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| **CALL FOR INPUT** | |
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Instruction: Enter your input in the table below.

| **Document reference number and title: A6.4-MEP007-A04. Draft Standard: Addressing non-permanence/reversals (version 01.0)** | | | | |
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| **Item** | **Section no.** (as indicated in the document) | **Paragraph/Table/Figure no.** (as indicated in the document) | **Comment** (including justification for change) | **Proposed change**  (including proposed text) |
| 1 | 3.2.1.1.1. | 18 | Paragraph 28 of the Removals Standard is misquoted as including precursors of GHG |  |
| 2 | Appendix 1, Section 2 | 3 (h) | Note that the Removals Standard refers to a ‘post-crediting monitoring period’, not a ‘post-crediting period’. |  |
| 3 | Appendix 1, Section 2 | 3 (j) | Note that according to the Removals Standard the Reversal Risk Assessment Tool (para 38) is intended to ‘identify, assess and mitigate reversal risks’ and calculate the risk rating. That risk rating shall then ‘inform’ the proportion of A6.4ERs to be transferred to the buffer pool account. |  |
| 4 | Appendix 1, Section 6.5 | Equation 8, term *Fbuffer,t* | Ibid., in relation to the bracketed language. |  |
| 5 | Appendix 1, Section 3 | 5, 6 | The ICVCM directly identifies categories of activities where permanence requirements apply, including assessing reversal risk and measures to monitor and address it.  Quote from the ICVCM Assessment Framework:  CRITERION 9.1 CATEGORIES TO WHICH PERMANENCE REQUIREMENTS APPLY  a) The CORSIA requirements relating to permanence shall be met.  b) The following Categories of mitigation activity are considered to have a material risk of reversal. Carbon credits issued for mitigation activities in the Categories below may only be CCP-Approved if all the requirements in criteria 9.2 to 9.5 related to permanence are met:  1) storage and protection of carbon in biogenic reservoirs, including:  i. conservation and avoided conversion (e.g., grassland/rangeland management, avoided deforestation);  ii. agriculture soil carbon sequestration;  iii. forestry sequestration (improved forest management, afforestation/reforestation, agroforestry);  iv. wetland and marine ecosystem restoration/management (including seagrasses, saltmarshes, mangroves, peatlands).  c) The carbon-crediting program shall assess the risk of reversals and where material risk is identified, have appropriate measures to avoid material risks of reversals for the following Categories:  1) mitigation activities involving the displacement of non-renewable biomass;  2) biochar;  3) CCS with geological storage;  4) enhanced weathering;  5) CCS with mineralization;  6) CO2 in concrete utilization. |  |
| 6 | Appendix 1, Section 7.3 | 40-44 | Requirement 9.4 a) 3) of the ICVCM Assessment Framework requires carbon-crediting programs to define and apply clear criteria for determining whether a reversal is avoidable or unavoidable.  Recommendation 1 of the recently published report on the ICVCM Continuous Improvement Work Program on Permanence suggest that the ICVCM include a standard definition of what is classified as avoidable and unavoidable reversals. The recommendation notes that no definition will encompass all possible reversal scenarios and that this definition could change the way pooled buffer reserves are currently managed. Because of this, the CIWP recommends that the ICVCM define the terms in a way that minimises moral hazard and excludes non-credible definitions.  The MEP is invited to access the full report ([link](https://icvcm.org/wp-content/uploads/2025/05/CIWP-Permanence-Report.pdf)). |  |
| 7 | Appendix 1, Section 7.4 |  | Criterion 9.3 of the ICVCM Assessment Framework sets the following requirements for. Monitoring of reversals:  CRITERION 9.3 MONITORING AND COMPENSATION PERIOD  a) The carbon-crediting program shall in relation to Categories listed in criterion 9.1 b) 1) above:  1) require a monitoring and compensation period for such mitigation activities of at least forty years from the start of the first crediting period or to at least the end of the crediting period, whichever is the later;  2) require mitigation activity proponents to monitor and report any reversals for the full monitoring and compensation period and compensate for avoidable reversals;  3) refrain from issuing further carbon credits until avoidable reversals have been compensated;  4) draw upon the pooled buffer reserve if avoidable reversals are not compensated per a) 2) above;  5) treat cessation of monitoring and verification as an avoidable reversal.  Recommendation 1 of the recently published report on the ICVCM Continuous Improvement Work Program on Permanence suggest that the ICVCM should clarify that cessation of monitoring and verification should result in a compensation liability equivalent to the amount of credits that a project previously contributed to a pooled buffer reserve.  Recommendation 5 states that the ICVCM should explore options for extending the 40-year monitoring and compensation period tied to the beginning of the project crediting period in a way that distributes liability amongst other market participants and allows for the use of novel compensation mechanisms.  The options put forward by the CIWP include:   * Transition to issuance-based monitoring and compensation * Permanence fund * Industry-wide pooled buffer reserve * Insurance   These options are further elaborated in the full report ([link](https://icvcm.org/wp-content/uploads/2025/05/CIWP-Permanence-Report.pdf)). |  |
| 8 | Annex 2. Section 1.1. | 2 | Requirement 9.3 a) 2) of the ICVCM Assessment Framework requires that activity proponents monitor and report *reversals* rather that ‘any observed event involving the release of stored greenhouse gases or stored precursors to greenhouse gases for which any [credits]have been issued’. |  |
| 9 | Annex 2. Section 3.2.1. | 40-41 | Recommendation 5 of the recently published report on the ICVCM Continuous Improvement Work Program on Permanence calls upon to  ensure that incentives are in place for project proponents to design their mitigation activities in a way that makes them as durable as feasible.  To that end, the CIWP developed a suite of options for the ICVCM to explore that could increase  the durability of carbon credits deemed to have a “material” risk of reversal:   * Transition to issuance-based monitoring and compensation * Permanence fund * Industry-wide pooled buffer reserve * Insurance   These options are further elaborated in the full report ([link](https://icvcm.org/wp-content/uploads/2025/05/CIWP-Permanence-Report.pdf)). |  |
| 10 | Annex 3. Section 5.2 | 16-21 | See item 5 |  |
| 11 | Annex 3. Section 5.3 | 20 | See item 8 regarding ‘observed events that could potentially lead to a reversal’ |  |

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