strategic choices of an organization investing in its long-term relevance. In 2024, Verra made a conscious decision to accelerate investment in new methodologies, digital infrastructure, and expanded program capacity in anticipation of voluntary carbon market growth. In 2024, Verra moved decisively to right-size its cost structure. Operating expenses were reduced and restructured to align with market conditions, and the organization returned to a sustainable financial trajectory. Operating reserves continue to exceed six months of operating expenses, a minimum threshold mandated by Verra's Board of Directors as a matter of standing governance policy, providing meaningful and consistently maintained protection against revenue cyclicality.

Verra's revenue base is also increasingly diversified. Program fee revenues are generated across multiple independent standards: the VCS Program, the Climate, Community and Biodiversity Standards, the Sustainable Development Verified Impact Standard, and the Plastic Waste Reduction Program, with the Scope 3 Standard Program set to contribute an additional revenue stream from 2027. Each program operates independently, with its own project pipeline and fee structure.

Verra's existing project portfolio also provides a strong and predictable revenue pipeline. With over 2,300 registered projects spanning multiple sectors and geographies, a significant volume of credits are approved but not yet issued, representing issuances and associated fee revenues that will continue to flow over the coming years and decades as projects complete verification cycles across their crediting periods. This built-in pipeline provides meaningful revenue continuity independent of new project registrations.

As a mission-driven nonprofit, Verra has access to a broad and diversified base of philanthropic capital. This includes restricted and unrestricted funding from foundations, grant programs, corporate partners, and mission-aligned supporters who have a direct interest in the long-term health of high-integrity carbon markets. This access to philanthropic capital, alongside fee-for-service revenues, is a structural advantage of Verra's nonprofit status, providing additional financial resilience that is independent of market volume fluctuations and reinforces the organization's capacity to fulfill its obligations over the long term.

Should the VCS Program ever contract significantly, Verra is confident it could continue to operate it at a minimal level, drawing on program fees, reserves, and other unrestricted revenues. Such a scenario would not necessarily threaten the organization's existence, and reduced operations would still be sufficient to sustain core VCS Program functions. It is also worth noting that the assets created under the VCS Program, VCU's, project records, and registry infrastructure, carry long-term value. It is reasonable to expect that another GHG crediting program or qualified entity would be willing and able to absorb existing projects and JNR programs. The buffer reserve could similarly be transferred to a successor entity, ensuring continuity of the permanence obligations that underpin AFOLU credit integrity.

Verra's operating reserve policy, diversified fee revenues, built-in project pipeline, restructured cost base, and growing philanthropic income provide a layered financial foundation well suited to supporting a program with obligations spanning decades.

Long-term management of Verra Registry

Verra is transitioning to a new registry platform managed by S&P Global, which is expected to come online in Q2 2026. S&P Global is a large, financially resilient organization with a strong track record in registry services. Notably, in instances where S&P has provided registry services for programs that have become insolvent, it has continued to maintain and display all necessary data, demonstrating its commitment to data continuity.

The Verra Registry Terms of Use do not include an end date, except in cases where a user breaches the terms or elects to terminate their use of the Verra Registry with notice to Verra. Importantly, even in the event of termination, several key provisions survive, including those governing the transfer of instruments (Section 7), cancellation and retirement of instruments (Section 8), fees and charges (Section 10), limitation of liability and indemnification (Section 12), confidentiality (Section 16), intellectual property (Section 17), and dispute resolution (Section 19).

All information on the Registry is publicly accessible, and records related to Registry activity are maintained outside the Registry's own infrastructure. This ensures that data remains available and intact even in a worst-case scenario, providing an additional layer of protection and transparency for all program participants.

Durability of Verified Carbon Units (VCUs)

With respect to AFOLU projects, Section 3.2.25 of the VCS Standard v5.0 requires that the permanence of carbon stocks be monitored for a minimum of 40 years. At its discretion, Verra may monitor a project or class of projects with a crediting period of less than 40 years, and reserves the right to monitor a project for permanence without the project proponent's agreement in cases where the proponent terminates the project or its monitoring obligations. To support these requirements, Verra launched the Long-Term Monitoring System (LTMS), a platform designed to detect and monitor reversals within AFOLU projects. The system was officially launched alongside Version 5 of the VCS Standard at the end of 2025.

In addition, Verra introduced a three-year durability pilot with the release of Version 5, which allows the use of insurance or fund-based approaches as alternatives to the traditional pooled buffer account. Insurance is a well-established and highly regulated risk management mechanism widely used across financial markets, and an increasing number of providers are now offering carbon-specific insurance products, including protection against reversal risks. A permanence fund uses investment returns to purchase credits and remedy reversals as needed. Rather than setting aside a discrete number of credits, project proponents monetize credits and contribute a portion of the proceeds to a dedicated fund that can be drawn upon to address a reversal should one occur.

Any VCUs generated under the pilot will receive an "Innovation" label to distinguish these units; such units will not be eligible for use toward CORSIA. After three years, Verra will consider implementing these approaches at the program level. Depending on the piloting outcomes, Verra may consider operationalizing these approaches both during project crediting periods and in the post-crediting period. One key benefit of permitting the use of mechanisms such as a permanence fund includes the provision of long-term financial security for buffer obligations, independent of Verra's operational status.

b. Rationale for the change:

The procedures described here are already in effect; this serves as a clarification of Verra's plan for the multi-decadal administration of the VCS Program.

c. Where the change is reflected in the Programme's documentation or other resource(s):

Information on Verra's governance is available here: <https://verra.org/about/overview/#governance>
The Verra Registry TOU is available here: <https://verra.org/registry/terms-of-use/>
Information on Verra's durability pilot is here: <https://verra.org/wp-content/uploads/2025/12/VCS-Program-Durability-Pilot-Overview-and-Application-Process-1.pdf>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

Verra has previously shared much of the information in the longevity plan with the TAB.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 16: Clarification on Verra’s COI rules and procedures

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Section 2.2 of the *Methodology Development and Review Process* requires that all technical contributors, independent expert reviewers, and grant providers disclose any conflicts of interest. Such parties must complete a conflict of interest (COI) disclosure form to assess potential, perceived, and actual conflicts of interest that could affect a stakeholder's impartiality, objectivity, and ability to make merit-based decisions in the best interest of methodology development.

The COI Forms are reviewed by Verra’s Compliance Counsel and VCS Methodologies team, both of which operate separately from the sectoral teams leading methodology development. This separation is a deliberate safeguard.

b. Rationale for the change:

These procedures have been in effect; this serves as a clarification of Verra’s commitment to COI rules and procedures related to methodology development.

c. Where the change is reflected in the Programme’s documentation or other resource(s):

Section 2.2 in the *Methodology Development and Review Process*: <https://verra.org/wp-content/uploads/2025/12/Methodology-Development-and-Review-Process-v5.1.pdf>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

Verra has previously reported on COI rules and procedures.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 17: Procedures to monitor developments related to CDM methodologies**a. Description of the change (e.g., the addition, modification, deletion undertaken):**

Verra has procedures in place to monitor developments related to CDM methodologies, and their transition to the PACM, and to assess implications for VCS Program methodologies and documents. All methodologies that are active under the VCS, including those from the CDM, are reviewed at least every five years in accordance with the MDRP v5.1 to ensure consistency with technical developments, best practices, and updated VCS Program rules.

Verra maintains a publicly available list of active methodologies on its website and publishes correction and clarifications, or revisions to methodologies where required. Where methodologies are updated, these updates must be applied to new projects when they are registered or to existing projects when their crediting periods renew, if not earlier.

b. Rationale for the change:

The procedures described here are already in place under the VCS Program.

c. Where the change is reflected in the Programme's documentation or other resource(s):

A list of all active methodologies under the VCS Program may be viewed here: <https://verra.org/program-methodology/vcs-program-standard/overview/>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

As further developments take place under PACM, Verra may update these procedures accordingly.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 18: Underlying assumptions in the AFOLU NPRT**a. Description of the change (e.g., the addition, modification, deletion undertaken):**

The AFOLU NPRT provides procedures for analyzing non-permanence risk and determining buffer contributions for agriculture, forestry, and other land use (AFOLU) projects. The tool is available in a digital format in the Verra Project Hub.

The first version of the AFOLU NPRT was developed from 2007–2008 by the VCS AFOLU Advisory Group – a working group of leading experts in each AFOLU project category – and involved an extensive peer review process. In 2010, the tool underwent public stakeholder consultation and was revised as part of VCS Program Version 3. More than 25 independent reviewers, including preminent risk experts, investors, NGO representatives, and project

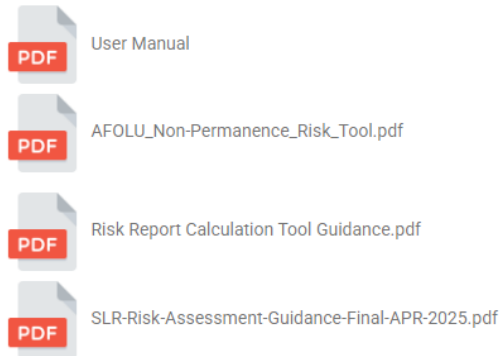
developers, supported these efforts and provided detailed feedback. The VCS AFOLU Steering Committee also provided oversight.

In 2023, Verra revised the tool to include projected future climate change impacts, sea-level rise (SLR), and agricultural land management-specific risks, among other changes. Future climate and SLR impacts are predicted based on information provided by the Intergovernmental Panel on Climate Change (IPCC) in the contribution of Working Group I (the physical science basis) of the Sixth Assessment Report (AR6) and the Special Report on the Ocean and Cryosphere in a Changing Climate (SROCC, 2019). Input was sought through Verra's Nature-Based Solutions working groups and two public stakeholder consultations. Along with these revisions, Verra introduced the digital version of the AFOLU NPRT in the Verra Project Hub. Project proponents must use the digital tool to prepare their non-permanence risk report.

In the Verra Project Hub, several resources provide extra insights into the underlying processes in the NPRT:

Download Guidance PDFs ✕

These two documents explain the AFOLU Non-Permanence Risk Tool in its entirety. The documents also explain the necessary calculations steps that helps to understand how various scores are derived. Users are highly encouraged to read these documents before starting a risk assessment. Tool tips that are provided throughout the tool also refer to these two documents.



Users who are interested in understanding the calculation methods behind this tool can view an Excel version [here](#).

These documents can be downloaded by any user in the Verra Project Hub; they include the following:

- [User Manual](#): Provides guidance on navigating and using the digital version of the tool.
- [Risk Report Calculation Tool Guidance](#): Offers additional background information and a high-level overview of the approach to assess climate change impacts.
- [SLR Risk Assessment Guidance](#): Provides project proponents with detailed guidance on assessing the impacts of sea level rise, including in-depth information on each variable considered in the assessment (e.g., ecosystem degradation, coastal flooding, coastal erosion, and salinization).

b. Rationale for the change:

The information described here was already available on the Verra Project Hub; this serves to further highlight these resources, which provide in-depth insights into the underlying assumptions informing the AFOLU NPRT.

c. Where the change is reflected in the Programme's documentation or other resource(s):

Each of these resources is available for download when accessing the NPRT in the Verra Project Hub: <https://projecthub.verra.org/risk-assessment>.

For ease of access, links have also been provided above.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations

provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

Verra has previously reported on the AFOLU NPRT.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.

CHANGE 19: New Methodology Revision (VMR0017)

a. Description of the change (e.g., the addition, modification, deletion undertaken):

New methodology revision published (Apr 23, 2026) – VMR0017 Grid-Connected Electricity Generation From Renewable Sources (ACM0002 Revision). VMR0017 will serve as the primary methodology for renewable energy (RE) projects and provides a new framework for demonstrating additionality and quantifying the impact of such projects in the VCS. The revision includes the following updates:

- Expanded geographic eligibility of project activities
- New provisions to determine (1) project emissions due to the release of high Global Warming Potential (GWP) agents in Battery Energy Storage Systems (BESS) fire suppression systems and (2) leakage due to embodied emissions (emissions due to construction, operation, and decommissioning of a power plant)
- The replacement of CDM tools with the corresponding VCS tools, as follows:
 - TOOL01 Tool for the Demonstration and Assessment of Additionality is replaced with VT0008 Additionality Assessment
 - TOOL02 Combined Tool to Identify the Baseline Scenario and Demonstrate Additionality is replaced with VT0009 Combined Baseline and Additionality Assessment
 - TOOL05 Baseline, Project and/or Leakage Emissions from Electricity Consumption and Monitoring of Electricity Generation is replaced with VT0010 Emissions from Electricity Consumption and Generation
 - TOOL07 Tool to Calculate the Emission Factor for an Electricity System is replaced with VT0011 Electricity System Emission Factors
- New key requirements related to ownership and siting for projects integrating BESS with a power plant
- Updated source of data and the value applied for the parameter "Default emission factor for emissions from reservoirs" (EFRES) in line with the latest available information and science

b. Rationale for the change:

The revision aims to improve integrity in RE projects and expand the scope of crediting to underserved markets where RE is not growing fast enough and can be accelerated by carbon revenue. This methodology revision also responds to concerns identified by the TAB in Section 4.4.4.3 and 4.4.4.4 relating to additionality and credible baselines in the Sept 2024 Clarifications of TAB's Criteria Interpretations Contained in TAB Reports (link: https://www.icao.int/sites/default/files/environmental-protection/CORSIA/Documents/TAB/TAB2024/Clarifications_Sep2024.pdf)

We assert this revision resolves issues and merits reevaluation for whether to allow eligibility for RE projects greater than 15MW, as is the current limitation. In particular, replacing the CDM tools with Verra's own additionality tools ensures that any renewable energy project seeking VCS certification today faces a meaningfully higher, more rigorous additionality bar. The updated tools apply a more robust and context-specific assessment of additionality, moving away from the prescriptive thresholds and standardized baselines of the CDM tools toward an approach that better accounts for project-specific financial and market conditions.

c. Where the change is reflected in the Programme's documentation or other resource(s):

VCS Methodology website: <https://verra.org/program-methodology/vcs-program-standard/vcs-program-methodologies-active/>

VMR0017 page: <https://verra.org/methodologies/vmr0017-grid-connected-electricity-generation-from-renewable-sources-acm0002-revision-v1-0/>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

This update is a revision to ACM0002 v22, the CDM methodology that would have been reviewed by TAB as part of the original VCS submission.

ACM0002 v22 link:

<https://cdm.unfccc.int/methodologies/DB/XB1TX7TAZ6SLWM9B7BC67THHVD16JV>

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

Subsequent versions of VMR0017 will be communicated to the TAB in future material change submissions.

CHANGE 20: Piloting alternative approaches to assuring no double claiming of CORSIA-labeled VCUs

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Verra is exploring a potential pilot approach that

1. allows the application of CORSIA-eligible labels to issuances from projects that are in countries that are not a party to the Paris Agreement, or activities that are not covered by a host country's NDC (e.g., engineered removals), or both, without assurance of no double claiming, and
2. explores alternative approaches to assuring no double counting over the course of the pilot.

The pilot would run for 1-2 years and be operationalized on a select few projects deemed representative of the broader issue described in section (b) below. At the conclusion of the pilot, Verra intends to translate learnings into a potential procedural or program change that would broaden to become an optimal solution for all jurisdictions. Verra would share learnings with the TAB, with the intent that these approaches could be adopted more broadly across all standards eligible under CORSIA.

For projects participating in the pilot, this approach recognizes that there may be residual risks associated with future changes in national accounting frameworks, including potential changes in participation in the Paris Agreement or NDC accounting, which would need to be carefully considered.

This pilot would explore how to manage these risks using the following preliminary options in place of Article 6 authorization and double claiming assurance:

1 A) Host Country Non-Claim Declaration

A formal statement issued by a relevant government authority confirming that the mitigation outcomes associated with a given project or program will not be counted toward national targets or other sovereign accounting frameworks. This declaration would not rely on Article 6.2 constructs but would provide a clear administrative signal of non-claim, or

1 B) Recognized Institutional Proxy (where direct government confirmation is not available)

In cases where a central government declaration is not feasible, an equivalent statement could be provided by a designated national or subnational authority with jurisdiction over the relevant sector or activity, subject to appropriate safeguards and verification.

2. Enhanced Transparency and Registry Disclosure

Clear and public identification within the registry system that the units are issued under a “non-host-claim” status, including disclosure of the basis for such designation and any supporting documentation. This would support market transparency and enable informed decision-making.

3. Independent Verification of Non-Claim Status

Requirements for independent verification of the non-claim status, by an independent third-party. Such verification should confirm the host country's non-Party status and that no equivalent national accounting mechanism exists through which the mitigation outcome could be claimed.

4. Contractual Safeguards

The non-claim status would be further supported by contractual provisions between project proponents and relevant stakeholders that explicitly address the risk of double claiming. These contractual safeguards would be submitted to Verra as part of the eligibility assessment and would form part of the ongoing compliance obligations for project proponents participating under this pathway.

5. Insurance on the risk of retroactive country claims

Exploring options to create new insurance products with insurers for these retroactive risks associated with future changes in national accounting frameworks, including potential changes in participation in the Paris Agreement or NDC accounting.

6. Additional Risk Mitigation Measures (where appropriate)

In certain cases, other financial risk mitigation instruments could be considered to address residual uncertainty.

Before starting the pilot, Verra wishes to request:

1. Any guidance or feedback from the TAB on the considerations outlined above, including whether and how such approaches could be further assessed in the context of CORSIA requirements and potential relevance for broader market application.

2. Subject to further internal and external consideration, Verra may explore next steps and provide additional detail in future material change submissions, including in August.

b. Rationale for the change:

In the context of CORSIA eligibility, the application of corresponding adjustments (CAs) has become a central element for addressing the risk of double claiming. However, there are specific jurisdictional contexts where the application of CAs is not feasible, including in countries that are not Parties to the Paris Agreement. Further, host countries lack clear guidance for incorporating certain activity types into their individual NDCs, such as engineered removals. Where a host country has not defined how a given removal activity sits within its national inventory, it is practically very difficult for that country to apply a corresponding adjustment.

In such cases, the absence of a formal CA mechanism does not necessarily imply a lack of environmental integrity; rather, it reflects the absence of a legal and institutional framework under Article 6.2. As a result, there may be merit in considering whether alternative forms of host country assurance could be recognized, where appropriate, to address double claiming risks while maintaining environmental integrity.

In this regard, ICAO/TAB may wish to consider a structured alternative pathway applicable in jurisdictions where corresponding adjustments are not available, or for activities outside of a country's NDC targets.

Under such a pathway, the objective would remain consistent: to provide credible assurance that mitigation outcomes are not being claimed by the host country toward its national accounting frameworks. However, the means of demonstrating this assurance would differ from the CA-based approach. This pilot seeks to inform such a pathway.

c. Where the change is reflected in the Programme's documentation or other resource(s):

A website update would be introduced upon approval to solicit interested parties.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

N/A

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

We will inform the TAB of any further updates in future material change submissions.