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| 1. **Name of the VVB:** |  | |
| 1. **Address of VVB:** |  | |
| 1. **Accreditation applied for:** |  |  |
|  |  | |
| 1. **Accreditation Standard:** |  | |
| 1. **Accreditation Scopes and Sectors applied for:** |  | |
| 1. **Brief information about the VVB** | | |
|  | | |
| 1. **Summary of observations** | | |
| 1. **Recommendations** | | |

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| **Clause No. VCS Standard v4.4** | **Description** |  |  |  |  |  |  |
| **3** | **Project Requirements** |  |  |  |  |  |  |
| **3.1** | **General Requirements** |  |  |  |  |  |  |
| **3.1.1** | Do projects meet all applicable rules and requirements set out under the VCS Program. Projects shall be guided by the principles set out in Section 2.2.1 of VCS Standard v4.4. |  |  |  |  |  |  |
| **3.1.2** | Does projects apply methodologies eligible under the VCS Program. Methodologies shall be applied in full, including the full application of any tools or modules referred to by a methodology, noting the exception set out in Section 3.14.1 of VCS Standard v4.4. |  |  |  |  |  |  |
| **3.1.4** | Do projects and the implementation of project activities not lead to the violation of any applicable law, regardless of whether or not the law is enforced |  |  |  |  |  |  |
| **3.1.5** | Where projects apply methodologies that permit the project proponent its own choice of model, does the model meet the requirements set out in the VCS Program document *VCS Methodology Requirements,* and does it be demonstrated at validation that the model is appropriate to the project circumstances |  |  |  |  |  |  |
| **3.1.6** | Where projects apply methodologies that permit the project proponent to choose a third-party default factor or standard to ascertain GHG emission data and any supporting data for establishing baseline scenarios and demonstrating additionally, does such default factor or standard shall meet the requirements set out in the VCS Program document *VCS Methodology* *Requirements*. |  |  |  |  |  |  |
| **3.1.7** | Where the rules and requirements under an approved GHG program conflict with the rules and requirements of the VCS Program, do the rules and requirements of the VCS Program have taken precedence. |  |  |  |  |  |  |
| **3.1.8** | Where projects apply methodologies from approved GHG programs, do they conform with any specified capacity limits and any other relevant requirements set out with respect to the application of the methodology and/or tools referenced by the methodology under those programs. |  |  |  |  |  |  |
| **3.2** | **AFOLU (Agriculture, Forestry, and Other Land Use) - Specific Matters** |  |  |  |  |  |  |
| **3.2.2** | Where projects are located within a jurisdiction covered by a jurisdictional (Reducing Emissions from Deforestation and Forest Degradation) REDD+ program, do project proponents follow the requirements of VCS Standard v4.4 and the requirements related to nested projects set out in the VCS Program document Jurisdictional and Nested REDD+ Requirements. |  |  |  |  |  |  |
| **3.2.3** | Where an implementation partner is acting in partnership with the project proponent, do the implementation partner identified in the project description. Does the implementation partner identify its roles and responsibilities with respect to the project, including but not limited to implementation, management, and monitoring of the project, over the project crediting period. |  |  |  |  |  |  |
| **3.2.4** | Does evidence provided in the project description that any (Afforestation, Reforestation and Revegetation) ARR, (Agricultural land Management) ALM, (Wetland Restoration and Conservation) WRC or (Avoided Conversion of Grasslands and Shrublands) ACoGS project areas were not cleared of native ecosystems to create GHG credits |  |  |  |  |  |  |
| **3.2.5** | Does evidence provide in the project description that any AFOLU project area was not drained or converted to create GHG credits |  |  |  |  |  |  |
| **3.2.6** | Does the project proponent demonstrate that project activities that lead to the intended GHG benefit have been implemented during each verification period in accordance with the project design Where no new project activities have been implemented during a verification period, project proponents shall demonstrate that previously implemented project activities continued to be implemented during the verification period |  |  |  |  |  |  |
| **3.2.7** | For all IFM, Avoiding Planned Deforestation and Degradation (APDD) (except where the agent is unknown), Restoring Wetland Ecosystems (RWE), Avoiding Planned Wetland Degradation (APWD), Avoiding Planned Conversion (APC), and ALM project types, the project proponent shall, for the duration of the project, reassess the baseline every ten years and have this validated at the same time as the subsequent verification. For all Avoiding Unplanned Deforestation and Degradation (AUDD), APDD (where the agent is unknown), Avoiding Unplanned Conversion (AUC), and Avoiding Unplanned Wetland Degradation (AUWD) project types, the project proponent shall, for the duration of the project, reassess the baseline every six years and have this validated at the same time as the subsequent verification. |  |  |  |  |  |  |
| **3.2.8** | Do the following have applied with respect to the baseline reassessment:   1. The reassessment will capture changes in the drivers and/or behaviour of agents that cause the change in land use, hydrology, sediment supply and/or land or water management practices and changes in carbon stocks, all of which shall then be incorporated into revised estimates of the rates and patterns of land-use change and estimates of baseline emissions. 2. The latest approved version of the methodology or its replacement shall be applied at the time of baseline reassessment. The grace periods for using the previous version of a methodology are set out in Section 3.21. 3. The project description shall be updated at the time of baseline reassessment following the requirements set out in Section 3.9.8(2)(d). 4. Ex-ante baseline projections beyond the baseline reassessment period defined above are not required.   Do the following have applied with respect to ALM baseline reassessment:   1. For projects that set their baseline using historical management data specific to the project lands at validation, the historical baseline shall be compared to published data on current common practice in the project region. If there is a significant difference between the historical baseline and current common practice, the project baseline shall be updated to reflect current common practice in the project region at each baseline reassessment event. 2. For projects that set their baseline using regional data on common practice (i.e., data not specific to the project lands), the baseline shall be updated to reflect current practices at each baseline reassessment event using similar datasets (e.g., agricultural census data) as those used to establish the baseline at validation. 3. ALM projects focusing exclusively on reducing N2O, CH4 and/or fossil-derived CO2 emissions (i.e., those that do not include soil organic carbon stocks) are exempted from the 10-year baseline reassessment requirement. |  |  |  |  |  |  |
| **3.2.9** | Where ARR, ALM, (Improved Forest Management) IFM or REDD project activities occur on wetlands, does the project have adhered to both the respective project category requirements and the WRC requirements, unless the expected emissions from the soil organic carbon pool or change in the soil organic carbon pool in the project scenario is deemed below de minimise or can be conservatively excluded as set out in the VCS Program document VCS Methodology Requirements, in which case the project shall not be subject to the WRC requirements. |  |  |  |  |  |  |
| **3.2.10** | Do projects prepare a non-permanence risk report in accordance with the VCS Program document AFOLU Non-Permanence Risk Tool at both validation and verification. Does the non-permanence risk report have prepared using the VCS Non-Permanence Risk Report Template, which may be included as an annex to the project description or monitoring report, as applicable, or provided as a stand-alone document. |  |  |  |  |  |  |
| **3.2.11** | Do projects with tree harvesting have demonstrate that the permanence of their carbon stock is maintained and shall put in place management systems to ensure the carbon against which VCUs are issued is not lost during a final cut with no subsequent replanting or regeneration. Post-harvest replanting and subsequent harvest plans shall be included in a government- or professional forester-approved forest management plan. |  |  |  |  |  |  |
| **3.2.12** | Do WRC projects have demonstrated that the permanence of their soil carbon stock will be maintained. |  |  |  |  |  |  |
| **3.2.13** | DO Buffer credits have deposited in the AFOLU pooled buffer account based upon the non-permanence risk report assessed by the validation/verification body. |  |  |  |  |  |  |
| **3.2.14** | Do projects have performed the non-permanence risk analysis at every verification event. |  |  |  |  |  |  |
| **3.2.16** | When an instance leaves a grouped project or non-grouped project with multiple activity instances before the end of its 30-year longevity period, does the project :   1. Conservatively assume a loss of all previously verified emission reductions and removals associated with the instance; or 2. Continue to monitor the instance for the remainder of the instance’s 30-year longevity period following the monitoring requirements of the applied VCS methodology. If it can be demonstrated that the applied VCS methodology monitoring requirements cannot be followed (e.g., due to loss of access to the project area), a robust remote-sensing-based approach for the project types may be used to detect loss events, upon Verra approval. If a loss is identified, the size of the loss shall be quantified according to the applied methodology. Where this is not possible, the project shall conservatively assume a loss of all previously verified emission reductions and removals associated with the instance. |  |  |  |  |  |  |
| **3.2.17** | When a project crediting period is greater than 30 years, do the requirements under Section 3.2.16 apply until the end of the crediting period. |  |  |  |  |  |  |
| **3.2.18** | Where an event occurs that is likely to qualify as a loss event, does the project proponent follow the loss event reporting requirements set out in the VCS Program document Registration and Issuance Process. |  |  |  |  |  |  |
| **3.2.19** | At the verification event subsequent to the loss event, does the monitoring report restate the loss from the loss event and calculate the net GHG benefit for the monitoring period, including the loss event, in accordance with the requirements set out in the methodology applied and the VCS Program document Registration and Issuance Process. |  |  |  |  |  |  |
| **3.2.20** | At a verification event, where a reversal has occurred, do the following applies:   1. Where the reversal is a catastrophic reversal, the project proponent shall follow the buffer account reconciliation requirements set out in the VCS Program document Registration and Issuance Process, and the following applies:    1. The baseline may be reassessed, including any relevant changes to baseline carbon stocks and, where reassessed, shall be validated at the time of the verification event subsequent to the reversal. Note that allowing baseline revisions after catastrophic reversal supersedes any methodological requirements for a fixed baseline.    2. The same geographic boundary shall be maintained. The entire project area, including areas degraded or disturbed by the catastrophic event, shall continue to be a part of project monitoring. Projects may not seek GHG credits from any increased rate of sequestration from natural regeneration after a catastrophic reversal until the loss from catastrophic reversals is recovered. 2. Where the reversal is a non-catastrophic reversal (e.g., due to poor management, removal of a portion of the project area from participation in the project, or over-harvesting), the project proponent shall follow the buffer account reconciliation requirements set out in the VCS Program document Registration and Issuance Process, and the following applies:    1. No further VCUs shall be issued to the project, or any other project with the same project proponent or combination of project proponents, until the deficit is remedied. The deficit is equivalent to the full amount of the reversal, including GHG emissions from losses to project and baseline carbon stocks.    2. The same geographic boundary shall be maintained. The entire project area, including areas degraded or disturbed by the non-catastrophic event, shall continue to be a part of project monitoring. Projects may not seek GHG credits from any increased rate of sequestration from natural regeneration after a reversal until the loss from non-catastrophic reversals is recovered. |  |  |  |  |  |  |
| **3.2.23** | Where ARR and IFM projects meet or exceed the harvesting activity definition, does the long-term average applied. The stratification of the sample plots shall be proportionally representative of areas with and without harvesting activity. Projects with harvesting activities shall calculate the long-term average for the area of each stratum and cover the entire project area. |  |  |  |  |  |  |
| **3.2.24** | ARR and IFM projects with harvesting activities shall not be issued GHG credits above the long-term average GHG benefit maintained by the project. Where ARR or IFM projects include harvesting, the loss of carbon due to harvesting shall be included in the quantification of project emissions. The maximum number of GHG credits available to projects shall not exceed the long-term average GHG benefit. . |  |  |  |  |  |  |
| **3.3** | **ODS (Ozone-depleting Substances) - Specific Matters** |  |  |  |  |  |  |
| **3.3.4** | Where ODS is recovered from products that have been imported specifically for their disassembly (i.e., the products have not been collected in the host country), do the following have apply:   * + 1. The products shall not originate from any country in which any law, statute or other regulatory framework requires the recovery and destruction of the relevant ODS from such products.  1. The project proponent shall provide documentary evidence, such as shipping manifests, bills of lading and evidence of collection of the products in the originating country, to demonstrate the origin of such products. |  |  |  |  |  |  |
| **3.3.5** | Do documentary evidence provided to verify the origin of all ODS destroyed by the project. Such evidence shall be appropriate to the nature and scale of the project. |  |  |  |  |  |  |
| **3.3.6** | Does the project use a destruction technology that meets the screening criteria for destruction technologies set out in the UNEP April 2002 Report of the Technology and Economic Assessment Panel (TEAP), Volume 3b, Report of the Task Force on Destruction Technologies |  |  |  |  |  |  |
| **3.3.7** | For concentrated sources, do projects use a destruction technology with a minimum verified DRE of 99.99 percent. |  |  |  |  |  |  |
| **3.3.8** | For dilute sources, do projects use a destruction technology with a minimum verified DRE of 95 percent. In addition, a minimum Recovery and Destruction Efficiency (RDE) of 85 percent shall be achieved. |  |  |  |  |  |  |
| **3.4** | **GCS (Geologic Carbon Storage)-Specific Matters** |  |  |  |  |  |  |
| **3.4.1** | Do GCS projects follow the requirements set out in the VCS Program document *GCS Requirements.* |  |  |  |  |  |  |
| **3.5** | **Project Documentation** |  |  |  |  |  |  |
| **3.5.3** | Does the validation/verification body confirm that any information designated by the project proponent as commercially sensitive meets the VCS Program definition of commercially sensitive information. Information in the project description related to the determination of the baseline scenario, demonstration of additionality, and estimation and monitoring of GHG emission reductions and removals shall not be considered to be commercially sensitive and shall be provided in the public versions of the project description. |  |  |  |  |  |  |
| **3.5.7** | Does the monitoring report specify the number of GHG emission reductions or removals generated in each calendar year of the monitoring period. |  |  |  |  |  |  |
| **3.5.8** | Does the monitoring report verify prior to submission to Verra. |  |  |  |  |  |  |
| **3.6** | **Project Design** |  |  |  |  |  |  |
| **3.6.1** | Projects may include multiple project activities where the methodology applied to the project allows more than one project activity and/or where projects apply more than one methodology. |  |  |  |  |  |  |
| **3.6.2** | Where more than one methodology has been applied to a project with multiple project activities, do the following applies:   1. Each project activity shall be specified separately in the project description, referencing the relevant methodology. 2. All criteria and procedures set out in the applied methodologies in relation to applicability conditions, demonstration of additionality, determination of baseline scenario and GHG emission reduction and removal quantification shall be applied separately to each project activity, noting the following: 3. A single set of criteria and procedures for the demonstration of additionality may be applied where the applied methodologies reference the same additionality tool and/or procedures, and where separate demonstration of additionality for each project activity is not practicable. 4. The criteria and procedures for identifying the baseline scenario may be combined where the relevant methodologies or the referenced additionality tool and/or procedures specify criteria and procedures for combining baseline scenarios. 5. The criteria and procedures relating to all other aspects of the methodologies may be combined.   Where AFOLU projects are required to undertake non-permanence risk assessment and buffer withholding determination, this shall be done separately for each project activity. |  |  |  |  |  |  |
| **3.6.3** | Do AFOLU projects that include multiple project activities conform with the respective project requirements of each included AFOLU category. |  |  |  |  |  |  |
| **3.6.5** | Does inclusion of further project activity instances subsequent to initial validation of a non-grouped project is not permitted |  |  |  |  |  |  |
| **3.6.6** | Does the baseline determination and additionality demonstration for all project activity instances in a project combined |  |  |  |  |  |  |
| **3.6.7** | Where a project includes multiple project activity instances from multiple project activities, does the project activity instances from each project activity assessed in accordance with Sections 3.6.1 – 3.6.3. |  |  |  |  |  |  |
| **3.6.8** | Does the project proponent include in a singular project all project activity instances within ten kilometres of another instance of the same project activity and with the same project proponent |  |  |  |
| **3.6.9** | Where a capacity limit applies to a project activity included in the project, no project activity instance shall exceed such limit. Further, no single cluster of project activity instances shall exceed the capacity limit, do they determined as follows:   1. Each project activity instance that exceeds one percent of the capacity limit shall be identified. 2. Such instances shall be divided into clusters, whereby each cluster is comprised any system of such instances such that each instance is within one kilometre of at least one other instance in the cluster. Instances that are not within one kilometre of any other instance shall not be assigned to clusters.   None of the clusters shall exceed the capacity limit and no further project activity instances shall be added to the project that would cause any of the clusters to exceed the capacity limit. |  |  |  |
| **3.6.10** | Do grouped projects specify one or more clearly defined geographic areas within which project activity instances may be developed. Such geographic areas shall be specified using geodetic polygons as set out in Section 3.11. Geographic areas with no initial project activity instances shall not be included in the project unless it can be demonstrated that the same (or at least as conservative) baseline scenario and rationale for the demonstration of additionality is applicable to such an area as a geographic area that does include initial project activity instances. |  |  |  |
| **3.6.11** | The initial project activity instances are those that are included in the project description at validation and do project description include all project activity instances currently implemented on the issue date of the project description. |  |  |  |
| **3.6.12** | Grouped projects may incorporate multiple project activities. Where a grouped project includes multiple project activities, does the project description l designate which project activities may occur in each geographic area. |  |  |  |
| **3.6.13** | Does the baseline scenario for a project activity determined for each designated geographic area, in accordance with the methodology applied to the project. Where a single baseline scenario cannot be determined for a project activity over the entirety of a geographic area, the geographic area shall be redefined or divided such that a single baseline scenario can be determined for the revised geographic area or areas. |  |  |  |
| **3.6.14** | Does the additionality of the initial project activity instances demonstrated for each designated geographic area, in accordance with the methodology applied to the project. Where the additionality of the initial project activity instances within a particular geographic area cannot be demonstrated for the entirety of that geographic area, the geographic area shall be redefined or divided such that the additionality of the instances occurring in the revised geographic area or areas can be demonstrated. |  |  |  |
| **3.6.15** | Where factors relevant to the determination of the baseline scenario or demonstration of additionality require assessment across a given area, the area, at a minimum, the grouped project geographic area. Examples of such factors include, inter alia, common practice; laws, statutes, regulatory frameworks, or policies relevant to demonstration of regulatory surplus; determination of regional grid emission factors; and historical deforestation and degradation rates. |  |  |  |
| **3.6.16** | Do grouped projects include one or more sets of eligibility criteria for the inclusion of new project activity instances. At least one set of eligibility criteria for the inclusion of new project activity instances shall be provided for each combination of project activity and geographic area specified in the project description. Where grouped projects include multiple baseline scenarios or demonstrations of additionality, such projects will require at least one set of eligibility criteria for each combination of baseline scenario and demonstration of additionality specified in the project description. A set of eligibility criteria shall ensure that new project activity instances:   1. Meet the applicability conditions set out in the methodology applied to the project. 2. Use the technologies or measures specified in the project description. 3. Apply the technologies or measures in the same manner as specified in the project description. 4. Are subject to the baseline scenario determined in the project description for the specified project activity and geographic area.   Have characteristics with respect to additionality that are consistent with the initial instances for the specified project activity and geographic area. |  |  |  |
| **3.6.17** | Grouped projects provide for the inclusion of new project activity instances subsequent to the initial validation of the project. Do new project activity instances:   1. Occur within one of the designated geographic areas specified in the project description. 2. Conform with at least one complete set of eligibility criteria for the inclusion of new project activity instances. Partial conformance with multiple sets of eligibility criteria is insufficient. 3. Be included in the monitoring report with sufficient technical, financial, geographic, and other relevant information to demonstrate conformance with the applicable set of eligibility criteria and enable evidence gathering by the validation/verification body. 4. Be included in an updated project description, with updated project location information, which shall be validated at the time of verification against the applicable set of eligibility criteria. 5. Have evidence of project ownership, in respect of each project activity instance, held by the project proponent from the respective start date of each project activity instance. 6. Have a start date that is the same as or later than the grouped project start date. 7. Be eligible for crediting from the start date of the project activity instance through to the end of the project crediting period (only). 8. Only eligible for crediting from the start of the verification period in which they were added to the grouped project. 9. Not be or have been enrolled in another VCS project. 10. Adhere to the clustering and capacity limit requirements for multiple project activity instances set out in 3.6.8 - 3.6.9. |  |  |  |
| **3.6.18** | Where inclusion of a new project activity instance necessitates the addition of a new project proponent to the project, do such instances included in the grouped project description within two years of the project activity instance start date or, where the project activity is an AFOLU activity, within five years of the project activity instance start date |  |  |  |
| **3.6.19** | AFOLU non-permanence risk analyses, where required, assessed for each geographic area specified in the project description (for requirements related to geographic areas of grouped projects see the VCS Standard). Where risks are relevant to only a portion of each geographic area, does the geographic area further divided such that a single total risk rating can be determined for each geographic area. Where a project is divided into more than one geographic area for the purpose of risk analysis, do the project’s monitoring and verification reports list the total risk rating for each area and the corresponding net change in the project’s carbon stocks in the same area. The risk rating for each area applies only to the GHG emissions reductions generated by project activity instances within the area. |  |  |  |
| **3.6.20** | Activity-shifting, market leakage and ecological leakage assessments, where required, do assessments undertaken as set out in Section 3.15.5 – 3.15.15, and the methodology applied, on the initial group of instances of each project activity and reassessed where new instances of the project activity are included in the project. |  |  |  |
| **3.6.22** | A grouped project shall be described in a single project description, do the project contain the following:   * 1. A delineation of the geographic area(s) within which all project activity instances shall occur. Such area(s) shall be specified by geodetic polygons as set out in Section 3.11 below.  1. One or more determinations of the baseline for the project activity in accordance with the requirements of the methodology applied to the project. 2. One or more demonstrations of additionality for the project activity in accordance with the requirements of the methodology applied to the project. 3. One or more sets of eligibility criteria for the inclusion of new project activity instances at subsequent verification events. 4. A description of the central GHG information system and controls associated with the project and its monitoring. |  |  |  |
| **3.7** | **Ownership** |  |  |  |
| **3.7.1** | Do the project description accompanied by one or more of the following types of evidence establishing project ownership accorded to the project proponent(s), or program ownership accorded to the jurisdictional proponent(s), as the case may be. To aid the readability of this section, the term project ownership is used below, but should be substituted by the term program ownership, as appropriate:   * 1. Project ownership arising or granted under statute, regulation, or decree by a competent authority.   2. Project ownership arising under law.   3. Project ownership arising by virtue of a statutory, property or contractual right in the plant, equipment or process that generates GHG emission reductions and/or removals.   4. Project ownership arising by virtue of a statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions and/or removals.   5. An enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the plant, equipment or process that generates GHG emission reductions and/or removals which vests project ownership in the project proponent.   6. An enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions or removals which vests project ownership in the project proponent.   Project ownership arising from the implementation5 or enforcement of laws, statutes or regulatory frameworks that require activities be undertaken or incentivize activities that generate GHG emission reductions or removals. |  |  |  |
| **3.8** | **Project Start Date** |  |  |  |
| **3.8.1** | Does Non-AFOLU projects complete validation within two years of the project start date. Additional time is granted for non-AFOLU projects to complete validation where they are applying a new VCS methodology. Specifically, projects using a new VCS methodology and  completing validation within two years of the approval of the methodology by Verra may complete validation within four years of the project start date. |  |  |  |
| **3.8.3** | Do AFOLU projects initiate the pipeline listing process within three years of the project start date. |  |  |  |
| **3.8.4** | All AFOLU projects with ex-ante emission reduction/removal estimates of 20,000 tCO2e per year or less, and ARR, RWE and IFM projects of any size shall complete validation within eight years of the project start date. |  |  |  |  |  |  |
| **3.8.5** | Do all other AFOLU projects complete validation within five years of the project start date. |  |  |  |  |  |  |
| **3.8.6** | Do ODS projects conform with at least one of the following in relation to project start date:   * 1. The project start date shall not be before the Montreal Protocol production phase-out deadline (except for critical/essential uses) for the relevant ODS as it applies to the host country and/or any country from which ODS destroyed by the project is imported (as applicable); or   2. The project start date shall not be before the date the host country and/or any country from which ODS destroyed by the project is imported (as applicable) implements the production phase-out, or consumption phase-out where such country does not produce the relevant ODS, of the relevant ODS (critical/essential uses exempted). Such phase-outs shall be implemented in combination with an import ban on the relevant ODS (critical/essential uses exempted). This project start date requirement accounts for countries that phase-out the relevant ODS in advance of their Montreal Protocol production phase-out deadline. |  |  |  |  |  |  |
| **3.8.7** | Where the project imports ODS, does it provide documentary evidence, such as shipping manifests and bills of lading, to demonstrate that the ODS originates from a country meeting with the above. |  |  |  |  |  |  |
| **3.8.8** | Notwithstanding the requirements set out in Sections 3.8.1 – 3.8.7 above, projects applying a standardized method for determining additionality shall initiate the project pipeline listing process set out in the VCS Program document *Registration and Issuance Process* within the project validation timelines set out above. Validation may be completed at any time up to concurrent with the first verification. |  |  |  |  |  |  |
| **3.8.9** | For projects registered under an approved GHG program which are seeking registration with the VCS Program, further specification with respect to the validation deadline is set out in Sections 3.22.6 through 3.22.10. |  |  |  |  |  |  |
| **3.9** | **Project Crediting Period** |  |  |  |  |  |  |
| **3.9.1** | The project crediting period shall be either seven years (twice renewable for a total of up to 21 years) or ten years fixed, except for AFOLU and GCS projects. |  |  |  |  |  |  |
| **3.9.2** | For ALM projects focusing exclusively on reducing N2O, CH4 and/or fossil-derived CO2 emissions, the project crediting period shall be either seven years (twice renewable for a total of 21 years) or ten years fixed. |  |  |  |  |  |  |
| **3.9.3** | For all AFOLU projects other than such ALM projects described in 3.9.2, the project crediting period shall be a minimum of 20 years up to a maximum of 100 years, which may be renewed at most four times, with a total project crediting period not to exceed 100 years. |  |  |  |  |  |  |
| **3.9.4** | AFOLU projects shall have a credible and robust plan for managing and implementing the project over the project crediting period. |  |  |  |  |  |  |
| **3.9.5** | For ARR or IFM extension of rotation age or low-productive to high-productive projects with harvesting, the length of the project crediting period shall be set to include at least one complete harvest/cutting cycle. In the case of selectively cut IFM projects, where trees are individually selected for harvest, the harvest/cutting cycle is the allowable re-entry period into the harvest area as determined by legal and regulatory requirements, and/or common practice. |  |  |  |  |  |  |
| **3.9.7** | Projects registered under other GHG programs are not eligible for VCU issuance beyond the end of the total project crediting period under those programs. |  |  |  |  |  |  |
| **3.9.8** | The following applies with respect to the renewal of the project crediting period under the VCS Program:   * 1. A full reassessment of additionality is not required when renewing the project crediting period unless otherwise specified in the methodology. However, regulatory surplus shall be demonstrated in accordance with the requirements set out in the VCS Program rules and the project description shall be updated accordingly.   2. The validity of the original baseline scenario shall be demonstrated, or where invalid, a new baseline scenario shall be determined when renewing the project crediting period as follows:  1. The validity of the original baseline scenario shall be assessed. Such assessment shall include an evaluation of the impact of new relevant national and/or sectoral policies and circumstances on the validity of the baseline scenario. 2. Where it is determined that the original baseline scenario is still valid, the GHG emissions associated with the original baseline scenario shall be reassessed using the latest version of the *CDM Tool to assess the validity of the original/current baseline and to update the baseline at the renewal of a crediting period*. 3. Where it is determined that the original baseline scenario is no longer valid, the current baseline scenario shall be established in accordance with the VCS Program rules.    1. The project description, containing updated information with respect to the baseline, the estimated GHG emission reductions or removals and the monitoring plan, shall be submitted for validation. Such updates shall be based upon the latest approved version of the methodology or its replacement. Where the project does not meet the requirements of the latest approved version of the methodology or its replacement, the project proponent shall select another applicable approved methodology (which may be a new methodology or methodology revision it has had approved via the methodology development and review process), or shall apply a methodology deviation (where a methodology deviation is appropriate). Failing this, the project shall not be eligible for renewal of its project crediting period.    2. The updated project description shall be validated in accordance with the VCS Program rules. In addition, the project shall be validated against the (current) scope of the VCS. Such validation report shall be issued after the end of the (previous) project crediting period but within two years after the end of the (previous) project crediting period. Additional time is granted for projects to complete such validation where they are switching to a new VCS methodology (*new VCS methodology* in this context has the same meaning as set out in Section 3.8.1) when renewing the project crediting period. Specifically, projects switching to a new VCS methodology and completing such validation within one year of the approval of the methodology by Verra may complete such validation within three years of the end of the (previous) project crediting period. Where a project crediting period is not renewed within these timelines the project crediting period shall end and the project shall be ineligible for further crediting.    3. The issuance date of the validation report shall not be more than one year prior to the end of the current crediting period. |  |  |  |  |  |  |
| **3.10** | **Project Scale** |  |  |  |  |  |  |
| **3.10.1** | Project size categorizations are as follows:   1. *Projects*: Less than or equal to 300,000 tonnes of CO2e per year. 2. *Large projects*: Greater than 300,000 tonnes of CO2e per year. |  |  |  |  |  |  |
| **3.10.2** | Materiality requirements for validation and verification differ according to project size, as set out in Section 4.1.8 below. |  |  |  |  |  |  |
| **3.10.3** | Where applying a methodology with scale and/or capacity limits, does it demonstrated that the project is not a fragmented part of a larger project or activity that would otherwise exceed such limits. Does the project considered a fragmented part of a larger project if within one kilometre of the project boundary there exists another project where:   * 1. The project proponents for both projects are the same.   2. The sectoral scope and project activity for both projects are the same.   3. The other project has been registered under the VCS Program or another GHG program within the previous two years. |  |  |  |  |  |  |
| **3.11** | **Project Location** |  |  |  |  |  |  |
| **3.11.1** | Does the project location specified in the project description as follows:   * 1. Project location for non-AFOLU and non-GCS projects with a single project activity instance shall be specified by a single geodetic coordinate.   2. Where there are multiple project activity instances, project location shall be specified according to the following:  1. A geodetic coordinate shall be provided for each instance and provided in a KML file; or 2. Where there are a large number of project activity instances (e.g., cookstoves or energy efficient light bulbs), at least one geodetic coordinate shall be provided, together with geodetic polygons to delineate the project’s geographic area or areas provided in a KML file, and sufficient additional geographic information (with respect to the location of the instances) to enable evidence gathering by the validation/verification body. 3. Project location for grouped projects shall be specified using geodetic polygons to delineate the project’s geographic area or areas provided in a KML file, together with sufficient additional geographic information to enable evidence gathering by the validation/verification body. |  |  |  |  |  |  |
| **3.11.2** | Does the spatial extent of the project clearly specified to facilitate accurate monitoring, reporting and verification of GHG emission reductions and removals and to demonstrate that the project meets the eligibility criteria of the relevant project category. The description of the project location shall include the following information:   1. Name of the project area (e.g., compartment number, allotment number and local name). 2. Maps of the project zone. 3. A KML file with geodetic polygons that precisely delineates the project zone of the AFOLU project where net emission reductions and removals occur, in accordance with the following: 4. Where the project zone is comprised of multiple polygons (parcels), the project location details of each polygon/parcel shall be included in the project description. 5. Grouped projects and non-grouped projects with multiple project activity instances shall provide geodetic polygons showing the boundary of each instance included in the project. Non-contiguous project activity instances shall be reflected in the polygons in the KML file. 6. KML files shall exclude at the project start: 7. Any non-eligible areas (e.g., if a project activity relates to improved crop management, the KML file should only be for the participating croplands and should exclude any surrounding land that may be part of the property), and 8. Areas not part of the project area, as defined by the applied methodology (e.g., roads, water bodies, water ways, settlements). 9. Total size of the project zone. 10. Details of ownership. |  |  |  |  |  |  |
| **3.11.3** | The project area shall not overlap with the project area of another VCS AFOLU project. |  |  |  |  |  |  |
| **3.11.4** | Does the project proponent demonstrate control over the entire project area with documentary evidence establishing project ownership, noting the following:   * 1. For non-grouped projects, the entire project area shall be under the control of the project proponent at the time of validation or shall come to be under the control of the project proponent by the first verification event.   2. Where the project proponent does not yet have control over the entire area at validation, the entire project area (that shall be specified in accordance with Section 3.11.2) is to be validated as if it were under control and the project is ready to be implemented.   3. Where less than 80 percent of the total proposed area of the project is under current control at validation, the following applies:  1. It shall be demonstrated that the result of the additionality test is applicable to the project area at the time of validation and to the entire project area to come under control in the future. 2. The monitoring plan shall be designed such that it is flexible enough to deal with changes in the size of the project. 3. The project shall be verified within five years of validation. At verification, the size of the project becomes fixed.    1. Where the area fixed at verification is smaller than intended at validation, areas that at verification have not come under control of the project shall be considered in the leakage management, mitigation, and accounting. This requires the selection, at validation, of a methodology with appropriate leakage methods that may be used in the event the entire area does not come under control of the project.    2. WRC projects located in a coastal zone shall consider the impact of expected sea level rise on wetland migration (e.g., the potential for landward expansion of the wetland area) when establishing the project area. Where it is not possible to include the entire area expected to be impacted by landward expansion of the wetland area at validation, coastal WRC projects may add land to the project area after the first verification to accommodate wetland migration due to sea level rise, following the requirements for a project description deviation as set out in Section 3.20. |  |  |  |  |  |  |
| **3.11.5** | Do WRC projects demonstrate that:   * 1. There is no hydrological connectivity to adjacent (non-project) areas; or   2. It is not possible for hydrologically connected areas to have a negative impact on the hydrology within the project area that could cause a significant increase in GHG emissions; or   3. Where projects are hydrologically connected to adjacent areas that may have a negative impact on the hydrology within the project area, projects shall demonstrate that such impacts will not result in a significant increase in GHG emissions, as follows:  1. Peatland projects shall establish a WRC buffer zone to ensure that potential negative impacts to the hydrology in the project area, such as causing the water table in the project area to drop or otherwise negatively impacting the hydrology, are mitigated. The WRC buffer zone may be inside or outside the geographic boundary of the project area. Where it is outside of the project area, the WRC buffer zone shall be adjacent to the project geographic boundary and binding water management agreements with land holders in the WRC buffer zone shall be in place by the time of the first verification. WRC buffer zones shall not overlap with another project’s area. The size and shape of the WRC buffer zone shall be sufficient to avoid such negative impacts on the project area, which may be demonstrated through peer reviewed literature or expert judgment. 2. All other wetland projects shall establish a WRC buffer zone as set out in Section 3.11.5(3)(a) above, or implement project activities or establish a mitigation plan to ensure that impacts to the hydrology (e.g., interrupted water or sediment supply) do not result in a significant increase in GHG emissions. Emphasis shall be placed on hydrological connectivity that is immediately adjacent to the project area. Coastal wetlands shall consider hydrological connectivity originating from adjacent lands and shall follow the applied methodology with respect to oceanic impacts. WRC buffer zones shall not overlap with another project’s area. Where a project activity to mitigate impacts from hydrological connectivity causes an increase in GHG emissions in the project area or WRC buffer zone, such emissions shall be included in GHG accounting where above *de minimis.* |  |  |  |  |  |  |
| **3.12** | **Project Boundary** |  |  |  |  |  |  |
| **3.12.1** | Does the project boundary described (using diagrams, as required) and GHG sources, sinks, and reservoirs identified and assessed in accordance with the methodology applied to the project. The project shall justify not selecting any relevant GHG source, sink, and reservoir. |  |  |  |  |  |  |
| **3.13** | **Baseline Scenario** |  |  |  |  |  |  |
| **3.13.1** | Does the baseline scenario for the project determined in accordance with the requirements set out in the methodology applied to the project, and the choice of baseline scenario shall be justified. |  |  |  |  |  |  |
| **3.13.2** | Do equivalence in type and level of activity of products or services provided by the project and the baseline scenario demonstrated and, where appropriate, any significant differences between the project and the baseline scenario shall be explained. |  |  |  |  |  |  |
| **3.13.3** | Does in the developing the baseline scenario, assumptions, values, and procedures selected that help ensure that net GHG emission reductions and removals are not overestimated. |  |  |  |  |  |  |
| **3.14** | **Additionality** |  |  |  |  |  |  |
| **3.14.2** | Does the project demonstrate regulatory surplus at validation and each project crediting period renewal. Regulatory surplus means that project activities are not mandated by any law, statute, or other regulatory framework, or for UNFCCC non-Annex I countries, any systematically enforced law, statute, or other regulatory framework. |  |  |  |  |  |  |
| **3.14.2** | Does additionality demonstrated and assessed in accordance with the requirements set out in the methodology applied to the project, noting the following exceptions:   1. Where a VCS module using an activity method (see the *VCS Methodology Requirements* for further information on activity methods) is applicable to the project, additionality may be demonstrated using the module in substitution of the additionality requirements set out in the methodology. 2. Where the applied methodology was developed under an approved GHG program and uses an activity method or other simplified procedure for demonstrating additionality, the project proponent shall demonstrate to the validation/verification body that the simplified procedure is appropriate to apply to the project considering the project characteristics, including the context in which the project activity takes place. Failing this demonstration, the project proponent shall not use the simplified procedure for demonstrating additionality and shall instead use an appropriate additionality assessment method in substitution. |  |  |  |  |  |  |
| **3.14.3** | Does the project mandated by any law, statute or other regulatory framework applying in the host country that was implemented on or before 11 November 2001, or the compliance rate of any such law, statute, or other regulatory framework during (part of) the project crediting period shall be below 50 percent. |  |  |  |  |  |  |
| **3.15** | **Quantification of GHG Emission Reductions and Removals** |  |  |  |  |  |  |
| **3.15.1** | Does GHG emission and/or removals estimated for each GHG source, sink, and/or reservoir relevant for the project (including leakage) and the baseline scenarios. |  |  |  |  |  |  |
| **3.15.2** | Does the net GHG emission reductions and removals generated by the project quantified. |  |  |  |  |  |  |
| **3.15.3** | Does Metric tonnes used as the unit of measure and the quantity of each type of GHG shall be converted to tonnes of CO2 equivalent (CO2e). |  |  |  |  |  |  |
| **3.15.4** | Do all GHG emission reductions and removals converted to CO2e using 100-year global warming potential (GWP) values. |  |  |  |  |  |  |
| **3.15.5** | Does the potential for leakage identified for AFOLU projects, and projects are encouraged to include leakage management zones as part of the overall project design. Leakage management zones can minimize the displacement of land use activities to areas outside the project area by maintaining the production of goods and services, such as agricultural products, within areas under the control of the project proponent or by addressing the socioeconomic factors that drive land use change. Activities to mitigate ecological leakage in WRC projects may include the establishment of a leakage management zone inside the project boundary. |  |  |  |  |  |  |
| **3.15.17** | Where projects are required to account for leakage, does such leakage evaluation shall be documented in the appropriate section of the project description and/or monitoring report, as applicable. |  |  |  |  |  |  |
| **3.15.8** | Does market leakage assessments occur in accordance with the requirements set out in the applied methodology(s) at validation and verification. |  |  |  |  |  |  |
| **3.15.11** | Projects shall not account for positive leakage (i.e., where GHG emissions decrease, or removals increase, outside the project area due to project activities). Does the project include positive leakage? |  |  |  |  |  |  |
| **3.15.14** | Projects shall monitor and calculate leakage, in accordance with the applied methodology, for all ex-post accounting (i.e., at each verification), and leakage shall be deducted from the total GHG emission reductions and/or removals of the project. Any leakage shall be subtracted from the number of GHG emission reductions and removals eligible to be issued as VCUs. |  |  |  |  |  |  |
| **3.15.15** | The number of GHG credits issued to projects is determined by subtracting out the buffer credits from the net GHG emission reductions or removals (including leakage) associated with the project. The buffer credits are calculated by multiplying the non-permanence risk rating (as determined by the *AFOLU Non-Permanence Risk Tool*) times the change in carbon stocks only. The full rules and procedures with respect to assignment of buffer credits are set out in the VCS Program document *Registration and Issuance Process*. Does project follow the same procedure. |  |  |  |  |  |  |
| **3.16** | **Monitoring** |  |  |  |  |  |  |
| 3.16.1 | Do data and parameters used for the quantification of GHG emission reductions and/or removals provided in accordance with the methodology. |  |  |  |  |  |  |
| 3.16.2 | Do quality management procedures to manage data and information applied and established. Where applicable, procedures to account for uncertainty in data and parameters shall be applied in accordance with the requirements set out in the methodology. |  |  |  |  |  |  |
| 3.16.3 | Does the project proponent establish a GHG information system for obtaining, recording, compiling, and analysing data and information important for quantifying and reporting GHG emissions and/or removals relevant for the project (including leakage) and baseline scenario? |  |  |  |  |  |  |
| 3.16.4 | Does monitoring plan for the project that includes roles and responsibilities established. |  |  |  |  |  |  |
| 3.16.5 | Where measurement and monitoring equipment is used, does the project proponent ensure the equipment is calibrated according to the equipment’s specifications and/or relevant national or international standards. |  |  |  |
| **3.17** | **Sustainable Development Contributions** |  |  |  |
| 3.17.1 | Does the project proponent demonstrate how the project activities, or additional activities implemented by the project proponent, contribute to sustainable development, as defined by, and tracked against the United Nations Sustainable Development Goals (SDGs). The project proponent shall demonstrate that a project contributes to at least three SDGs by the end of the first monitoring period, and in each subsequent monitoring period. |  |  |  |
| **3.18** | **Safeguards** |  |  |  |
| 3.18.2 | Does the project proponent identify potential negative environmental and socio-economic impacts and shall take steps to mitigate them. Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission reductions or  removals |  |  |  |
| 3.18.3 | Does the project proponent conduct a local stakeholder consultation prior to validation as a way to inform the design of the project and maximize participation from stakeholders. Such consultations allow stakeholders to evaluate impacts, raise concerns about potential negative impacts, and provide input on the project design. |  |  |  |
| 3.18.4 | Does the project proponent establish mechanisms for ongoing communication with local stakeholders to allow stakeholders to raise concerns about potential negative impacts during project implementation. |  |  |  |
| 3.18.5 | Does the project proponent take due account of all and any input received during the local stakeholder consultation and through ongoing communications, which means it will need to either update the project design or justify why updates are not appropriate. The project proponent shall demonstrate to the validation/verification body what action it has taken in respect of the local stakeholder consultation as part of validation, and in respect of ongoing communications as part of each subsequent verification. |  |  |  |
| 3.18.7 | Do projects remain on the project pipeline for the entirety of their 30-day public comment period. |  |  |  |
| 3.18.10 | The Validation/Verification body shall not finalize validation until their 30-day public comment period has ended and the project proponent’s responses evaluated. |  |  |  |
| 3.18.11 | Where AFOLU project activities do not impact local stakeholders, projects are not required to meet the requirements set out in Sections 3.18.12 – 3.18.20 below. The project proponent shall provide evidence that project activities do not impact local stakeholders at validation and each verification. Does the project proponent follow this procedure? |  |  |  |
| 3.18.12 | Does the project proponent conduct a thorough assessment of the local stakeholders that will be impacted by the project. The project description shall include information on local stakeholders at the start of the project, including:   * 1. The process(es) used to identify local stakeholders likely impacted by the project and a list of such stakeholders;   2. Identification of any legal or customary tenure/access rights to territories and resources, including collective and/or conflicting rights, held by local stakeholders;   3. A description of the social, economic and cultural diversity within local stakeholder groups and the differences and interactions between the stakeholder groups;   4. Any significant changes in the makeup of local stakeholders over time;   5. The expected changes in well-being and other stakeholder characteristics under the baseline scenario, including changes to ecosystem services identified as important to local stakeholders;   6. The location of communities, local stakeholders and areas outside the project area that are predicted to be impacted by the project; and   7. The location of territories and resources which local stakeholders own or to which they have customary access. |  |  |  |
| 3.18.13 | Does the project proponent identify likely natural and human-induced risks to local stakeholder well-being expected during the project lifetime and outline measures needed to mitigate these risks. |  |  |  |
| 3.18.14 | Does the project proponent identify the risks for local stakeholders to participate in the project, including project design and consultation. Risks should include trade-offs with food security, land loss, loss of yields and climate change adaptation. The project shall be designed and implemented to avoid trade-offs and manage the identified risks to local stakeholders. |  |  |  |
| 3.18.15 | The project proponent or any other entity involved in project design or implementation shall not be involved in any form of discrimination or sexual harassment. |  |  |  |
| 3.18.16 | The management teams involved in the project shall have expertise and prior experience implementing land management and carbon projects with community engagement at the project scale. Where relevant experience is lacking, does the project proponent either demonstrate how they have partnered with other organizations to support the project or have a recruitment strategy to fill the identified gaps. |  |  |  |
| 3.18.17 | Does the project proponent avoid negative impacts of project implementation and mitigate impacts when unavoidable, including the following:   * 1. The project proponent shall recognize, respect, and support local stakeholders’ property rights and where feasible, take measures to help secure rights. The project shall not encroach on private, stakeholder or government property or relocate people off their lands without consent. The project may affect property rights if free, prior, and informed consent is obtained from those concerned and a transparent agreement is reached that includes provisions for just and fair compensation. In the event there are any ongoing or unresolved conflicts over property rights, usage or resources, the project shall undertake no activity that could exacerbate the conflict or influence the outcome of an unresolved dispute.   2. To reduce damage to the ecosystems on which the local stakeholders rely:  1. The project shall not introduce any invasive species or allow an invasive species to thrive through project implementation. 2. The project shall justify the use of non-native species over native species, explaining the possible adverse effects of non-native species. 3. The project shall justify the use of fertilizers, chemical pesticides, biological control agents and other inputs used by the project and their possible adverse effects. |  |  |  |  |  |  |
| 3.18.18 | Does the project proponent take all appropriate measures to communicate and consult with local stakeholders in an ongoing process for the life of the project. The project proponent shall communicate:   * 1. The project design and implementation, including the results of monitoring.   2. The risks, costs and benefits the project may bring to local stakeholders.   3. All relevant laws and regulations covering workers’ rights in the host country.   The process of VCS Program validation and verification and the validation/verification body’s site visit. |  |  |  | **Yes as risk client to identified and vvb was addressed the risk** |  |  |
| 3.18.19 | Does the project proponent develop a grievance redress procedure to address disputes with local stakeholders that may arise during project planning and implementation, including with regard to benefit sharing. The procedure shall include processes for receiving, hearing, responding and attempting to resolve grievances within a reasonable time period, taking into account culturally-appropriate conflict resolution methods. The procedure and documentation of disputes resolved through the procedure shall be made publicly available. The procedure shall have three stages:   * 1. The project proponent shall attempt to amicably resolve all grievances and provide a written response to the grievances in a manner that is culturally appropriate.   2. Any grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.   3. Any grievances that are not resolved through mediation shall be referred either to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party’s ability to submit the grievance to a competent supranational adjudicatory body, if any. |  |  |  |  |  |  |
| 3.18.20 | Do All communication and consultation performed in a culturally appropriate manner, including language and gender sensitivity, directly with local stakeholders or their legitimate representatives when appropriate. The results of implementation shall be provided in a timely manner and consultation shall be performed prior to design decisions or implementation to allow stakeholders adequate time to respond to the proposed design or action. |  |  |  |  |  |  |
| **3.19** | **Methodology Deviations** |  |  |  |  |  |  |
| 3.19.2 | Methodology deviations shall not negatively impact the conservativeness of the quantification of GHG emission reductions or removals, except where they result in increased accuracy of such quantification. Deviations relating to any other part of the methodology shall not be permitted. |  |  |  |  |  |  |
| 3.19.3 | Do methodology deviations permitted at validation or verification and their consequences shall be reported in the validation or verification report, as applicable, and all subsequent verification reports. Methodology deviations are not considered to be precedent setting. |  |  |  |  |  |  |
| **3.20** | **Project Description Deviations** |  |  |  |  |  |  |
| 3.20.2 | Do the procedures for documenting a project description deviation depend on whether the deviation impacts the applicability of the methodology, additionality, or the appropriateness of the baseline scenario. Interpretation of whether the deviation impacts any of these shall be determined consistent with the *CDM Guidelines on assessment of different types of changes* *from the project activity as described in the registered PDD,* mutatis mutandis*.* The procedures are as follows   * 1. Where the deviation impacts the applicability of the methodology, additionality or the appropriateness of the baseline scenario, the deviation shall be described and justified in a revised version of the project description. This shall include a description of when the deviation occurred, the reasons for the deviation and how the deviation impacts the applicability of the methodology, additionality and/or the appropriateness of the baseline scenario.   2. Where the deviation does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario, and the project remains in conformance with the applied methodology, the deviation shall be described and justified in the monitoring report. This shall include a description of when the changes occurred and the reasons for the changes. The deviation shall also be described in all subsequent monitoring reports.   3. Project proponents may apply project description deviations for the purpose of switching to a different methodology, where permitted. Where a project switches to a new methodology or methodology version, the project description shall be updated accordingly.   4. A project may switch to a new version of the existing methodology and update its project description accordingly at any point during the crediting or baseline period. |  |  |  |  |  |  |
| 3.20.4 | Do the deviation assessed by a validation/verification body and the process, findings and conclusions reported in the verification report. The assessment shall determine whether the deviation is appropriately described and justified, and whether the project remains in conformance with the VCS Program rules. The deviation shall also be reported on in all subsequent verification reports. Where the project description is updated, the updates shall be  validated. |  |  |  |  |  |  |
| 3.20.6 | Does the validation/verification body assessing the project description deviation accredited for the validation, recognizing that assessment of project description deviations is a validation activity, as further set out in the VCS Program Guide. |  |  |  |  |  |  |
| **3.22** | **Participation under Other GHG Programs** |  |  |  |  |  |  |
| **3.22.1** | Project proponents shall not seek credit for the same GHG emission reduction or removal under the VCS Program and another GHG program. Projects issuing GHG credits under both the VCS Program and another GHG program shall also conform with the rules and requirements set out in the VCS Program document *Registration and Issuance Process*. |  |  |  |  |  |  |
| 3.22.2 | Do projects registered under other GHG programs are not eligible for VCU issuance beyond the end of the total project crediting period under those programs. |  |  |  |  |  |  |
| 3.22.3 | Do projects registered under another GHG program, with activities that are included within the scope of the VCS Program (see Section 2.1), shall only be eligible to complete a gap validation and/or register under the VCS Program where the conditions set out in Appendix 2 are met. |  |  |  |  |  |  |
| 3.22.4 | Projects shall not alter their design during the gap validation process, except for projects described in Section 3.22.6. |  |  |  |  |  |  |
| 3.22.5 | In addition to the above, AFOLU projects registered under both the VCS Program and another GHG program shall conform with the following:   * 1. All and any (VCS) monitoring and verification reports shall state the total amount of credits (GHG credits and, where applicable, buffer credits) issued under the other GHG program.   2. The project shall prepare a non-permanence risk report in accordance with the VCS Program document AFOLU Non-Permanence Risk Tool and a validation/verification body shall undertake a full validation of same in accordance with the VCS Program rules. The non-permanence risk analysis shall be based upon the project as a whole, though the buffer withholding shall apply to the net change in carbon stocks for which credits are sought under the VCS Program.   3. Where temporary GHG credits (e.g., temporary certified emission reductions (TCERs) or long-term certified emission reductions (LCERs)) have been issued to the project, VCUs may be issued to the project only in accordance with the rules and requirements set out in the VCS Program Document Registration and Issuance Process.   4. Where a loss event or a reversal occurs, the project shall conform with the rules for reporting a loss event and holding/cancelling credits set out in Section 3.2.16 and the VCS Program Document Registration and Issuance Process. Such reporting, holding, and cancelling shall apply to the proportion of credits (GHG credits and buffer credits) granted to date under the VCS Program. |  |  |  |  |  |  |
| 3.22.6 | For projects registered under the CDM:   1. Multiple CPAs registered under the CDM that have the same project proponent, the same project activity, and occur within 10 km of one another shall register under the VCS as a single project. Such projects shall complete a full *VCS Project Description Template*. A validation/verification body shall undertake a validation of the full project description. 2. Multiple CPAs registered under the CDM that have the same project proponent and project activity may register under the VCS as a single project. Such projects shall complete a full *VCS Project Description Template*. A validation/verification body shall undertake a validation of the full project description. 3. Projects or single CPAs registered under the CDM that register under the VCS as a standalone project shall complete the cover page and sections 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, 1.12, 1.13, 1.14, 1.15.1, 1.16, 1.17, 1.18 and 3.6 of the *VCS Project Description Template*. A validation/verification body shall undertake a validation of same, which shall be accompanied by a validation representation, to provide a gap validation for the project’s conformance with the VCS Program rules.   A CPA shall not subdivide into smaller projects or combine subdivided CPAs into one VCS project. |  |  |  |  |  |  |
| 3.22.7 | Projects registered under the JI program shall complete a new *VCS Project Description Template* (applying a methodology eligible under the VCS Program). A validation/verificationbody shall undertake a full validation of same in accordance with the VCS Program rules. Does thevalidation report accompanied by a validation representation. |  |  |  |  |  |  |
| 3.22.8 | Projects registered under the Climate Action Reserve shall complete the cover page and sections 1.1, 1.2, 1.3, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, 1.12, 1.13, 1.15.1, 1.16, 1.17, 1.18, 2.1, 2.2, 2.3, 2.4 and 3.6 of the *VCS Project Description Template*. Does validation/verification body undertake a validation of same, which shall be accompanied by a validation representation, to provide a gap validation for the project’s conformance with VCS Program rules. |  |  |  |  |  |  |
| 3.22.9 | Does the approved GHG program validation (or verification, where the approved GHG program does not have a validation step) or VCS validation completed within the relevant validation deadline as set out in Section 3.8. Validation (or verification) is deemed to have been completed when the validation (or verification) report that is submitted to the relevant program to request registration has been issued. |  |  |  |  |  |  |
| 3.22.10 | Projects registered under a GHG program that is not an approved GHG program may also register with the VCS Program where a validation or verification report has been issued under such program (by an entity approved under the program to issue such reports). For such projects, do the following applies:   * 1. The project start date shall be on or after 19 November 2007.   2. A new VCS Project Description Template shall be completed (using a methodology eligible under the VCS Program) and a validation/verification body shall undertake a full validation of same in accordance with the VCS Program rules. The validation report shall be accompanied by a validation representation.   3. The validation or verification that is submitted to request registration under the other GHG program shall be completed within the relevant validation deadline set out in Section 3.8.Validation or verification is deemed to have been completed when the validation or verification report that is submitted to the other GHG program to request registration has been issued. |  |  |  |  |  |  |
| 3.22.11 | Projects rejected by other GHG programs due to procedural or eligibility requirements can be considered under the VCS Program, but the following conditions shall be met:   * 1. The project description (where the other GHG program has rejected the project before VCS validation) or monitoring report (where the other GHG program has rejected the project after VCS validation) shall clearly state all GHG programs to which the project has applied for registration and the reason(s) for rejection. Such information shall not be deemed as commercially sensitive information.   2. The validation/verification body shall be provided with the rejection document(s), including any additional explanations.   Does the project validated against the VCS Program rules. For projects where the other GHG program has rejected the project after VCS validation, this means a complete revalidation of the project against the VCS Program rules. |  |  |  |  |  |  |
| **3.23** | **Other Forms of Credit and Supply Chain (Scope 3) Emissions** |  |  |  |  |  |  |
| 3.23.1 | Does the project proponent follows the following process. VCUs used in the context of Paris Agreement Article 6 mechanisms and international Paris-related programs such as CORSIA shall meet any and all relevant requirements established under such mechanisms and programs. |  |  |  |  |  |  |
| 3.23.3 | Where projects reduce GHG emissions from activities that are included in an emissions trading program or any other mechanism that includes GHG allowance trading, does evidence provided that the GHG emission reductions or removals generated by the project have not and will not be otherwise counted or used under the program or mechanism.­. |  |  |  |  |  |  |
| 3.23.7 | Where a project’s GHG emission reductions or removals are in a supply chain, and the producer(s) or retailer(s) of the impacted goods or services are involved in the project, does the project proponent require the producer(s) or retailer(s)14 to post a public statement on  their website. |  |  |  |  |  |  |
| 3.23.8 | Where a project’s GHG emission reductions or removals are in a supply chain, and the producer(s) or retailer(s) of the impacted good or service are unknown, not involved in the project or do not have a website, does the project proponent post a public statement on their website. |  |  |  |  |  |  |
| **3.25** | **Records and Information** |  |  |  |  |  |  |
| 3.25.1 | Does the project proponent ensure that all documents and records are kept in a secure and retrievable manner for at least two years after the end of the project crediting period. |  |  |  |  |  |  |
| 3.25.2 | For validation, does the project proponent make available to the validation/verification body the project description, evidence of project ownership and any requested supporting information and data needed to support statements and data in the project description and  evidence of project ownership. |  |  |  |  |  |  |
| 3.25.3 | For verification, does the project proponent make available to the validation/verification body the project description, validation report, monitoring report applicable to the monitoring period and any requested supporting information and data needed to support statements and data in the monitoring report. |  |  |  |  |  |  |
| **VCS Standard** | **Validation and Verification Requirements** |  |  |  |  |  |  |
|  | Validation/verification bodies must assess projects’ conformance with the VCS Program rules and the applied methodology. Validation/verification bodies must be approved under the VCS Program as set out in the VCS Program Guide. |  |  |  |  |  |  |
| **4.1** | **Introduction and General Requirements** |  |  |  |  |  |  |
| 4.1.1 | Validation and verification is a risk-based process and does the process carried out in conformance with ISO 14064-3 and ISO 14065. |  |  |  |  |  |  |
| 4.1.2 | Does the validation/verification body gather evidence to:   1. Validate a project to determine conformance with the VCS Program rules and evaluate the reasonableness of assumptions, limitations, and methods that support a statement about the outcome of future activities, and/or; 2. Verify a statement of historical data and information of a project to a reasonable level of assurance and ensure that the project meets the relevant materiality requirements. |  |  |  |  |  |  |
| 4.1.3 | Does the project validated, and GHG statements of emission reductions or removals verified, by a validation/verification body that meets with the eligibility requirements set out in the VCS Program Guide. |  |  |  |  |  |  |
| 4.1.4 | Validation and verification of the project may be undertaken by the same validation/verification body, noting the rules on rotation of validation/verification bodies set out in Section 4.1.23 of VCS Standard. |  |  |  |  |  |  |
| 4.1.5 | Does the validation/verification body ensure that the project is listed on the project pipeline with a status of under validation before the opening meeting with the project proponent, such opening meeting representing the beginning of the validation process. Further, validation shall not begin until the 30-day public comment period has begun, and the validation/verification body shall not complete validation until after the 30-day public comment period has ended. |  |  |  |  |  |  |
| 4.1.6 | Where the project applies a methodology from an approved GHG program that does not have an independent validation step, does the project validated in accordance with the VCS Program rules. |  |  |  |  |  |  |
| 4.1.7 | Validation/verification bodies are expected to follow the guidance provided in the VCS Validation and Verification Manual when validating or verifying projects and conducting  methodology assessments under the VCS Program. |  |  |  |  |  |  |
| **VCS Standard** | **Validation and Verification Processes** |  |  |  |  |  |  |
| **4.1.8** | In addition to the requirements set out in *ISO 14064-3:2019*, the following shall apply:   1. The level of assurance for verifications shall be reasonable, with respect to material errors, omissions, and misrepresentations. 2. The criteria for validation shall be the *VCS Version 4*, or approved GHG program where the validation is performed under an approved GHG program (as in cases of participation under the VCS Program and an approved GHG program). The criteria for verification shall be the *VCS Version 4* (regardless of the VCS version or GHG program under which the project was validated). This means the validation or verification shall ensure conformance of the project with the VCS Program rules, or rules and requirements of the approved GHG program, as applicable. 3. The objective of validation or verification shall be in conformance with the VCS Program rules and the methodology applied to the project. 4. The threshold for materiality with respect to the aggregate of errors, omissions, and misrepresentations relative to the total reported GHG emission reductions and/or removals shall be five percent for projects and one percent for large projects. |  |  |  |  |  |  |
| **4.1.9** | A site visit that includes a visit to facilities and/or project areas shall be conducted at validation. Does such a site visit conduct at verification under the following circumstances:   1. The first verification of the project after validation; 2. Verification of project baseline reassessments; and   Verifications that assess a project description deviation where the deviation impacts the applicability of the methodology, additionality or the appropriateness of the baseline scenario. |  |  |  |  |  |  |
| **4.1.10** | Where a site visit to facilities and/or project areas is not required under Section 4.1.9, does the validation/verification body identify whether a site visit is needed based on an independent risk assessment. Such risk assessment shall identify the risk of a material misstatement or nonconformity with the audit criteria. Where it is determined that no site visit is required, the validation/verification body shall justify and document the rationale for the decision. |  |  |  |  |  |  |
| **4.1.11** | Does evaluation of the project’s stakeholder engagement done in a culturally appropriate manner, and individual stakeholders and/or stakeholder groups to be interviewed shall be selected by the validation/verification body’s auditor team independently and, to the extent possible, in advance of the site visit. Validation/verification bodies shall plan and conduct interviews in a manner that demonstrates that the stakeholder interviews are free from bias or  influence from the project proponent. |  |  |  |  |  |  |
| **4.1.12** | Where the project does not fully conform with the methodology, the validation/verification body shall determine whether this represents a methodology deviation or a methodology revision (in accordance with the specifications for each), and does the case handled accordingly. |  |  |  |  |  |  |
| **4.1.13** | Where the project applies a revision to an approved GHG program methodology and the version of the (underlying) methodology referenced by the methodology revision is no longer current, the validation/verification body shall determine whether material changes have occurred to the underlying methodology that affect the integrity of the methodology revision. Where such material changes have occurred, the project shall not be approved. |  |  |  |  |  |  |
| **4.1.14** | Where the project does not meet the criteria for validation or verification, does the validation/verification body produce a negative validation opinion and provide the validation or verification report and project description, or monitoring report, to Verra. The project shall be ineligible for registration until such time as corrective action is taken and the same validation/verification body has provided a positive validation or verification. |  |  |  |  |  |  |
| **4.1.15** | **Competence** |  |  |  |  |  |  |
|  | Does the Validation/Verification body and validation and verification team meet the competence requirements set out in ISO 14065. |  |  |  |  |  |  |
| **VCS Standard** | **Validation and Verification Reporting** |  |  |  |  |  |  |
| 4.1.16 | The validation report describes the validation process, any findings raised during validation and their resolution, and the opinion reached by the validation/verification body on the GHG statement in the project design document and/or monitoring report. The validation/verification body shall use the *VCS Validation Report Template,* an approved combined validation report template available on the Verra website, or an approved GHG program validation report template where the project is registered under an approved GHG program, as appropriate, and adhere to all instructional text within the template. Does the validation report accompanied by a validation representation, which shall be prepared using the *VCS Validation Deed of* *Representation Template*. |  |  |  |  |  |  |
| 4.1.17 | The verification report describes the verification process, any findings raised during verification and their resolutions, and the opinion reached by the validation/verification body. Does the validation/verification body use the VCS Verification Report Template, or an approved combined verification report template available on the Verra website, and adhere to all instructional text within the template. The verification report shall be accompanied by a verification representation, which shall be prepared using the VCS Verification Deed of Representation Template. |  |  |  |  |  |  |
| 4.1.18 | Does the verification report specify the number of GHG emission reductions or removals generated in each calendar year of the monitoring period. |  |  |  |  |  |  |
| **VCS Standard** | **Validation and Verification Opinion** |  |  |  |  |  |  |
| 4.1.19 | Does the validation report and the verification report contain a validation opinion and a verification opinion, respectively. |  |  |  |  |  |  |
| 4.1.20 | Does validation and verification opinions:   1. State the date of the opinion. 2. State the name of project; the GHG statement subject to validation or verification, including the date and period it covers, and that the GHG statement is the responsibility of the project proponent(s). 3. Identify the objectives, scope and criteria used to compile and assess the GHG statement. 4. Describe whether the data and information supporting the GHG statement were hypothetical, projected and/or historical in nature. 5. Include the validation/verification body’s conclusion on the GHG statement. Adverse, disclaimed, modified, or qualified opinions shall include a description of the reason(s) for the opinion, placed before the validation/verification body’s conclusion. 6. Describe the verification body’s conclusion including level of assurance. 7. For validation conclusions of the GHG statement of forecast of future emission reductions/removals, the GHG opinion shall explain that actual results may differ from the forecast as the estimate is based on assumptions that may change in the future. 8. International Accreditation Forum accreditation body approved validation/verification body opinions shall include a declaration that the validation and/or verification of the GHG statement was conducted in accordance with ISO 14064-3. The applicable ISO version shall be included (e.g., ISO 14064-3; 2019). 9. For AFOLU projects, state the version number of the non-permanence risk report or market leakage evaluation documentation upon which the opinion is based. |  |  |  |  |  |  |
| 4.1.21 | Do verification opinions state the volume of GHG emission reductions or removals generated during the monitoring period that have been verified. For AFOLU projects, the verification opinion shall also include the non-permanence risk rating, leakage emissions and number of GHG emission reductions or removals eligible to be issued as VCUs. |  |  |  |  |  |  |
| **VCS Standard** | **Records of Validation and Verification** |  |  |  |  |  |  |
| 4.1.22 | Does the validation/verification body keep all documents and records in a secure and retrievable manner for at least two years after the end of the project crediting period, even where they do not conduct verification for the whole project crediting period. |  |  |  |  |  |  |
| **VCS Standard** | **Validation and Verification Requirements for Grouped Projects** |  |  |  |  |  |  |
| 4.1.24 | Do validation and verification of grouped projects assess conformance of the project with the requirements for grouped projects set out in the VCS Program rules. |  |  |  |  |  |  |
| 4.1.25 | Does new project activity instances validated, based on the information reported in the monitoring report, against the applicable set of eligibility criteria. The validation/verification body shall specify which instances meet the eligibility criteria for inclusion in the project. |  |  |  |  |  |  |
| 4.1.26 | Where, due to the number of project activity instances, it is unreasonable to undertake an individual assessment of each initial or new instance, does the validation/verification body document and explain the evidence gathering methods employed for the validation of such instances. Such evidence gathering methods shall be statistically sound. The number of  instances included in the project, eligible for monitoring and generation of VCUs shall be proportional to the percentage of sampled instances found to be in conformance by the validation/verification body. |  |  |  |  |  |  |
| 4.1.27 | Does the verification report for grouped projects document and explain the evidence gathering methods employed by the validation/verification body for the verification of the GHG statement of emission reductions or removals generated by the project. Such methods shall be statistically sound. Any subsequent changes to the evidence gathering method(s) required as a result of the verification findings shall be documented. |  |  |  |  |  |  |
| **VCS Standard** | **Non-Permanence Risk Analysis and Market Leakage Evaluations for AFOLU Projects** |  |  |  |  |  |  |
| 4.1.28 | Does Non-Permanence risk analysis and market leakage evaluations assessed by the validation/verification body in accordance with the VCS Program rules. |  |  |  |  |  |  |
| **4**.1.29 | Does the validation/verification body assess the risk analysis carried out by the project proponent in accordance with the VCS Program documents AFOLU Non-Permanence Risk Tool  and GCS Non-Permanence Risk Tool. The project proponent shall respond to all and any of the validation/verification body’s findings. As a result of any such findings, the project proponent  shall amend the documentation as necessary and update the risk rating accordingly. |  |  |  |  |  |  |

**For internal use only**

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| **Validation/Verification body** |  | **Acc. No.** |
| **Type of Visit** | **Document and Record Review/Pre-Assessment/ Initial Assessment / Surveillance / Re-Assessment** | |
| **Name of the Assessor** |  | |
| **Date** |  | |