

Carbon Market Watch response to Verra's [public consultation](#) on creating a long-term reversal monitoring system

Answers to selected questions

1) Should Verra monitor VCS AFOLU projects for reversals during the post-crediting period? If so, why, if not, why not?

Yes, the current approach of canceling buffer credits at the end of the crediting period is insufficient to guarantee a satisfactory level of permanence and environmental integrity. It assumes that no reversal will occur beyond the share of credits set aside in the buffer pool. This is overly optimistic and not based on robust scientific evidence.

Adopting a different approach that ensures continuous monitoring over the long term to ensure against reversals is therefore welcome.

In addition, Verra should provide guidance to inform buyers that carbon stored in natural reserves is inherently at risk of release, and is unlikely to remain stored for the same number of years as the lifetime of CO₂ in the atmosphere. This essential scientific fact should be more clearly communicated to the buyers of such carbon credits.

2) What would be the key opportunities, benefits, challenges, and risks of Verra doing this?

If done properly, this could improve the credibility of forest credits to some extent. It remains unclear how this method could credibly guarantee compensation over a timescale that matches the lifetime of CO₂ in the atmosphere, as setting up insurance systems to work over multiple centuries lacks practical implementation. This is why Verra should complement this welcome improvement with better communication and notice to buyers informing them of the fact that nature based carbon storage is not equivalent to the safe storage of leaving hydrocarbons in the ground.

4) Would the LTRMS and associated proposed periodic adjustments to the VCS withholding percentages (based on monitored losses by risk category) increase confidence in the long-term resilience of the AFOLU buffer pool and issued project credits?

Yes, it would increase confidence. The adjustments should be frequent, and informed not only by the LTRMS performance, but also by the most up-to-date scientific evidence.

5) Over how long a period should Verra monitor reversals after the project crediting period ends (e.g., 50 years, 100 years)?

Scientifically, reversals should be monitored and compensated for over several centuries in order to even approach equivalence with the release of fossil carbon in the atmosphere.

Monitoring over a period of 300-500 years would be a minimum.

However, this is clearly unrealistic. Therefore, Verra should require monitoring for at least 100 years, in order to be able to guarantee storage over this time period, but should clearly, prominently and publicly communicate that this does not suffice to create an equivalence between biological carbon sinks and fossil carbon emissions. The two cannot be used to offset each other unless and until permanence can be guaranteed credibly and certainly over multiple centuries. There are no systems in place to achieve this level of guarantee today.

6) How frequently should Verra aim to monitor for loss events (e.g., quarterly, bi-annually)?

As frequently as technologically feasible, and not less than bi-annually. If real-time monitoring is available, this should be adopted.

7) If Verra ceases to operate or manage the LTRMS prior to the end of this monitoring commitment how could environmental integrity be maintained (e.g., through cancellation of all buffer credits associated with the project)?

When monitoring ends, all remaining buffer credits should be canceled. This includes the situation of the planned end of monitoring after e.g. 100 years.

It is not credibly feasible for a programme to guarantee the permanence of carbon storage on a timescale that allows for the equivalence with CO₂ in the atmosphere. Verra should communicate this clearly. While improvements to the duration over which storage can be guaranteed are welcome, these will always remain insufficient until they are associated with clear guidance on what removal credits represent, i.e. temporary storage.

10) What else should Verra keep in mind when considering how best to develop and implement a robust and workable LTRMS system?

As mentioned above, Verra should provide clear guidance and information to buyers and the public regarding the clear and scientifically accepted lack of equivalence between carbon stored in natural ecosystems, and carbon stored in unextracted fossil fuel in the ground. It should make it clear that, considered over the full lifetime of CO₂ in the atmosphere, storing a tonne of CO₂e in a natural ecosystem does not contribute to climate change mitigation in a manner that is equivalent to not emitting CO₂ as a result of burning fossil fuels.

Therefore, Verra should clarify that purchasing carbon credits issued from projects that store carbon in natural ecosystems does not allow the buyer to make credible “offsetting” or “compensation” claims. Financing NBS projects is crucial to mitigate climate change, protect ecosystems and promote biodiversity, but it is wholly inappropriate to make “offsetting” or “compensation” claims given the underlying impermanence of such carbon storage and the non-fungibility of biological carbon and fossil carbon.

Should Verra decide not to provide such guidance, we strongly urge you to provide robust scientific evidence in your response to this consultation, to demonstrate the equivalence between fossil and biological carbon stocks, in the way it is discussed above.