Scope 3 Action

Report on public consultation

and road test for VCMI beta Scope 3 Claim

Annex D: Consultation platform comments

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Contents

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The Voluntary Carbon Markets Integrity Initiative (VCMI)

1 Introduction

This annex contains the comments submitted as part of the public consultation for VCMI's beta Scope 3 Claim. Comments are presented alongside either the name or organization of the respondent (if responding on behalf of themselves or their organisation, respectively), where they have not opted to remain anonymous.

We categorized comments by theme and sub-theme, organising feedback around a topic. Some lengthy items were divided across multiple themes. Each comment was analysed for viewpoint or position (i.e. support or opposition to an option).

Comments in this annex are organised by sub-theme.

2 Alignment across standards

Comments (compiled)	Section of the Claim	Respondent name/ organisation
I am aware that VCMI stated that they will "work to identify equivalent target setting frameworks which it deems acceptable for the purposes of making a VCMI Claim" (i.e., defining what counts as science-aligned). Given there is no clarity on this yet, companies presumably have to use SBTi. Given SBTi does not allow use of credits towards the delivery of near- or long-term targets (i.e., where they are used as offsets), the VCMI scope 3 claim presents risks for businesses - both reputational risks but also potentially legal risks.	General	Scarlett Benson
This is clear. Where possible align with (or acknowledge) other reporting frameworks/initiatives for internal abatement, be it SBTi or CSRD	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
We generally agree with this. In general, AFF urges VCMI to coordinate with ICVCM so that there is indeed a supply of high-quality CCP-labeled carbon credits available to the market for VCMI Claims so that companies can begin operationalizing and testing the Claim from the start. A delay in bringing the supply of CCP credits online delays corporate actions on Scope 3 Claims, producing friction in adoption.	Step 3: Meet the required carbon credit use and quality thresholds	American Forest Foundation
The near term targets should be SBTi validated. set and publicly disclose science-aligned near-term emission reduction targets, validated by the SBTi, and publicly commit to reaching net-zero emissions no later than 2050;	General	Mundys
VCMI should clearly require that companies disclose an annual Greenhouse Gas Protocol (GHGP) aligned GHG emissions inventory. "... annual Greenhouse Gas Protocol (GHGP) aligned GHG emissions inventory."	General	The Nature Conservancy
This would depend on where and how companies would be required to disclose their emission gap, how this would affect companies communications related to their targets validated by the Science Based Targets initiative (SBTi), and what is the specific terminology of the Scope 3 Claim that companies can make. None of these details are clearly defined in the VCMI's proposal This would depend on where and how companies would be required to disclose their emission gap', how this would affect companies' communications related to their targets validated by the Science Based Targets initiative (SBTi), and what is the specific terminology of the Scope 3 Claim that companies can make. None of these details are clearly defined in the VCMI's proposal	Step 2: Meet the Scope 3 Claim requirements	NewClimate Institute
If a company does not have a third-party assurance, we would like to suggest a revision that would allow the company to respond in line with the VCMI Claim Code by disclosing the reason why it does not have a third-party assurance. This is because there is a possibility that a company may not be able to make a Scope 3 Claim due to restrictions on third-party assurance.	Step 4: Obtain third-party assurance following the VCMI monitoring,	TOKYO GAS CO.,LTD.

Comments (compiled)	Section of the Claim	Respondent name/ organisation
	reporting & assurance (MRA) framework	
Although SBTi requires companies to disclose actual emission amount for each year, the disclosure of annual target is not necessarily required, so the extent to which the company responds will largely depend on the company's approach. Conversely, if annual target disclosure becomes part of the SBTi requirements, it is likely that more companies will make Scope 3 Claim.	Step 3: Meet the required carbon credit use and quality thresholds	Nomura Research Institute, Ltd. Financial Technology Solution Division

3 Barriers/ challenges toward scope 3 reductions

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Feedback on Step 2: Meet the Scope 3 Claim requirements We agree with the requirements and regulations and we further welcome the public disclosure of existing barriers to scope 3 emissions reduction in order to successfully, and publicly make the claim. However, we would suggest this claim to encompass stronger disclosure requirements as part of its compliance criteria. Furthermore in order to comply with the disclosure requirements, it would be instrumental for VCMI to provide increased guidance and examples of what constitutes acceptable barriers, in order to justify the use of the flexibility claim. For example, we would propose financial disclosure requirements and transparency of how net zero will be reached as the basis for this claim, to enforce (a) that the company will retire credits in accordance with the 'high quality criteria' outlined in this guidance, and possesses the funds to comply with the same (b) the viability of the company addressing emissions through decarbonization measures as a first step, as opposed to complying with this claim via credit use only.	Step 2: Meet the Scope 3 Claim requirements	Anonymous
This enhances accountability for commitments.	Step 2: Meet the Scope 3 Claim requirements	Invert
Why not requiring progress against scope 3 target? Even if not on track or imperfect, progress should be required. Why not requiring progress against scope 3 target? Even if not on track or imperfect, progress should be required.	Step 2: Meet the Scope 3 Claim requirements	Marine Klobut
The mechanism could be improved by recognizing sector-specific challenges. For example, industries like oil and gas, heavy industry, and agriculture face unique Scope 3 emissions challenges due to the nature of their supply chains and product use. Tailoring the guidance or expectations by sector could improve the practicality of the framework and make it more applicable to a broader range of companies.	General	Hatem Ali
Must add tools to help companies get over their challenges to reduce scope 3 emissions.	Step 2: Meet the Scope 3 Claim requirements	Mai Ahmed
How is sufficent described?	Step 2: Meet the Scope 3 Claim requirements	Anonymous

Comments (compiled)	Section of the Claim	Respondent name/ organisation
it should also apply to scope 3 even if not on track. + apply for the Net Zero target as well.	Step 2: Meet the Scope 3 Claim requirements	Marine Klobut
If it is also disclosed where they are in their pathway to meet the scope 3 target. If it can be verified that the actions mentioned are really taking place.	Step 2: Meet the Scope 3 Claim requirements	Marine Klobut
This should be mandatory in case not enough progress is done related to the scope 1 and 2 emissions. In case of no achieving scope 1 and 2 near term goals is realistic no scope 3 claim should be allowed.	Step 2: Meet the Scope 3 Claim requirements	Javier Castro
As written, step 2, does not currently require companies to report their progress towards Scope 3/how much they missed the target by. Surely this is crucial in terms of making the claim. We suggest this is inserted and made clear. At present companies are asked to identify the barriers and what they propose to do about them/when they will overcome them but they don't have to report their actual progress (unless we have missed something) Publicly disclose actions taken to remove scope 3 emission reduction barriers and provide a plan to overcome remaining barriers.' For this requirement we recommend that VCMI tries to ensure that the information required is not too onerous, therefore making this a significant barrier to claiming. A light touch process is recommended, enough to ensure that a company is committed to overcoming the barriers.	Step 2: Meet the Scope 3 Claim requirements	Philip Brady
Recommend you also ask them to provide details of their scope 3 target (e.g., absolute/ intensity, base year, target year, total base year scope 3 emissions covered by the target as a percentage of their total organization-wide base year scope 3 emissions etc). If they report to CDP this will already be transparent so you could consider how to reduce the reporting burden by asking them to upload their CDP response, but not all companies will necessarily answer the relevant information. If you don't ask this then it will be hard to tell just from the absolute or intensity reductions they report the extent to which they're actually progressing. How do you deal with SBTi supplier engagement targets?	Step 2: Meet the Scope 3 Claim requirements	Scarlett Benson
It is good to ask this question and it will be a valuable source of information for the climate community. However, the open text nature of the question might make it hard to analyze. It's also subjective - what is a reasonable barrier? It's also worth highlighting that SBTi doesn't require companies to abate all scope 3 emissions immediately - even the most ambitious scope 3 method (absolute reduction) is only a 2.5% year-on-year reduction (and it might only cover 67% of scope 3	Step 2: Meet the Scope 3 Claim requirements	Scarlett Benson

Comments (compiled)	Section of the Claim	Respondent name/ organisation
emissions so that would mean reducing only 1.7% of total scope 3 emissions). So are you asking them about why they have faced barriers in achieving the 1.7%-2.5% reduction the specific year of the claim or are you asking more broadly about scope 3 emissions overall i.e., what barriers do you anticipate in the next 5 years to achieve the level of scope 3 emissions reductions established within your target? You should clarify this. See comments above. Notably, you should clarify whether you are asking about why they have faced barriers in achieving the 1.7%-2.5% reduction the specific year of the claim or are you asking more broadly about scope 3 emissions overall i.e., what barriers do you anticipate in the next 5 years to achieve the level of scope 3 emissions reductions established within your target?		
It is paramount to enable and incentivise companies to make a claim. Steps 1) and 3) alone would ensure a high degree of integrity or claims and use of carbon credits. We propose that steps 2) and 4) be phased in later years to incentivise more corporate participation now. This would enable early adoption by companies, driving disclosure, positive climate action and gaining experience in the use of carbon credits. VCMI must promote adoption of the claims and support demand for carbon credits. Although we support driving decarbonisation, we firmly support the use of credits and increasing demand for credits as a key pathway to NetZero and beyond. Once a corporate has addressed the emissions gap, the use of credits can be promoted to go beyond the target.	The four steps to making a scope 3 claim	Carbonplace
In Step 2 and related text, there is no explanation for what constitutes a "barrier" nor whether it can be "removed" within the time period of the near term target. We are proposing text changes to introduce more operational realism into the Scope 3 Claim process. Describe operational actions taken and investments made to remove or reduce barriers and plans to further reduce barriers within the time period of the near term target boundary	Step 2: Meet the Scope 3 Claim requirements	Institute for Agriculture and Trade Policy
stressing the importance of the requirements in step 2 to disclose everything openly.	The four steps to making a scope 3 claim	ClimatePartner
Step 2: Meet the Scope 3 Claim requirements Publicly disclose the barrier(s) faced in reducing Scope 3 emissions: it is important to bear in mind that the greatest barrier to reducing Scope 3 emissions lies in the fact that these emissions are not administered or managed by the company making the disclosure. In other words, the company disclosing the information is directly responsible for managing and reducing emissions in its Scopes 1 and 2 but cannot directly control the Scope 1 and 2 emissions of the companies that make up its Scope 3. This is the biggest barrier. For this step to be effective, it is essential that the boundaries for measuring Scope 3 emissions are standardized. Otherwise,	Step 2: Meet the Scope 3 Claim requirements	Carbonext

Comments (compiled)	Section of the Claim	Respondent name/ organisation
some organizations may reduce their emissions simply by excluding certain items from their calculations, thereby shrinking their measurement boundaries (due to a lack of clear rules on Scope 3 emission inclusions).		
As VCMI has also made clear in its proposal, organisations face a lot of challenges in reducing their Scope 3 emissions. The complexity, scale, and external dependencies associated with Scope 3 emissions make it challenging. However, the barriers that exist and may continue to exist in 2038, are no reasons for companies not to continue to attempt to decarbonise and reduce their emissions. The next two decades are crucial and companies must use their resources on emission reduction, including to tackle the barriers that exist.	General	ECOS
Expecting that by 2038 companies will have addressed scope 3 emission reduction barriers is simply kicking the can down the road, and hoping for a Hail Mary solution. There is no logical or evidentiary basis for this claim, and it simply reflects a lack of leadership to do what is right today. As we have noted already, Scope 3 is inherently flawed, and there is no magic that will make it operable in 2038 or even 3038. What is needed is a robust accounting mechanism to verifiably and truthfully track progress toward geological net zero. This is what we are hoping the VCMI will do.	General	E-liability Institute
Companies should strive to tackle the barriers to Scope 3 reductions as soon as possible. The extent to which carbon credits are needed to meet Scope 3 claims is captured by additionality tests. Carbon credits will become less additional as barriers to emissions reductions are removed and therefore credits are needed less. However, there remains an ongoing need to finance carbon removals, as they have high upfront costs and complex technology. This can continue to be achieved by using high-integrity carbon credits.	Step 2: Meet the Scope 3 Claim requirements	BeZero Carbon
Consistency supports broader understanding so organizations can be evaluated against the same criteria.	Step 2: Meet the Scope 3 Claim requirements	Invert
Transparency in disclosure supports accountability and a baseline for measurement and communication.	Step 2: Meet the Scope 3 Claim requirements	Invert
Public disclosure creates transparency of barriers to scope 3 emissions reduction and helps companies become accountable for their actions. Text is clear. Feedback provided above.	Step 2: Meet the Scope 3 Claim requirements	AHDB

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It forces companies to be proactive with identifying the barriers and addressing them. Additionally, by publicly disclosing actions to remove barriers, knowledge exchange is enabled which could help accelerate progress across companies.	Step 2: Meet the Scope 3 Claim requirements	AHDB
This can help raise the profile of significant barriers which could aid is developing solutions.	Step 2: Meet the Scope 3 Claim requirements	AHDB
In accordance with the hierarchy approach, the proposed actions are important.	Step 2: Meet the Scope 3 Claim requirements	TOKYO GAS CO.,LTD.
It is assumed that it will be difficult to disclose all of the barriers that companies face, so we propose that the requirements be made feasible for companies by considering the significance of the impact and the possibility of control.	Step 2: Meet the Scope 3 Claim requirements	TOKYO GAS CO.,LTD.
We agree if the feasibility is taken into account.	Step 2: Meet the Scope 3 Claim requirements	TOKYO GAS CO.,LTD.
Submitting plans for meet scope 3 barriers, doesnt directly mean that companies will act on those and could therefore benefit from a claim without actually processing any work. this is patricularly true if they exist in areas or supply chains where peers are conducting work, they can potentially free ride scope 3 reduction whilst claiming to be doing more than others	Step 2: Meet the Scope 3 Claim requirements	Anonymous
FincoEnergies believes the mix of quantitative and qualitative descriptions together will provide a sound understanding to the public of the company's progress, barriers and efforts. We would also like to stress however that these requirements would represent a significant investment in time and money to fulfill, and already perhaps present a prohibitive barrier to some. Therefore, FincoEnergies urges VCMI to balance the valid purpose of the requirements with ensuring they do not become a prohibitively high hurdle for companies. As such, we suggest that VCMI does not increase the stringency of these requirements. Survey question submission.	General	FincoEnergies
Such disclosures and action plans provide both transparency and opportunity for the company to be held accountable by the public. It also ensures that the company has actively considered its challenges and identified solutions and publicly committed to them. Therefore these requirements promote both integrity and stimulus for action.	General	FincoEnergies

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Again, FincoEnergies urges VCMI to strike a balance between requirements support integrity with the barriers/hurdles these can present to companies in participating in the Scope 3 Claim System.		
FincoEnergies urges caution with such mandatory public disclosures, particularly at these early stages of development of the Scope 3 Claim when the focus should be on encouraging and maintaining participation in the framework. Transparency of ultimate progress is already provided via their public GHG inventory disclosures, and periodic updates of the scope 3 barrier reports and consequent action plans will publicly demonstrate the pace of progress on addressing their scope 3 barriers. Again, FincoEnergies urges VCMI to strike a balance between requirements to demonstrate and support integrity with the barriers/hurdles these can present to companies in participating in the Scope 3 Claim System.	Step 2: Meet the Scope 3 Claim requirements	FincoEnergies
Public disclosure of the barriers a company faces contributes to a company's transparency and credibility. However, establishing a plan with time bound actions is a step in committing to reducing Scope 3 emissions, but the act of actually reducing the emissions and transitioning to a more sustainable business model is what is needed. Many companies have already committed to reaching net zero by 2050, however, there is a gap in transition plans actually being implemented. See: Net zero targets among world's largest companies ... | Net Zero Tracker	Step 2: Meet the Scope 3 Claim requirements	ECOS
Companies should be transparent and publicly disclose their transition plans. To include the barriers, they face can be a useful way to share knowledge and best practices. However, VCMI's suggestion to making it mandatory for companies to disclose if they are missing their emission reduction targets, should not be used as a justification to use carbon credits.	Step 2: Meet the Scope 3 Claim requirements	ECOS
Such disclosures require companies to define the barriers that are behind their interest in using the Scope 3 Claim. It can therefore contribute to allowing stakeholders to assess whether the companies efforts are meaningful, and if their definition of the barriers is reasonable.	Step 2: Meet the Scope 3 Claim requirements	MSCI
Beyond the first year of a company's claim, disclosing specific progress toward time-bound actions will be essential for demonstrating a meaningful commitment to reducing Scope 3 emissions. While having a plan to reduce Scope 3 emissions is important, providing evidence that the plan is being effectively implemented is crucial for showcasing an ongoing commitment to reducing these emissions. Additionally, this evidence will highlight the impact of the Claim as a mechanism for addressing barriers to Scope 3 emission reductions.	Step 2: Meet the Scope 3 Claim requirements	MSCI

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The statement lacks clarity; it is unclear whether it pertains to the Scope 3 Claim itself, or if it is stating that this should be mandated through some form of regulation. If it relates to the Scope 3 Claim, this should be established as a requirement.	Step 2: Meet the Scope 3 Claim requirements	MSCI
It is not clear how or even if VCMI will determine if sufficient measures to overcome barriers before making a claim.	Step 2: Meet the Scope 3 Claim requirements	Anonymous
This is subjective and most likely reliant on qualitative data. The audience who this aims to satisfy, will likely be highly skeptical of the explanations given, and open the company up criticism. -	Step 2: Meet the Scope 3 Claim requirements	Anonymous
The requirement for companies to publicly disclose their progress towards targets and whether a company believes it's on track, their Scope 3 emissions gap, and the actions taken to address reduction barriers are all requirements that enhance accountability and transparency and serve as good guardrails for the Scope 3 Claim. This information allows stakeholders to evaluate the effectiveness of a company's climate strategy.	Step 2: Meet the Scope 3 Claim requirements	Anew Climate
Failing to meet interim targets and needing to use carbon credits to compensate for these emissions should be disclosed publicly along with public disclosure of barriers to reducing Scope 3 emissions. When disclosed along with actionable plans and timelines, these disclosures reflect commitment to addressing challenges and demonstrate that companies are not only aware of their obstacles but are also actively working to overcome them. This is in alignment with the IETA Guidelines, which we support, particularly pg 14. (Available here: https://www.ieta.org/wp-content/uploads/2024/04/IETA_VCM-Guidelines.WEB-2.pdf)	Step 2: Meet the Scope 3 Claim requirements	Anew Climate
While we absolutely support requiring disclosure of certain elements of a company's net zero strategy, targets and emissions, we strongly disagree with requiring companies to report on their failures. We support requiring disclosure of: a company's current and base year emissions, company goals, plans and strategies for emission reduction, challenges anticipated towards meeting goals, how a company is working to overcome those challenges, if a company is using carbon credits and how many were used. However, requiring companies to report on their failures and the reasons targets and barriers are not being met creates a disincentive to disclose. Companies are already scared to make claims related to their climate action, due to fear of recourse (e.g. greenhushing) - requiring this level of disclosure, on failures, is simply unworkable for most companies. Quite simply, companies will not do this.	Step 2: Meet the Scope 3 Claim requirements	Anew Climate

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Transparency is necessary for high-functioning corporate climate action. We agree that disclosure of the scope 3 emissions gap is necessary.	Step 2: Meet the Scope 3 Claim requirements	Rubicon Carbon
Failing to meet interim targets and needing to use carbon credits to compensate for these emissions should be disclosed publicly along with public disclosure of barriers to reducing Scope 3 emissions. When disclosed along with actionable plans and timelines, these disclosures reflect commitment to addressing challenges and demonstrate that companies are not only aware of their obstacles but are also actively working to overcome them. This is in alignment with the IETA Guidelines, which we support, particularly pg 14. (Available here: https://www.ieta.org/wp-content/uploads/2024/04/IETA_VCM-Guidelines.WEB-2.pdf)	Step 2: Meet the Scope 3 Claim requirements	Rubicon Carbon
While we absolutely support requiring disclosure of certain elements of a company's net zero strategy, targets and emissions, we strongly disagree with requiring companies to report on their failures. We support requiring disclosure of: a company's current and base year emissions, company goals, plans and strategies for emission reduction, challenges anticipated towards meeting goals, how a company is working to overcome those challenges, if a company is using carbon credits and how many were used. However, requiring companies to report on their failures and the reasons targets and barriers are not being met creates a disincentive to disclose. Companies are already scared to make claims related to their climate action, due to fear of recourse (e.g. greenhushing) - requiring this level of disclosure, on failures, is simply unworkable for most companies. Quite simply, companies will not do this.	Step 2: Meet the Scope 3 Claim requirements	Rubicon Carbon
n/a	Step 2: Meet the Scope 3 Claim requirements	Netflix
VCMI should require companies to publicly explain why they think they are "on-track" (instead of "making progress") in their Scope 1 and 2 targets. Otherwise, VCMI should more clearly define what is sufficient progress for a company wanting to make a Scope 3 claim.	Step 2: Meet the Scope 3 Claim requirements	The Nature Conservancy
Requiring companies to publicly disclose plans to overcome Scope 3 barriers should effectively commit companies to reducing their scope 3 emissions. To further assist companies, VCMI should provide examples of common barriers and their adequate disclosure and a detailed MRV framework explaining how disclosures will be audited. To ensure that stakeholders can evaluate whether a company is making meaningful efforts to meet its Scope 3 target, companies should be required to disclose their decarbonization barriers and progress in overcoming them. Moreover, requiring companies to share progress will also help stakeholders identify sector-wide decarbonization obstacles,	Step 2: Meet the Scope 3 Claim requirements	The Nature Conservancy

Comments (compiled)	Section of the Claim	Respondent name/ organisation
allowing them to develop pre-competitive collaborations to reduce Scope 3 emissions. VCMI should provide examples of adequate disclosure of their Scope 3 barriers and progress to assist companies in making sufficiently complete reports.		
Our view is that the framework could be more effective if claims were allowed only after a company creates a decarbonization strategy and initiates programs to address barriers over a short term period (~5 years). Tying corporate renumeration to scope 3 performance is one way to ensure accountability and provide confidence that the company has made meaningful efforts to removing scope 3 barriers prior to purchasing offsets. As above	Step 2: Meet the Scope 3 Claim requirements	Accela Research
We are supportive of companies providing clearer Scope 3 strategies, outlining what they can do now, what is expected from the sector and what they need from others to make progress. We recommend this disclosure is more than qualitative. Specifically, we recommend a company is required to provide a view of the decarbonisation opportunities applicable to material emission sources within individual Scope 3 categories. These should be further broken down by geography to allow users of the disclosure to understand regional specific barriers. For each decarbonisation opportunity, the company should provide a view of the cost of implementing the opportunity in the value chain and how these compares to their investment threshold (which in this case would be their obligatory offset costs (see Accela's Climate Value Chain Framework). By providing a view of the size of the investment needed it creates transparency on how easy or hard it would be to decarbonise the emission source. Companies can then identify what actions they can take to unlock barriers (e.g. company policies, advocacy, co-investment with value-chain partners). Any timebound actions arising from this exercise should be supported by qualitative and quantitative metrics disclosed annually to track progress (e.g. % of supply chain engaged etc) (https://www.accelaresearch.com/research/climate-value-chain-framework). As above	Step 2: Meet the Scope 3 Claim requirements	Accela Research
Companies should publicly disclose the five most significant decarbonization levers and the associated address barriers to realising their abatement opportunities. This will help initiate conversations across the value chain. As above	Step 2: Meet the Scope 3 Claim requirements	Accela Research
While such disclosures can increase awareness, they may often lack the necessary depth and rigor to truly impact corporate behavior. Instead, we advocate for the implementation of the E-liability framework, which goes beyond unverifiable disclosure by establishing a structured approach to emissions accounting and reduction. This framework emphasizes accountability and offers a clear pathway for companies to identify, measure, and address their upstream and direct emissions effectively. Please see our earlier responses. While such disclosures can increase awareness, we currently lack a	Step 2: Meet the Scope 3 Claim requirements	E-liability Institute

Comments (compiled)	Section of the Claim	Respondent name/ organisation
sound accounting basis upon which emissions disclosures are made. We advocate for the implementation of the E-liability framework, which establishes a structured approach to emissions accounting, informing meaningful reduction action. This framework emphasizes accountability and offers a clear pathway for companies to identify, measure, and address their upstream and direct emissions effectively. Please see our earlier responses.		
N/A	Step 2: Meet the Scope 3 Claim requirements	Anonymous
In this context companies falling to meet interim targets and needing to use carbon credits to reduce or compensate should disclosed publicly the challenges experienced and planned future actions to meet them. Scope 3 are shared emission and collaboration should be fostered between actors of the supply chain via more transparency. Transparency in disclosure supports accountability and a baseline for measurement and communication	Step 2: Meet the Scope 3 Claim requirements	BURN manufacturing
This would aligned requirements for the financial performances and requirements for the environmental performances which is the only way to ensure the integration of the carbon strategy into corporation development strategy.	Step 2: Meet the Scope 3 Claim requirements	BURN manufacturing
The description is clear and well structured No specific changes except for prior comments to be included for the 2038 deadline and the gap value.	Step 2: Meet the Scope 3 Claim requirements	BURN manufacturing
We support the public disclosure of the scope 3 emissions gap and the actions taken to remove scope 3 emission reduction barriers. Increasingly regulation is requiring public disclosure by companies on climate strategies and decarbonization progress. We support both voluntary and regulatory disclosure. Transparency in disclosure support accountability and a baseline for measurement and communication.	Step 2: Meet the Scope 3 Claim requirements	RWEST
The requirement for companies to publicly disclose their progress towards targets and whether a company believes it's on track, their Scope 3 emissions gap, and the actions taken to address reduction barriers are all requirements that enhance accountability and transparency and serve as good guardrails for the Scope 3 Claim. This information allows stakeholders to evaluate the effectiveness of a company's climate strategy.	Step 2: Meet the Scope 3 Claim requirements	Climate Impact Partners
We agree with the disclosures here, but would add the option to point VCMI towards this information if disclosed elsewhere. For example, as part of the CSRD 's Transition Plan Requirements, which requires, under its "Climate Change Standard", "Clear mitigation actions and decarbonisation levers to achieve the GHG emissions plan".	Step 2: Meet the Scope 3 Claim requirements	Climate Impact Partners

Comments (compiled)	Section of the Claim	Respondent name/ organisation
This disclosure would enhance transparency of progress however the requirement to disclose failures may act as a significant barrier for organisations to commit to this claim due to fear of wider consequences and criticism. Instead, this could be reflected through disclosure and reporting about current, prior and baseline year emissions, reduction strategies and goals, in addition to the barriers and challenges faced.	Step 2: Meet the Scope 3 Claim requirements	Climate Impact Partners
Clear set of requirements. Clear set of requirements. Reporting requirements such as CSRD and others does this, and If one pushes companies to declare publicly shortfalls in detail, they is a risk that may choose not to participate in the Scope 3 Claim altogether.	Step 2: Meet the Scope 3 Claim requirements	Sopra Steria Group
This is a welcome requirement. It is necessary but insufficient to guarantee the integrity of the claim. It should be clear that disclosure of barriers is only meaningful if there can be a check on progress made over time. Companies should be required to continue reporting on barriers that were reported in previous years, until these barriers have been overcome or have become irrelevant. This is to ensure that this requirement is not only focused on reporting and transparency, but is also directly connected to actual actions. Increased transparency is always welcome. Please see the above section.	Step 2: Meet the Scope 3 Claim requirements	Carbon Market Watch
Focusing the reporting requirements on acknowledging the challenges associated with reductions in the scope 3 space and the barriers companies are working to overcome is a welcome change from just reporting a number with limited context. We support this additional level of disclosure to show stakeholders the challenges companies face in this space and the efforts they are taking that wouldn't normally be reflected in an inventory. Focusing the reporting requirements on acknowledging the challenges associated with reductions in the scope 3 space and the barriers companies are working to overcome is a welcome change from just reporting a number with limited context. We support this additional level of disclosure to show stakeholders the challenges companies face in this space and the efforts they are taking that wouldn 't normally be reflected in an inventory. Disclosure and transparency are important within the Scope 3 space given the challenges around showing any progress due to the function of how inventories are calculated. Companies should be rewarded for their transparency and efforts towards reducing their Scope 3 emissions including the purchase of carbon credits to compensate their emissions.	Step 2: Meet the Scope 3 Claim requirements	Bayer Crop Science
No further feedback	Step 2: Meet the Scope 3 Claim requirements	Perspectives Climate Research

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Neither agree nor disagree. We encourage VCMI to begin with a lighter touch in terms of requiring what companies must share regarding their barriers. This way, it lowers the bar of entry and participation to more corporates and builds a habit of disclosure, instead of making an overbearing ask for complete transparency immediately from the start.	Step 2: Meet the Scope 3 Claim requirements	American Forest Foundation
We suggest VCMI take care to consider what exactly is required for companies to publicly disclose if this is made mandatory. It shouldn 't be too deep a touch that it would deter disclosure. Companies need clarity as to what exactly VCMI is looking for in "demonstrating progress". The lack of clarity here could potentially lead to miseducation and misinterpretation of the Scope 3 requirements.	Step 2: Meet the Scope 3 Claim requirements	American Forest Foundation
As documented in the IETA Guidelines companies falling to meet interim targets and needing to use carbon credits to compensate should disclosed publicly the challenges experienced in meeting targets and planned future actions to meet them. Refer to IETA Guidelines Page 14. Transparency in disclosure supports accountability and a baseline for measurement and communication. Align with IETA Guidelines carefully considering the extent of disclosed information.	Step 2: Meet the Scope 3 Claim requirements	IETA
As documented in the IETA Guidelines companies falling to meet interim targets and needing to use carbon credits to compensate should disclose publicly the challenges experienced in meeting targets and planned future actions to meet them. Refer to IETA Guidelines Page 14. This enhances accountability for commitments. However, requiring companies to report on their failures and the reasons targets and barriers are not being met creates a disincentive to disclose. However, IETA members recognize that many companies will find a challenge to publicly disclose on failed strategies as it will be reputationally damaging and competitively sensitive. The extent of disclosed should need to be carefully considered. Align with IETA Guidelines carefully considering the extent of disclosed information.	Step 2: Meet the Scope 3 Claim requirements	IETA
The requirement for companies to disclose barriers faced in reducing scope 3 emissions and their plans to address these barriers provides insight into the challenges companies are facing and the actions they are taking to overcome them. This transparency can help to identify areas where collaboration and support are needed to accelerate decarbonisation efforts.	Step 2: Meet the Scope 3 Claim requirements	Carbonplace
This transparency is important for holding companies accountable and incentivising them to take meaningful action to address their climate impact. By publicly acknowledging their shortcomings and challenges, companies can: · Increase stakeholder pressure: Public disclosure can lead to increased scrutiny from investors, customers, and other stakeholders, motivating companies to prioritise emissions reduction efforts. · Foster collaboration: Sharing challenges can facilitate collaboration with industry peers, governments, and NGOs to develop innovative solutions and overcome barriers. · Drive innovation: Identifying and addressing barriers can stimulate the development of new technologies and practices that can accelerate emissions reductions. · Build trust: Transparency can help to build trust with stakeholders, demonstrating a commitment to addressing climate	Step 2: Meet the Scope 3 Claim requirements	Carbonplace

Comments (compiled)	Section of the Claim	Respondent name/ organisation
change. While it may be challenging to publicly acknowledge shortcomings, the long-term benefits of transparency outweigh the potential short-term risks.		
Companies that have a robust understanding of the factors that hinder the reduction of their value chain emissions, will be able to effectively reduce their scope 3 emissions, leading to broader societal and environmental benefits. We suggest providing examples of barriers, e.g. boundary granularity, emissions factors, absence of adequate government policies, and introduce the concept of interdependencies (e.g. is new technology, or government policy needed to achieve the targets?) Explaining interdependencies would make it clearer what is in the companies ' control and what is outside of their control. As stated in the previous response, it is not possible to manage what is not measured. Companies that measure and adequately publicly identify barriers should reasonably be perceived as committed to the reduction of their environmental footprint throughout their value chain. Emerging climate disclosure laws are incentivizing companies to have a good grasp of the barriers they face to reduce their scope 3 emissions to better comply with upcoming climate disclosure requirements, given that emissions could become a liability in a company 's balance sheet. Disclosing the metric of scope 3 emissions as well as barriers provides an avenue to better tailor companies ' business models for carbon management. None	Step 2: Meet the Scope 3 Claim requirements	Center for Climate and Energy Solutions
Companies that disclose when they are not on track to meet their goals are also more accountable for the targets they set in the first place. Secondly, disclosing barriers could present an opportunity to map common barriers to scope 3 decarbonization within an industry/sector. Transparency on this aspect could also enhance collaboration among companies, making progress on the long-term goals of the Paris Agreement. None	Step 2: Meet the Scope 3 Claim requirements	Center for Climate and Energy Solutions
standardized, comprehensive and compaarable with regard to their quantitative aspects. Ten years of voluntary disclosures to the U.S. Securities and Exchange Commission under the Dodd Frank Act authorities yielded little information that was usable for investments decisions, including if those disclosures included climate related opportunities to add new product lines or operational efficiencies to reduce emissions. This statement is too vague for us to form an opinion, but as we noted above, it is more likely that badrriers can be reduced, rather than removed entirely, within a near term target boundary even if the identified barrier is a regualtory or legal one.	Step 2: Meet the Scope 3 Claim requirements	Institute for Agriculture and Trade Policy

Comments (compiled)	Section of the Claim	Respondent name/ organisation
To whom is this disclosure made? To VCMI? To investors or insurers of the corporate? To target setting organizations, such as SBTi? To government regulators? What are the consequences of such mandatory disclosure? Making a disclosure mandatory does not in itself ensure that the disclsoure will assist the reduction of Scope 3 emissionns.	Step 2: Meet the Scope 3 Claim requirements	Institute for Agriculture and Trade Policy
Companies are very unlikely to make mandatory disclosures if there is no quantative definition of "sufficient progress" and if they face litigation or reputation risks for failing to make "sufficient progress. Any mandatory disclosure should come with a regualtory safe harbor from litigation during the near term target boundary, if the disclosing company provides food faith and audited reporting of its estimated emissions disaggregated into Scopes 1, 2 and 3. The mandatory disclosure of barriers may be qualitative and/or quantitative, and the same safe harbor from litigation should apply. The statement would have to be rewritten per our general comment.	Step 2: Meet the Scope 3 Claim requirements	Institute for Agriculture and Trade Policy
There is a limited target group which will be able to understand and assess the information provided.	Step 2: Meet the Scope 3 Claim requirements	ClimatePartner
Transparency on all levels is needed.	Step 2: Meet the Scope 3 Claim requirements	ClimatePartner
This will enable transparency and justification for the use of credits if the barriers identified are significant challenges rather than hard to abate due to cost. The barriers identification will increase visibility over supply chain challenges, helping companies better address entities or products upstream or downstream, getting them aligned with NetZero goals sooner. The explanation of barriers will provide for clarity of justification to invest in NCS and greater integrity of claims. It will also allow year over year assessment of how barriers change over time and help civil society and solution providers identify where to focus efforts The companies should be able to explicitly outline the barriesrs when not meeting scope 3 targets but also this should not present and significant burden that could disintevize participation in VCMI claims code. Eg. ideally this disclosure would directly align with CDP, GRI, CSRD and/or other major dislosure frameworks.	Step 2: Meet the Scope 3 Claim requirements	Conservation International

4 Calculations

Comments (compiled)	Section of the Claim	Respondent name/ organisation
the text should emphasize that companies need to clearly disclose which calculation approach they are using to maintain transparency and consistency in reporting.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
Scope 3 emissions gap could be better explained, what is clearly meant by this? I don't understand the two calculation approaches regarding the gap, examples are needed. What would be very useful is providing examples accompanying the rules to ensure a common understanding.	Step 2: Meet the Scope 3 Claim requirements	Marine Klobut
2. A generalized Figure 5 should be included in the document as early as possible as it most clearly demonstrates how the emissions gap and emissions gap limit is calculated. 2. Include a Figure to demonstrate how the emissions gap and emissions gap limit is calculated.	Step 3: Meet the required carbon credit use and quality thresholds	IETA
A generalized of Figure 5 should be included in the document as early as possible as it most clearly demonstratres how the emissions gap and emissions gap limit is calculated.	Step 3: Meet the required carbon credit use and quality thresholds	Invert
Calculate the scope 3 Emissions Gap No comments.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonext
We suggest introducing the concept of the Scope 3 emissions gap before outlining what companies need to do. At present, the description of the methodology states that companies must define their current Scope 3 emissions gap without first explaining what that term means. To improve clarity, it would be beneficial to first define the Scope 3 emissions gap and its significance, and then proceed to the necessary actions companies are required to take. We suggest restructuring it as: - General introduction to the Scope 3 Claim - State that the aim is help companies address the Scope 3 emissions gap - Define what a Scope 3 emissions gap is - Outline what a company must do to address the gap and make a claim	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
Not sure I understand this so put neither agree of disagree (sorry I am running short on time!).	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson

Additionally, it may be useful to provide more explanation or a formula for calculating the gap to avoid any confusion, particularly when applying this to complex corporate structures.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
What about where companies have supplier engagement targets (either for all scope 3 or for certain categories or sources)?	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson
What about if a company has an intensity target? You probably need to explain the calculation for that.	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson
Is it based on scope 3 emissions in the target boundary or total scope 3?	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson
This seems clear and straightforward.	Step 3: Meet the required carbon credit use and quality thresholds	Claire Wigg
We consider the introduction of transparency about "emissions gaps"□ to be a key step forwards for the climate accountability ecosystem. To require companies to disclose trajectories for their progress between base year and targets, and to set guardrails on those trajectories, is a very helpful development. Apart from the financial allocation requirement discussed above, we consider the Foundational Criteria to also be helpful additions to the suite of accountability frameworks available to companies and stakeholders. For the most part we support all the disclosure requirements being proposed for users of this claim.	Step 3: Meet the required carbon credit use and quality thresholds	Claire Wigg
See comments above	Step 3: Meet the required carbon credit use and quality thresholds	AHDB
Credible way forward. Unsure to comment. Agree with content. None. None.	Step 3: Meet the required carbon credit use and quality thresholds	Sopra Steria Group

In a science based near term net zero target the verification of progress towards achieving the measures absolute emissions reductions beginning at the end of the contracted commitment although companies can also optionally report emissions intensity figures as an indicator of progress. Committed companies cannot select a reporting that is most recent if that year is not the first year of the net zero commitment conract.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy
Establish that "most recently reported" means cumulative absolute emissions at the end of the first year following the next zero commitment.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy
No comment.	Step 3: Meet the required carbon credit use and quality thresholds	Invert
If a company aims to be science aligned it needs to have an accurate GHG inventory, calculate its base year emissions and set targets for emission reductions. This data should be used to continue aligning with 1.5C and to reduce emissions. Using this information to require an additional calculation to estimate if Scope 3 emission gap is greater or less than 24% does not contribute to a companys transition pathway.	Step 3: Meet the required carbon credit use and quality thresholds	ECOS
No Comments.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
While the calculation of the emissions gap and trajectory seem like they would be quite complicated, the schematic and equations in this section are quite clear. Nonetheless, additional clarification for the process to report on or submit this data to the VCMI would improve it. Add clarification on process to submit this data to the VCMI.	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate
We have no specific comments on this figure.	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon
Scope 3 reductions will initially come from better data. Unclear whether companies expected to rebaseline upon having better data or does this count as an emission reduction?	Step 3: Meet the required carbon credit use and quality thresholds	Accela Research

Please see our responses above, and please note our offer to assist in any technical matters that you would like to clarify. Please see our responses above, and please note our offer to assist in any technical matters that you would like to clarify.	Step 3: Meet the required carbon credit use and quality thresholds	E-liability Institute
OK, none. None	Step 3: Meet the required carbon credit use and quality thresholds	Sopra Steria Group
Just one comment on the text as such. If the company provides a low unaudited base year of emissions in emissions intensity terms, the targeted reduction can be realized within the Scope 3 claim calculation while the company is increasing its Scope 3 emissions. use the term absolute emissions throughout the calculations text	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy
VCMI should not allow companies to use the Scope 3 claim with intensity based targets as these are not not necessarily aligned with the 1.5C Paris Agreement global decarbonization goals. If companies need flexibility in addressing their emission gaps, VCMI should provide it through its guardrails, not by allowing companies to use less ambitious targets. NA	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
Really helpful to have these examples!	Step 3: Meet the required carbon credit use and quality thresholds	AHDB
No Comments.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
We have no specific feedback on these figures and example calculations.	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon
No comment on the diagrams here beyond previously provided feedback	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
None. None.	Step 3: Meet the required carbon credit use and quality thresholds	Sopra Steria Group

This section is limited to providing examples that illustrate the requirements which are outlined in the rest of the document. We do not have comments on the examples, but our comments on the rules that they illustrate are all applicable here (e.g. 24% is an excessive threshold, setting the threshold based on target emissions instead of the gap between target emissions and actual emissions is not stringent enough, 2038 is too late, etc.).	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch
VCMI should not let companies use the Scope 3 claim through intensity based targets, as these are not aligned with the Paris Agreement global decarbonization goals. NA	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
Calculations needed No comments.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonext
Examples of Scope 3 Claim Calculations No comments.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonext
Has there been any consideration to the non-linear reductions often seen in Scope 3 emissions inventories and if a hard and fast 24% is achieving the intended outcomes of driving ambition. Many companys inventories are still very linked to their procurement spend which goes up in good years and down in bad. This cyclical nature could make complying with this rule challenging every year and what does that mean for a company year over year. One recommendation would be to include a range or rolling average that could also be used to smooth out the curve. Provided all comments under the above statements.	Step 3: Meet the required carbon credit use and quality thresholds	Bayer Crop Science

5 Complexity/ understanding

Comments (compiled)	Section of the Claim	Respondent name/ organisation
More clarity could be added regarding how to handle scenarios where the gap exceeds 24% of the trajectory. For instance, what are the corrective measures companies should take in such cases? This would provide a clearer path of action.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
The revised version attempts to flow more smoothly and uses slightly different phrasing to convey the same ideas. It also introduces the concept of a "spectrum of comprehensibility" to emphasize the range of understanding levels. Overall, this revised statement effectively communicates the multifaceted nature of the Scope 3 claim methodology's clarity	General	Anonymous
For experts in energy, carbon management, or sustainability, the Scope 3 claim methodology is clear and actionable, offering enough detail to implement and track progress. For a general business audience or companies new to emissions reporting, it may be complex without additional clarification or simplification.	General	Hatem Ali
The way the claim is written at present it is hard to understand. Suggest simplifying with a short paragraph describing the claim as succinctly as possible (in line with the carbon integrity claims, then using subheads to signpost more clearly. Suggestion below in proposed changes to the text below. See suggested change to the text below Suggested re-write along the lines of below VCMI's Scope 3 Claim requires companies that are making progress towards near term reduction targets on scope 1 and 2 emission but falling short on Scope 3 emissions due to barriers, to purchase high integrity carbon credits to an amount equal or greater than their Scope 3 emissions gap in any given year. Requirements To Make A Claim In order to make a claim companies must: ·Meet VCMIs Foundational Criteria ·State their current scope 3 emissions gap between target and reductions achieved · Explain measures that have been implemented to achieve scope 3 emissions reduction and results obtained ·Provide a plan to overcome remaining barriers, and the timeframe needed to achieve it ·Demonstrate that they are investing to overcome existing barriers to get back to the scope 3 emissions trajectory consistent with their net zero commitments. Guardrails The following guardrails must be applied to ensure adherence to mitigation hierarchy - The scope 3 emissions gap must not exceed 24% of a company's scope 3 trajectory emissions included in the target boundary in the year it is making the claim.	General	Philip Brady

Comments (compiled)	Section of the Claim	Respondent name/ organisation
- The scope 3 emissions gap must decline over time, leading to complete phaseout by 2038. At this point, there should be no further emissions gap and carbon credits should not be used to make a Scope 3 Claim. Calculation Approaches Two calculation approaches are provided for determining a company's permitted emissions gap: - an annual calculation, through which the limit of the emissions gap is calculated each year a company makes a claim; and - a carbon budget approach, through which the limit of the emissions gap is calculated by companies for their entire near-term target implementation period. Option (1) is used as a reference for the Four Steps provided below and modifications needed for Option (2) are given at the end of the Step 3 explanation, with further details being provided in Box 6.		
The text is clear and easy to follow None.	Step 1: Comply with the Foundational Criteria	Invert
The third bullet point, "Apply guardrails: Gap size and Timeframe," lacks clarity. We suggest providing an explanation for this bullet point that matches the level of detail present in the rest of the diagram.	The four steps to making a scope 3 claim	MSCI
This figure is a clear overview of the steps to making a scope 3 claim. We will provide comments on the individual steps in subsequent sections.	The four steps to making a scope 3 claim	Rubicon Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
1. How credits can be counted towards climate targets (the use case), is the priority and less so the claim. Recommend VCMI pays equivalent attention to use cases without the focus on claims. 2. Provide more clarity on how the two calculation approaches for determining a company's permitted emissions gap can be implemented and reasons why a company may choose one or the other. 3. Although this is addressed in the VCMI Claims Code through the MRA framework, this framework would benefit for clarity, to cross-reference on how progress towards meeting its near-term scope 1 and 2 emission reduction targets is measured and verified (audit). What if progress is assessed as insufficient? Idem for: Publicly disclose the barrier(s) faced to reducing scope 3 emissions. 4. We support that all companies should set emission reduction targets for emissions from sources that they own and control (scopes 1 & 2) but we are concerned with setting either emission reduction targets or alignment targets covering scope 3 emissions. Many companies have a majority of their emissions in the downstream portion of their value chain. Being able to influence those emissions requires a company to know who is involved in the further processing and marketing of products. For corporations that operate in global markets increasing a producer's costs in one country or region, allows a producer from another country or region, not incurring the same costs, to displace the higher priced products. It is counterintuitive to allow less responsible companies to set the price and continue without a cost of emission reductions and to displace lower emissions intensity producers. 5. VCMI should consider the double counting of emissions in scope 3, where the same emissions can be counted in the scope 3 emissions of several different companies, perhaps in different sectors of the economy. If you introduce scope 3 emissions into a target making framework you are demanding double claiming, as any scope 1 or 2 emission reduction carried out by a company within the value chain can also be claimed as a reduction in scope 3 emissions by the reporting company. This should also apply to carbon credits where any finance contributed to reduce a within value chain emission reduction can be claimed as a reduction by both the scope 1 or 2 emitter and the scope 3 funder. 1. Guidance on how credits can be counted towards climate targets (use cases for carbon credits) 2. Guidance on how the two calculation approaches for determining a company's permitted emissions gap can be implemented 3. Guidance on how progress towards meeting its near-term scope 1 and 2 emission reduction targets is measured and verified, based on the VCMI Claims Code through the MRA framework 4. Guidance of overlapping value chain measurement as being address, for example, by the AIM Platform. 5. Guidance on how will VCMI address the double claiming of Scope 3 emissions.	General	IETA
As above - however importantly, it should be clear that credits are not being used as a way to meet reduction goals, but rather to compensate for unabated emissions. This option appears to be an alternative to SBTi's BVCMI guidance (though somewhat aligned).	General	Climate Impact Partners

Comments (compiled)	Section of the Claim	Respondent name/ organisation
As explained in the general comment "Scope 3 Claim, b)" at the beginning of the consultation, we suggest focusing on closing the 24% maximum gap limit and communicating the use of carbon credits beyond the Scope 3 and/or other scopes to explicit language saying so (maybe another separate claim), to avoid perception of blurring the lines of the mitigation hierarchy. The concern is avoiding the perception that the Scope 3 Claim can be used as a tool for companies to purchase carbon credit instead of prioritizing value chain decarbonization. Also, for a more granular approach to be considered, as noted above, this % could vary with the percentage that Scope 3 emissions represent in the overall carbon footprint. As per early comment in "Scope 3 Claim, b)" and "Calculate Scope 3 emission gap d)" consider erasing "or greater than" and add language for when excess credits are purchased for scope 3 and possibly other scopes (if not making a different claim altogether).	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
It is unclear whether companies emitting more than 24% will be required to offset and still have their claims rejected, or whether compensation is mandatory at all, or if the risk is purely reputational.	General	Carbonext
Box 6: Option to be considered It is not clear whether this option and 'Box 5: Option to be considered' are mutually exclusive or complementary.	General	Carbonext
General Questions It is unclear whether companies emitting more than 24% will be required to offset and still have their claims rejected, or whether compensation is mandatory at all, or if the risk is purely reputational.	General	Carbonext
The aim of a standard is to harmonise practices and to ensure comparability between users of the standard. The VCMI Scope 3 Claim does not provide clear guidelines for what constitutes a valid barrier for companies nor what is sufficient for a company to demonstrate meaningful commitment, this leaves too much to the discretion of the standard users. Furthermore, regardless of the requirements, to include carbon credits in Scope 3 risks the credibility of the company and its transition plan.	General	ECOS
The text explanation is not very clear around how credits can be used to make up the 24% gap. The graphics that explained the Scope 3 trajectory and the 24% gap were more helpful for the reader to understand the premise and should be utilized early in the text/document to explain the approach. The wording and the text itself is a bit confusing without the additional graphic and context. To improve clarity, we recommend adding in more plain language to describe the calculation process. To improve clarity, we recommend adding in more plain language to describe the calculation process and Add in plain language the logic behind how the two numbers were chosen.	Step 3: Meet the required carbon credit use and quality thresholds	Bayer Crop Science

Comments (compiled)	Section of the Claim	Respondent name/ organisation
This is much better explained in the summary document sent out. Refer to the summary pack sent out, the layout and sequence of information makes it much easier to understand. Refer to the summary pack sent out. That has a sequence of information that makes it all much easier to understand.	General	Natwest Group
Absence of an actual claim leads to overall confusion VCMI has created a claims methodology without first specifying or proposing an actual claim. Assessing this methodology without understanding the context in relation to the claim is difficult and significantly decreases clarity. VCMI should clearly state and include the claim in the methodology. Offsetting? VCMI adds to the confusion by suggesting that the Scope 3 Claim will not be used to meet emission reduction targets, but then proposes to allow companies to invest in carbon credits for up to 24% of their target scope 3 emission levels until 2038 in order to bridge the scope 3 "emissions gap"□ between their actual emissions and their trajectory emissions. This would imply that companies can indeed use carbon credits to - at the very least - "address"□ the scope 3 emissions (i.e. value chain emissions) they allegedly cannot abate and can then subsequently advertise their scope 3 "leadership"□ with a VCMI Scope 3 Claim, the specifics of which are unknown. If this is not "offsetting"□, as VCMI asserts, it should clearly explain how this is the case given that carbon credits are being used to "address"□ a company's value chain emissions. Confusion on the concept of "mitigation hierarchy"□ VCMI essentially says that the principle of mitigation hierarchy will be ensured as long as companies comply with the guardrails set forth in Scope 3 Claim methodology. We disagree with this view as the proposed framework allows many companies to heavily rely on the use of carbon credits. In fact, the thresholds were crafted based on the most hard-to-abate sectors, which means that they are inevitably not stringent for many sectors and hence enable companies to get "credit"□ (i.e. visibility) for targets that are less ambitious than they could be. This goes against the logic of the mitigation hierarchy. To remedy this, VCMI should make the thresholds more stringent, and should also ensure that the claims associated with this framework are representative of the fact that it will be used by early movers, not companies that are already making a lot of progress. "Onramp"□ claim? It is unclear whether VCMI considers the Scope 3 Claim as an "onramp"□ claim for companies at the beginning of their decarbonisation trajectories or as a claim that can be used by any company. Given its extremely low ambition, we would hope this claim would be reserved for companies as a "first decarbonisation step"□. VCMI should clearly note what kinds of companies this claim is intended for: companies taking a "first step"□ on their climate journey. Comments about other inherent flaws of the methodology are discussed in the more specific sections. To increase clarity, VCMI should do the following: -Include the actual claim to the above text (which should not imply that credits have been used to "address"□ value chain emissions);	General	Carbon Market Watch

Comments (compiled)	Section of the Claim	Respondent name/ organisation
-Clearly explain how companies using the Scope 3 claim will not be "offsetting"□ their scope 3 emissions and how they are incentivised to continue reducing their emissions rapidly even before 2038; -Respect the reference to mitigation hierarchy being ensured; -Clearly note what kinds of companies this claim is intended for: companies taking a "first step on their climate journey"□.		
We suggest enhancing the readability of the text overall. We recommend restructuring the formatting of lists to improve readability.	General	MSCI
The connection between the final sentence and the rest of the methodology is unclear. We suggest clarifying that once companies have eliminated their Scope 3 emissions gap, they can, or are encouraged to, make a Carbon Integrity Claim. Currently, the final sentence implies that a company must wait until 2038 to make this claim, even if it eliminates the Scope 3 emissions gap earlier. This confusion arises from how the word "then" is used, as it appears to reference 2038 rather than the point at which the company resolves its Scope 3 emissions gap. We recommend stating more clearly, "When a company has eliminated its Scope 3 emissions gap" or "When a company is back on track with its emissions trajectory, it can..." instead of using the phrasing "Companies will, then," This will provide greater clarity and avoid ambiguity regarding the timing of when companies can make a claim.	General	MSCI
We suggest enhancing the readability of the text overall. We recommend restructuring the formatting of lists to improve readability.	General	MSCI Carbon Markets
Clarity on what industry this applies to. Is the assumption that is transferable and relevant to all industries? Furthermore, what type of carbon credits are acceptable (e.g., renewable energy certificates)?	General	Accela Research
1. Clarify why high-quality carbon credits retired to make the claim must cover at least the entirety of the scope 3 emissions gap, which cannot exceed 24% of the scope 3 trajectory emissions included in the target boundary in any given year (a.k.a. "trajectory emissions"). 3. Clarify how the year 2038 was set. 4. Explain how is the target boundary defined and set and its relation to the emissions gap. 5. Provide further clarity on the calculation to be used to identify the percentage of scope 3 emissions that can be mitigated with carbon credits.	General	IETA

Comments (compiled)	Section of the Claim	Respondent name/ organisation
6. Clarify how to measure scope 3 emissions and avoid double claiming across the value chain. 1. A Graph will help to explain the relation between the emission gap, the trajectory emissions and the target boundary, based on Figure 5. 3. It is not clear how this number was set and the implications of having higher or lower years. Also a single year is too rigid and high risk. We recommend a process is put in place to test the usefullness of the mechanism. Ex. Biannual stock take to check aligment with the target. Take account of sector specific and scale (organization size) as well as CBDRs. 4. It is not clear how the target boundary is defined and set? Please explain. 5. The text highlights that carbon credits must cover the entirety (100%) of the emissions gap, but that it can't exceed 24% of the scope 3 trajectory emissions. Without defined distinction between the two, the statement is confusing. 6. As identified by VCMI in their webinar polling, accurate measurement of scope 3 emissions is the biggest challenged faced by corporations. VCMI needs to clarify how to address this issue and overlapping value chains. 1. Include a Graph 3. VCMI will put in place a process to test the usefulness of the mechanism, including biannual stock take to check alignment with the target and take account of sector specific and scale (organization size) as well as CBDRs. 4. Please clarify how target boundaries are set and its relation to the emissions gap. 5. An illustrative example calculating the amount of Scope 3 emissions that can be offset with carbon credits. 6. The Scope 3 Claim is designed to offer a mechanism for companies that are making progress on reducing scopes 1 and 2 emissions, but are struggling to reduce scope 3 emissions due to barriers. One of the biggest barriers to addressing scope 3 emissions is accurate measurement and the overlap of scopes in a value chain for which the company does not have control. Additional clear guidance needs to be provided for better measurement across value chains for all scope emissions which are not owned nor controlled.		
It is unclear what does a Scope 3 claim mean. Will making the claim mean that the company has met the target? Can a claim be made annually? As above	General	Accela Research
The above information as a methodology is very high level. Would conder is more of a description. In broad strokes it is clear but one would not know the actual actions required to complete a Scope 3 Claim.	General	AHDB
Most companies would need sound technical knowledge to fully appreciate the Scope 3 Claim. An overview document, explaining the concepts and benefits of adopting high value carbon offsets as part the Net Zero programme along with the compatibility with the SBTi Net Zero standard. A new high level document.	General	Sopra Steria Group
The average consumer may not realise that the Scope 3 claim requires covering only the gap (i.e. excess scope 3 emissions) with carbon credits, not all remaining (scope 1, 2 and 3) emissions.	General	Perspectives Climate Research

Comments (compiled)	Section of the Claim	Respondent name/ organisation
It is not clear or easy to understand. For a methodology, there is too much explanation and rationale intermixed throughout the methodology and/or guidance language. The document should be more clearly organized with a clearly labeled, succinct methodology, inclusive of graphs and diagrams, and while useful in this draft discussion document, any necessary rationale or explanation should be included elsewhere in the document, in text boxes, footnotes or a separate companion document. Doing so will make it easier to interpret and enable clarity for those implementing the methodology. Further, despite the explanation given by VCMI, the 24% emissions gap threshold seems incredibly arbitrary (as detailed later in our comments). A graph or diagram early in the document explaining the relation between the emission gap, the trajectory emissions, the target boundary, and the carbon credits used would help to clarify significantly. The Scope 3 claim methodology is overly complicated and not clear or easy to understand. Limiting the Scope 3 Claim to companies who are no more than 24% off track from the target trajectory emissions is somewhat complex and not straightforward for the average consumer or public to understand, particularly with regards to determining what the trajectory emissions should be, in comparison to a company's stated targets. The concept of a linear emissions trajectory seems to imply that decarbonization should also be linear, when this is not likely to be the case.	General	Anew Climate
The methodology is clear and easy to understand. No comment	General	TOKYO GAS CO.,LTD.
Text is clear and easy to understand None.	Step 1: Comply with the Foundational Criteria	Invert
We understand that companies are hesitant to set Scope 3 targets due to external dependencies, but the current framework may be too complex to monitor. This complexity risks making the claims irrelevant over time. Futhermore, few companies currently have science-aligned targets, and creating such pathways could be challenging and exclusionary (especially where the trajectory is not expected to be linear). More simply, the framework could be scaled back to consider the basic parameters for the use of offsets to start with, with this adjusted over time, while being mindful of sector-specific needs.	Step 1: Comply with the Foundational Criteria	Accela Research
Text is clear and easy to understand	Step 1: Comply with the Foundational Criteria	IETA
Yes - The scope of this claim is about unabated emissions. the claim would be significantly less confusing if it was simply an unabated emissions claim, it could then include all unabated emissions, making more comparable across sectors.	General	Anonymous
VCMI should also provide a clear format that companies can use in their communications of the claim. VCMI should also provide examples of potential communications statements to help companies using the Scope 3 claim.	General	The Nature Conservancy

6 Carbon credit limit

Comments (compiled)	Section of the Claim	Respondent name/ organisation
See my comments before about my issue with the 24%. I think it is not credible in the target year for them to do this [to retire less than the gap], as they've missed their target. But if they're doing it in interim years because they have some understandable fluctuations (e.g., they switched from diesel to electric fleet and so saw a spike in the emissions in scope 3 capital goods), then this would be more ambitious than SBTi's current standards. The SBTi's potential move towards supplementary alignment targets is a better way of solving this problem in my opinion. See my comments before about my issue with the 24%. I think it is not credible in the target year for them to do this [to retire less than the gap], as they've missed their target. But if they're doing it in interim years because they have some understandable fluctuations (e.g., they switched from diesel to electric fleet and so saw a spike in the emissions in scope 3 capital goods), then this would be more ambitious than SBTi's current standards. The SBTi's potential move towards supplementary alignment targets is a better way of solving this problem in my opinion. See my comments before about my issue with the 24%. I think it is not credible in the target year for them to do this [to retire less than the gap], as they've missed their target. But if they're doing it in interim years because they have some understandable fluctuations (e.g., they switched from diesel to electric fleet and so saw a spike in the emissions in scope 3 capital goods), then this would be more ambitious than SBTi's current standards. The SBTi's potential move towards supplementary alignment targets is a better way of solving this problem in my opinion.	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson

See below (steps 1 and 2). In line with comment on "Scope 3 b)", would consider erasing "or greater than" and add some claim language for when a company retires high integrity credits beyond covering the scope 3 emissions gap limit. Something like: "The volume of high-quality carbon credits retired to make a Scope 3 Claim should be equal to the total gap between their most recently reported scope 3 emissions and their scope 3 emissions indicated by their trajectory for the same year (within the limit established by the guardrail). Any additional retirement would have to be calculated and communicated accordingly..."□.	General	Center for Climate and Energy Solutions
The approach shall allow companies to compensate for some of the gap, at companies discretion. Requiring the volume of carbon credits to fully cover the Scope 3 emissions gap ensures that companies take responsibility for excess emissions, promoting accountability and integrity. This mechanism ensures alignment with science-based pathways while using carbon credits as a supplementary tool for emissions compensation. The guardrail helps prevent over-reliance on credits. · However, some companies may not be able to cover the total gap, so flexibility should be allowed on the threshold set for companies to compensate for some of the gap with carbon credits, provide sufficient public disclosure of reasons.	Option boxes	RWEST
Allowing companies to retire fewer carbon credits than their total emissions gap undermines the integrity of the Scope 3 Claim. While investments in future reductions are important, they do not compensate for current excess emissions and any investments should be done once the present gap has been compensated for. The credibility of the claim relies on fully addressing the present gap with high-quality carbon credits, ensuring accountability while future investments mature. None.	Step 3: Meet the required carbon credit use and quality thresholds	Invert
Requiring the volume of carbon credits to fully cover the Scope 3 emissions gap ensures that companies take responsibility for excess emissions, promoting accountability and integrity. This mechanism ensures alignment with science-based pathways while using carbon credits as a supplementary tool for emissions compensation. The guardrail helps prevent over-reliance on credits.	Step 3: Meet the required carbon credit use and quality thresholds	Invert
The is an opportunity for release fewer emissions and to purchase carbon offsets but one can also inset carbon to reduce the over emissions. Insetting can be an additional tool to reduce the emission gap.	Step 3: Meet the required carbon credit use and quality thresholds	AHDB
This is because supplier engagement can be strengthened by combining investment and carbon credit purchases to reduce Scope 3. No comments	Step 3: Meet the required carbon credit use and quality thresholds	TOKYO GAS CO.,LTD.

Due to company size and budget constraints, it may be difficult to retire the carbon credits equal to the total emissions gap for Scope 3.It is also possible that more companies will be able to make the Scope 3 Claim by giving more flexibility to the amount of carbon credits purchased.	Step 3: Meet the required carbon credit use and quality thresholds	TOKYO GAS CO.,LTD.
We suggest that the logic of a Scope 3 Claim should be clearly defined and communicated. While it is essential for companies to make investments that will facilitate future Scope 3 reductions, this should be addressed through the plans submitted and the reporting of progress towards those plans. Assessing the equivalence of investments for future reductions against "addressing" the current Scope 3 emissions gap through carbon credits would introduce unnecessary complexity to the definition and methodology of a Scope 3 Claim. Additionally, this approach would complicate communication and make it more challenging to compare companies making Scope 3 Claims.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
Requiring high-quality carbon credits in an amount equal to or greater than the emissions gap is preferable and shows greater leadership and commitment to getting back on track. n/a - please see comments above	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate
We strongly support the requirement that the volume of high-quality carbon credits retired to make the Scope 3 claim are equal to or greater than the total emissions gap reported. Carbon credits should be acceptable for addressing all scope 3 emissions n/a - please see comments above	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate
Companies should be using credits to address their full emissions gap on an annual basis.	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon
The VCMI's Scope 3 claim should be a mechanism to ensure that short-term mitigation is not derailed by the existing challenges companies are facing to address their scope 3 emissions. If VCMI were to allow companies to not retire a number of credits equal to the gap, the Scope 3 framework would risk reducing and delaying mitigation. NA NA	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
Companies should take full responsibility for their total emission gap by retiring a volume equal to the size of high-quality carbon credits. This level of retirement would ensure that companies facing Scope 3 challenges do not hinder global climate goals while they get back on track with their climate targets. As previously mentioned, VCMI should clearly state that companies are not required to retire credits beyond their scope 3 gap. VCMI should require that companies retiring credits beyond their gap report those retirements separately from the Scope 3 claim. NA NA	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy

While the gap can be filled by credits, the framework needs to ensure that investments in carbon credits do not displace potential investment in decarbonisation alternatives which will unlock longer term, sustainable emission reduction. As an example, BP has a target to reduce scope 3 production emission of 361 Mt (2019) by 30% by 2030. Offsetting 24% of these emissions (86 Mt) at an assumed credit cost of $20/tonne would cost $1.7 billion annually. An alternative investment to high quality carbon credits could be investment in 2 GW of solar which would longer term impacts on the emissions of BP's portfolio.	Step 3: Meet the required carbon credit use and quality thresholds	Accela Research
As above		
We are sympathetic to the idea that companies can "net" their emissions liabilities using credible removal offsets. This is the whole purpose of the E-ledgers framework we have advocated above, which is consistent with market-based mechanisms for decarbonization. That said, as outlined in previous responses, this objective can scarcely be accomplished using the Scope 3 framework and the existing definitions of carbon offsets, both of which are riddled with conceptual flaws. Please see our responses above. We recommend that the document be wholly revised based on our earlier comments.	Step 3: Meet the required carbon credit use and quality thresholds	E-liability Institute
Requiring a volume equal to or greater to the gap demonstrates a higher level of climate action and leadership. That being said, it's important to remember that the Scope 3 claim is already on top of a Carbon Integrity Claim and therefore the organisation is already committed to ambitious action. No further comments	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
Requiring a volume equal to or greater to the gap demonstrates a higher level of climate action and leadership. That being said, it's important to remember that the Scope 3 claim is already on top of a Carbon Integrity Claim and therefore the organisation is already committed to ambitious action. No further comments	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
We agree with this statement [allowing companies to retire credits lower than the gap] to the extent that it is related to a broader company strategy which invests in a range of mitigation actions that can include but are not limited to carbon credits. Please see the responses to the survey questions.	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch
There is a need to decouple the volume of purchased credits from the volume of remaining emissions. We recommend requiring companies to adopt internal carbon prices and spend the associated budgets on various mitigation actions, including potentially carbon credits. Please see the responses to the survey questions.	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch
The claim should be clear. To us, a clear claim would be that the company has a (limited) emissions gap and it is covering that gap with carbon credits while also taking action to reduce the gap over time. Covering the gap only partially with carbon credits, based on possible future reductions, does not have an equivalent climate benefit to covering the gap fully with carbon credits. No further comments	Step 3: Meet the required carbon credit use and quality thresholds	Perspectives Climate Research

A claim should be clear and understandable. In our view, the scope 3 claim would be clear if it clearly stated that there is a (limited) gap and the company takes responsibility for this gap by buying and retiring (at least) an equivalent amount of carbon credits. No further comments	Step 3: Meet the required carbon credit use and quality thresholds	Perspectives Climate Research
Requiring high-quality carbon credits in an amount equal to or greater than the emissions gap is preferable, and shows greater leadership and commitment to getting back on track. None None	Step 3: Meet the required carbon credit use and quality thresholds	IETA
We support the requirement that the volume of high-quality carbon credits retired to make the Scope 3 claim are equal to or greater than the total emissions gap reported. None None	Step 3: Meet the required carbon credit use and quality thresholds	IETA
It is credible that companies are retiring high-quality carbon credits as well as disclosing their emissions. This should be the minimum criteria to promote corporate adoption of the claim.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonplace
We strongly agree that the volume of high-quality carbon credits retired to make a scope 3 claim should be equal to or greater than the total gap of emissions. This requirement ensures the integrity of the claim and demonstrates a company's commitment to addressing its emissions and further contributing to climate mitigation efforts. By requiring companies to retire a sufficient number of high-quality carbon credits, the VCMI helps to: • Maintain credibility: Ensure that claims are based on verifiable and impactful emissions reductions. • Drive ambition: Encourage companies to set more ambitious emissions reduction targets and take proactive steps to reduce their carbon footprint. • Support climate-positive projects: Redirect financial resources to projects that contribute to climate mitigation and sustainable development. • Promote Net-negative targets and addressing historical emissions. This requirement is essential for building demand and trust in the carbon market and ensuring that carbon credits are used effectively to address climate change.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonplace
If you want to make credits count toward a decarbonization target that has not been met, then the whole gap should be covered, else the 'netting out would not make sense.	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions

As per early comment in "Scope 3 Claim, b)"□ and "Calculate Scope 3 emission gap d)"□ consider erasing "or greater than"□ and add language for when excess credits are purchased for scope 3 and possibly other scopes (if not making a different claim altogether). As per early comment in "Scope 3 Claim, b)"□ and "Calculate Scope 3 emission gap d)"□ consider erasing "or greater than"□ and add language for when excess credits are purchased for scope 3 and possibly other scopes (if not making a different claim altogether).	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
It is difficult to know how to respond to this statement since the commitment to invest in future scope 3 absolute emissions reduction is not time bound nor is there a quantitative requirement that the investment exceed the value of the retired high quality carbon credits over the time period of the science based contrct commitment.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy
they should not be able to make any claims in this case [retiring credits at an amount lower than the gap]	Step 3: Meet the required carbon credit use and quality thresholds	ClimatePartner
should be the minimum requirement	Step 3: Meet the required carbon credit use and quality thresholds	ClimatePartner
The credits amount should be equal to or greater to the emissions gap, thus requiring companies to provide for immediate financial alignment where barriers for directly reducing scope 3 are present in the near term.	Step 3: Meet the required carbon credit use and quality thresholds	Conservation International
Strongly encourage companies to also use credits towards the other unabated emissions, not just to bring themselves back on track. That will form the bulk of all emissions and it would be a missed climate opportunity.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
1. Credit use beyond emissions gap It is clear that the Scope 3 Claim framework is chiefly concerned with companies taking responsibility for their scope 3 emissions gap while they reduce their emissions in line with their target trajectory. However, there is consistent reference to retiring credits "at least"□ equal to the emissions gap, indicating that the Scope 3 Claim is intended for addressing more than just the gap, i.e. the emissions that are within the target trajectory. However, the Scope 3 Claim document is quite silent on this aspect.	Step 3: Meet the required carbon credit use and quality thresholds	FincoEnergies

Therefore for clarity, FincoEnergies suggests VCMI explicitly address this matter by providing unambiguous guidance in a dedicated section of the document.		
VCMI should also clearly state that companies need not retire credits beyond their Scope 3 gap, but that to not derail global mitigation, they must not retire less credits than the volume of their gap. VCMI could also suggest that instead of making investments beyond their scope 3 gap, companies should be investing in addressing their scope 3 challenges.	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
Why high-quality carbon credits retired to make the claim must cover only the entirety of the scope 3 emissions gap and not the entire scope 3 emissions. The message would be stronger and clearer with a more ambitious target. Provide a clearer ambition and what does it mean in terms of claim value.	General	BURN manufacturing
The statement regarding carbon credits—“credits retired to make the claim must cover at least the entirety of the Scope 3 emissions gap”—may cause confusion, particularly since it is later specified that the gap can only be 24% or less. This phrasing suggests that companies might need to utilize more credits than necessary to address the Scope 3 gap to comply with the methodology. As this aspect is not a core component of the methodology, the use of "at least" here could lead to misunderstanding and should be reconsidered for clarity. We suggest removing "at least" from the phrase "at least the entirety of the Scope 3 emissions gap" to more clearly communicate the minimum requirements for making a claim.	General	MSCI
VCMI should clearly state that companies are not required to compensate for emissions beyond their gap. In fact, VCMI should suggest that companies do not retire credits beyond their gap as the financial resources should be spent in addressing the challenges of closing their Scope 3 gap internally. Therefore, we recommend that the language changes from " at least the entirety of the scope 3 emissions gap" to "equal to the entirety of the scope 3 emissions gap". If companies are still interested in retiring credits beyond their gap, they should report those retirements separately from the Scope 3 claim retirements. NA "At least" should be updated to "equal to" with a follow up statement of "If companies desire to invest in credits greater to their scope 3 emissions gap, this would be considered BVCM and is detailed in X guidance" Moreover, a better way to phrase the deadline cutoff could be "The Scope 3 claim will no longer be a usable VCMI claim starting January 1, 2038. At that point, it will be expected that companies have eliminated their scope 3 emissions gap to get back on an emissions trajectory consistent with their net zero transition commitments."	General	The Nature Conservancy
Due to company size and budget constraints, it may be difficult to retire the carbon credits equal to the total emissions gap for Scope 3.It is also possible that more companies will be able to make the Scope 3 Claim by giving more flexibility to the amount	Step 3: Meet the required carbon	TOKYO GAS CO.,LTD.

of carbon credits purchased.	credit use and quality thresholds	
FincoEnergies supports the requirement of a company needing to retire at least enough credits to address their scope 3 emissions trajectory gap. This requirement supports companies taking responsibility for the gap, it puts an internal price on these emissions to further motivate reduction actions, and supports the wider scale up of investment in climate action.	Step 3: Meet the required carbon credit use and quality thresholds	FincoEnergies
Though it is a Scope 3 requirement, companies are not required to compensate for their Scope 1 and 2 emissions. They just need to show that they are making progress. We should encourage companies to use carbon credits towards their emissions (i.e. 100%) not just the part that they have exceeded (i.e. 24%). [Note: Our understanding is that companies that have missed their targets cannot make a Carbon Integrity Claim.] Add a requirement for companies to report on the use of carbon credits towards the other unabated emissions.	General	Anonymous

7 Editorial

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The diagrams and example calculations are critical to making the methodology more clear, since the methodology initially seems quite confusing to the reader. However, the diagrams could be significantly improved for clarity (see recommendations next section). In final version of the methodology, consider including this in an example or case study box or alternatively an appendix with very clear cross references on where to find it. Ultimately, the methodology shouldnt have the examples directly imbedded. All figures in this section need to more clearly distinguish actual emissions from target emissions, with better labeling and colors.	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate
In regard to general feedback on the document as a whole, we wish to comment on the language and would urge the authors to utilize more prescriptive language (i.e. "You shall, underscoring the mandatory nature of the guidance of the claim.	General	Anonymous
a potential challenge is that relying on carbon credits""even high-quality ones can be perceived as offsetting instead of reducing emissions at the source. It's important to ensure that companies do not rely too heavily on this mechanism and still prioritize internal reductions. The framework could clarify the balance between emissions reductions and offsets. Clarify the balance between emissions reductions and offsets.	General	Hatem Ali
The text rightly emphasizes the "emissions trajectory" in line with net-zero targets it could further detail how companies should prioritize internal efforts before relying on carbon credits, which are often seen as a temporary solution rather than a sustainable reduction path.	General	Hatem Ali
preface all mentions of "carbon credits" with "high quality" throughout the text.	Option boxes	Institute for Agriculture and Trade Policy
3. tonne (metric) should be used, not ton (imperial) 3. Change ton to tonne.	General	IETA

As per early comment in "Scope 3 Claim, b)"□ and "Calculate Scope 3 emission gap d)"□ consider erasing "or greater than"□ and add language for when excess credits are purchased for scope 3 and possibly other scopes (if not making a different claim altogether).	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
preface "emissions" with absolute [related to - "CHECK IF SCOPE 3 EMISSIONS GAP IS GREATER OR LESS THAN 24% OF SCOPE 3 EMISSIONS TRAJECTORY To apply the guardrail that the scope 3 emissions gap must not exceed 24% of a company's scope 3 trajectory emissions included in the target boundary in the year it is making the claim, companies should apply Equation 3."	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy
Tonne (metric) should be used, not ton (imperial). Change ton to tonne.	General	Invert
The definition of the 'companys Scope 3 emissions gap' (a central concept of the initiative) should be clearly outlined at the beginning of this document, as currently, the reader must search for this information in subsequent sections. It is advisable to include an initial Glossary with key terms to facilitate an understanding of the initiative's rules from the outset.	General	Carbonext
Avoid negative narrative (failing; not achieving enough ...)	General	WBCSD - The NCS Alliance
Clarify what the "claim" is going to be (is this a compensation or contribution claim) especially in comparison to a company that is on track (what can the latter say about being on track?)	General	WBCSD - The NCS Alliance
What could be better explained? The average consumer may not realise that the Scope 3 claim requires covering only the gap (i.e. excess scope 3 emissions) with carbon credits, not all remaining (scope 1, 2 and 3) emissions. There is no incentive for the company to buy more than the gap amount, since covering a higher share of remaining emissions doesn't currently enable making a higher-tier claim (similar to Carbon Integrity Claims). The term "emissions gap"□ is already common from the UNEP emissions gap report. This is why we propose that VCMI considers referring to "abatement gap"□ instead of "emissions gap"□.	General	Perspectives Climate Research
The four step process to make a Scope 3 claim, as outlined in Figure 2 is clear and easy to understand. Why VCMI has chosen to Mission Possible Pathways data from companies that may or may not have committed to science based emissions reduction targets is not clear. Since the 24% ceiling for the use of high quality credits is derived from the MPP data, explaining the methodological choice to use data from companies that may not have made science based target commitments is a crucial transparency measure. The text should state throughout the emissions reduction objective concerns "absolutre emissions" and not emissions intensity, a construct that could allow companies to make a Scope 3 claim while increasing their absolute emissions. use "absolute emissions" throughout the text	General	Institute for Agriculture and Trade Policy

The last portion of the text could be rephrased as: High-quality carbon credits retired to make the claim in any given year must cover [consider deleting "at least"□ and add more language to the claim for when excess credits retired] the entirety of the scope 3 emissions gap. This gap cannot exceed 24% of the scope 3 science-based and net- zero pathway-aligned emissions, consistent with both near and long-term net-zero commitments in any given year, that is, 24% of scope 3 trajectory emissions.	General	Center for Climate and Energy Solutions
for editorial clarity demonstrate that net zero committed corporations are . . . .near term absolute emissions reduction target	Step 1: Comply with the Foundational Criteria	Institute for Agriculture and Trade Policy
Scope 1 and 2 publicly disclosed need to be third party/independently verified. Publicly disclose the percentage of emissions reductions achieved in GHG emissions for scope 1 plus scope 2 ' to Publicly disclose independently verified the percentage of emissions reductions achieved in GHG emissions for scope 1 plus scope 2 '.	Step 2: Meet the Scope 3 Claim requirements	Sopra Steria Group

8 Establishing a scope 3 emissions trajectory

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Scope 3 emissions are double counted across multiple companies' GHG emissions inventories and targets. Scope 3 emissions reporting leads to multiple counting of the same GHG emissions across companies and across the economy. An overlap in scope 3 reporting and target-setting across companies makes it exceedingly difficult for companies to set a precise, science-aligned scope 3 reduction target. Additionally, the prevalence of double counting means that the same emissions will be included across multiple companies' scope 1, 2 and 3 targets, resulting in a duplication of efforts where multiple companies may be working to reduce the same GHG emissions.	Step 2: Meet the Scope 3 Claim requirements	American Petroleum Institute
the text could provide clearer guidance on how to manage such variations. For instance, companies may need more detail on how to justify non-linear trajectories or document the specific external factors causing these deviations.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
It would be useful to include real-world examples of companies managing non-linear trajectories while staying aligned with IPCC pathways. This would give practical insight into how the flexibility is applied in practice.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
it could better explain why a linear approach is considered the standard and how it aligns with the IPCC's nearly linear projection for global emissions reduction. This explanation would add credibility to the use of a linear assumption and prevent confusion, especially for companies not familiar with the science-based frameworks.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
Companies in certain industries (e.g., energy, heavy manufacturing) may have particularly complex emissions profiles, making a linear trajectory difficult to apply. Offering sector-specific guidance or examples on how these companies can align their emissions reductions with science-based targets would enhance the flexibility of the methodology.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali

Additionally, companies dealing with substantial year-on-year fluctuations in emissions due to acquisitions or market changes would benefit from guidance on how to adjust their target trajectory in such cases.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
If companies do not provide their own science-aligned emissions trajectory for the claim year, a linear trajectory - between their base year and target year - can be assumed by the company and provided by them > does that mean that companies are allowed to not disclose their progress on a given year and assume that they're a linear trajectory? This sounds like any easy way out for companies. -	Step 3: Meet the required carbon credit use and quality thresholds	Marine Klobut
Given SBTi does not require linear reduction, I guess my question is why would a company choose to make a VCMI scope 3 claim in interim years when they could just make it in the year their target is missed?	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson
Ensures that the company is committing to an equal cumulative reduction target under both methods.	Step 3: Meet the required carbon credit use and quality thresholds	Invert
Agree with the principle but what is actually happening in reality outside of the modelling? Is there a risk that this demand leads to false values?	Step 3: Meet the required carbon credit use and quality thresholds	AHDB
This is because various pathways should be recognised.	Step 3: Meet the required carbon credit use and quality thresholds	TOKYO GAS CO.,LTD.
FincoEnergies supports VCMI in designing its Scope 3 Claim framework to align with IPCC mitigation pathways, such as this trajectory requirement.	Step 3: Meet the required carbon	FincoEnergies

	credit use and quality thresholds	
We suggest employing non-linear trajectories to account for specific circumstances.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
While yes, it is important to ensure equal cumulative reduction targets under both methods, how exactly this would be calculated is unclear and additional guidance would be useful. A cumulative under the curve approach is better because it allows flexibility over time and does not dictate a time specific answer. Companies should have maximum flexibility to set reasonable non-linear trajectories, if that better reflects their decarbonization strategy. n/a - please see comments above	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate
While yes, it is important to ensure equal cumulative reduction targets under both methods, how exactly this would be calculated is unclear and additional guidance would be useful. A cumulative under the curve approach is better because it allows flexibility over time and does not dictate a time specific answer. Companies should have maximum flexibility to set reasonable non-linear trajectories, if that better reflects their decarbonization strategy.	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon
The VCMI should provide companies with the option to use the flexible cumulative emissions approach recognizing that emissions will fluctuate year to year. See more in Carbon Budget question.	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
Few companies currently have science-aligned targets, and creating such pathways could be challenging and exclusionary for some sectors. Basic parameters for the use of offsets should be established and adjusted over time, being mindful of sector-specific needs. As above	Step 3: Meet the required carbon credit use and quality thresholds	Accela Research
This statement oversimplifies the complex nature of emissions trajectories and reduction pathways. While aligning with a science-based outcome is crucial, forcing companies to adhere to a linear trajectory could impose unnecessary constraints that fail to account for sector-specific realities, technological advancements, or market dynamics. In fact, it is absurd to assert that a linear trajectory is science-aligned - how so? Many industries experience non-linear progress in emissions reductions, particularly as breakthroughs in technology, supply chain shifts, or operational efficiencies may take time to materialize but result in steeper	Step 3: Meet the required carbon credit use and	E-liability Institute

reductions later in the pathway. Furthermore, a cumulative emissions cap based on a linear pathway may be at odds with the flexibility needed for companies to deploy resources strategically and pursue transformative investments that deliver sustained reductions. Companies should instead be held to rigorous, real-time accounting standards""such as the E-liability approach""to ensure transparency and accuracy in emissions reporting, while allowing for non-linear, yet science-aligned, reduction pathways that lead to net-zero outcomes. Thus, the focus should be on accurate measurement and verifiable reductions across the lifecycle of emissions, rather than strictly adhering to arbitrarily linear paths. Please see our responses above. We recommend that the document be wholly revised based on our earlier comments.	quality thresholds	
See comment later in feedback.A cumulative under the curve approach is better because it allows flexibility over time and does not dictate a time specific answer. No further comments	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
We support enabling non-linear trajectories since they offer flexibility and reflect reality. The risk that companies make claims only on the higher-than average years can be reduced as proposed by VCMI. No further comments	Step 3: Meet the required carbon credit use and quality thresholds	Perspectives Climate Research
Disclosure of the comparative calculations should promote flexibility in target setting and pathways to NetZero.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonplace
The integration of the pathways would need to yield the same GHG absolute budget.	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
If a company develops an IAM based non-linear absolute emissions trajectory, if should not be forced to delete or adjust IAM factors to be consistente with a hypothetical linear pathway that may or may not be consistent with IPCC pathways.	Step 3: Meet the required carbon credit use and	Institute for Agriculture and Trade Policy

	quality thresholds	
If the justification for the maximum of 25% emissions gap based on SBTI's sectoral pathway trajectory it is logical to target science-aligned outcomes regardless of whether the cumulative emissions resulted from linear or non-linear trajectory.	Step 3: Meet the required carbon credit use and quality thresholds	Conservation International
The methodology is adequate for a company that has the resources to pursue scope 3 emissions reduction targets. Kindly take note of the previous comment addressing the possibility to make the term "emissions trajectory" cleared and more accessible. On the company data, the proposed calculation methodology is logical, and seems to reflect accurate implementation potential. The calculation methodology incorporates all relevant metrics that a company would need to adequately manage their scope 3 emissions. As acknowledged on various occasions throughout this submission, we suggest a better framing of the terms "target boundary" and "emissions trajectory".	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
Establish a scope 3 Emissions Trajectory There is a possibility that some companies may choose not to maximize their forecast emission reduction efforts in order to maintain a significant amount of emissions in Scope 3 that they can offset without exceeding the 24% gap limit. This behavior might be driven by a desire to avoid excessive pressure to quickly reduce internal emissions, as doing so could require substantial investments in new technologies or significant operational changes. In other words, the company may opt to set fewer compromises to reduce emissions now, keeping them within a comfortable margin in relation to the 24% gap limit.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonext
General Questions There is a lack of accessible methodologies (SBTi is too expensive) and clear frameworks that standardize the publication of action plans, timelines, expenditures, baseline year definition, and reductions.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonext
Companies should set targets for emission reductions in Scope 3, and this should be set with a net zero trajectory as the basis. A Scope 3 emission trajectory should not be used to calculate the predicted gap between actual emissions and the targets, to then be used to calculate the amount of carbon credits the company can purchase.	Step 3: Meet the required carbon credit use and quality thresholds	ECOS

No Comments.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
Recommend only including language around companies determining a scope 3 emissions trajectory with their science-aligned target. Whether that trajectory is linear or not depends highly on individual company circumstances.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
We have no specific comments on this section.	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon
Few companies currently have science-aligned targets, and creating such pathways could be challenging and exclusionary. Basic parameters for the use of offsets should be established and adjusted over time, being mindful of sector-specific needs.	Step 3: Meet the required carbon credit use and quality thresholds	Accela Research
As outlined in previous responses, the current Scope 3 approach is unworkable. We recommend that the document be revised on the basis described in our answers above.	Step 3: Meet the required carbon credit use and quality thresholds	E-liability Institute
OK, none. None.	Step 3: Meet the required carbon credit use and quality thresholds	Sopra Steria Group

We support the approach taken for determining trajectories	Step 3: Meet the required carbon credit use and quality thresholds	Drax
Companies should be allowed leeway to set their trajectories. In any year, all three scope emissions can vary dramatically depending on the projects being undertaken for emission reductions, corporate portfolio changes and the success of emission reduction efforts and thus do not fit well with a straight-line reduction in emissions over time. Likewise, it is rare for emissions to follow a straight-line reduction in any case, but rather they tend to make step changes as new technologies are developed and introduced. While it is important to ensure equal cumulative reduction targets under both methods, how exactly this would be calculated is unclear and additional guidance would be useful. A cumulative under the curve approach is better because it allows flexibility over time and does not dictate a time specific answer. Companies should have maximum flexibility to set reasonable non-linear trajectories, if that better reflects their decarbonization strategy. Delete text on linear trajectories and replace by: "Companies should determine a scope 3 emissions trajectory consistent with their science-aligned target." This should be the only requirement.	Step 3: Meet the required carbon credit use and quality thresholds	IETA
A linear trajectory should be seen as the base entry point. This enables a corporate to participate early, to recognise the ambition and to begin to monitor cumulative emissions above the target trajectory.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonplace
We support the outlined methodology. No recommended changes besides making it explicit that trajectory elements should be embedded in a transition plan with sufficient interim targets to establish a trajectory.	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
It is very unlikely that company emissions will follow a linear model over the time period of the target boundary. However, companies have some control over at least some of the factors that the text states are beyond company control. The IPCC emissions trajectories depend on the selection and application of Integrated Assessment Models (p. 8 , https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15_Chapter2_Low_Res.pdf) . Companies should develop their own IAMs to develop an emissions target pathway over the period of their target boundary.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy

9 Differentiation (by sector or otherwise)

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Scope 3 emissions targets are especially challenging for oil and natural gas companies, given the sector's emissions profile and demand for their products. The oil and natural gas sector is actively working to reduce scope 3 emissions through a variety of pathways. Oil and natural gas companies are incorporating sustainability criteria into supplier decisions and engaging with suppliers to support supply chain GHG emissions reductions. On the demand side, many companies with downstream operations are working to produce low-carbon fuels to reduce downstream scope 3 emissions while also considering continued consumer demand for oil and natural gas. However, setting and achieving scope 3 reduction targets is particularly challenging for the oil and natural gas industry, as 80-95% of value chain GHG emissions result from customers' use of their sold products.3 API appreciates VCMI's consideration of hard-to-abate sectors in their development of the Scope 3 Claim, however we note that the oil and natural gas sector is not included in the Mission Possible Pathways data used to set the 24% limit on carbon credit use required in the Scope 3 Claim. The seven hard-to-abate sectors that were considered – aviation, trucking, shipping, steel, aluminum, concrete, and chemicals – are all customers of oil and natural gas companies. Their hard-to-abate scope 1 emissions include the scope 3 emissions of the oil and natural gas sector from the use of sold products. Requiring oil and natural gas companies to develop scope 3 emissions targets and limiting the permitted use of high-integrity carbon credits to meet such targets is a misaligned approach that does not adequately consider the continued demand for their products. Such an approach solely works to limit energy production without addressing impacts on the availability of reliable, affordable energy. We urge VCMI to consider the nuance of the oil and natural gas sector's scope 3 emissions as they continue the development of their claims framework and recognize that the same emissions will be covered (and mitigated or offset) across multiple companies' scope 1, 2 and 3 inventories. API appreciates VCMI's recognition of the challenges to establish and meet precise scope 3 emissions targets, the flexibility needed for companies to address these barriers, and the ability of high-integrity carbon credits to meaningfully contribute to international climate goals. We are eager to continue engaging with VCMI on the development of their claims system and look forward to further collaboration. References: 3 "Few oil and gas companies commit to Scope 3 net zero emissions as significant challenges remain", Wood Mackenzie, (October 2022), https://www.woodmac.com/press-releases/few-oil-and-gas-companies-commit-to-scope-3-net-zero-emissions-as-significant-challenges-remain/.	Step 3: Meet the required carbon credit use and quality thresholds	American Petroleum Institute

Comments (compiled)	Section of the Claim	Respondent name/ organisation
This is not actually a scope 3 claim, this is a claim about unabated emissions and taking responsibility for some of them whilst you try to get back on track. as this claim is about unabated emissions, it would make more sense to make this for all unabated emissions, not just scope 3. the reason being that in some sectors (such as flag) companies have an average of only 5% of emissions across scopes 1 and 2, with 95% being scope 3 and others like built environment can have up to 40% as scopes 1 and 2 with 60% being scope 3. being 24% off track in. scope 3 but on track in scope 2 is very different in those scenarios. in the example above, a cement company could be tackling up to a huge percentage of their emissions, but off track in scope 1 due to implementation times, and not qualify yet a flag company could be doing very little for 95% of their emissions and still qualify, thereby making the claim in comparable across sectors and misleading.	General	Anonymous
"which cannot exceed 24% of the scope 3 trajectory emissions". For the next version of the paper, not for this one, it could be useful to link this number to the specific sector. There are hard to abate sectors, like aviation, where is clear now that Net Zero 2050 will not be possible, and the carbon removal will be needed for 50-60% of total emissions in 2050 (last DNV 2024 Outlook energy report, and probably IEA next report).	General	Ruggero Poli
We argue that the 2038 phase-out date is inappropriate for all sectors and that appropriate phase-out dates should be applied to specific hard-to-abate sectors, while sectors that are easier to decarbonize should not be allowed to participate in the Scope 3 Claim. The VCMI 2038 phase-out date is based on mitigation pathways data showing that only extremely hard-to-abate sectors (trucking, aviation, and shipping) will not be on a Paris Agreement compatible pathway by 2038. However, this data shows that other sectors could reach pathways compatible with Paris Agreement trajectories much sooner (e.g. aluminum in 2031, chemicals in 2033, steel in 2033, and cement in 2037). Therefore, we recommend that phase out dates for trucking, aviation and shipping should be 2038. Aluminum, chemicals, steel, and cement should have 2031, 2033, 2033, and 2037 phase out dates, respectively. All other sectors should be required to have a much earlier phase out date than 2038 or not be allowed to make the scope 3 claim	Step 3: Meet the required carbon credit use and quality thresholds	Libby Blanchard
The 2038 phase-out date is inappropriate for all sectors. Appropriate phase-out dates should be applied to specific hard-to-abate sectors, while sectors that are easier to decarbonize should not be allowed to participate in the Scope 3 Claim. The VCMI 2038 phase-out date is based on mitigation pathways data showing that only extremely hard-to-abate sectors (trucking, aviation, and shipping) will not be on a Paris Agreement compatible pathway by 2038. However, this data shows that other sectors could reach pathways compatible with Paris Agreement trajectories much sooner (e.g. aluminum in 2031, chemicals in 2033, steel in 2033, and cement in 2037). Therefore, we recommend that phase out dates for trucking, aviation and shipping should be 2038. Aluminum, chemicals, steel, and cement should have 2031, 2033, 2033, and 2037 phase out dates, respectively. All other sectors should be required to have a much earlier phase out date than 2038 or not be allowed to make the scope 3 claim.	Step 3: Meet the required carbon credit use and quality thresholds	Libby Blanchard

Comments (compiled)	Section of the Claim	Respondent name/ organisation
1. The Core methodology for the Claim 1.2 Sector-Specific Adjustments The complexity of reducing Scope 3 emissions is widely recognized, especially in harder-to-abate sectors (e.g., steel, cement, aviation). Tailoring requirements to different sectors ensures that decarbonization targets are ambitious but achievable.	General	Seagrass Ltd
As stated previously, VCMI should implement sector-specific guardrails, meaning that VCMI may need to provide more flexibility for industries with emission gaps wider than 24%. In other words, VCMI should set caps on the permissible Scope 3 gap by sector. Companies exceding that sector-specific limit should not be eligible for a Scope 3 claim. ALL companies should be required to use a number of credits equal to their emission gap to ensure that companies are taking full responsibility for all their emissions and to not delay short-term mitigation or risk the achievement of global climate goals. Require companies to compensate for the whole extent of their emission gaps.	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
To better balance the rigour and flexibility that companies need, VCMI should allow companies to use credits to neutralize all non-readily abatable emissions. Given that making this assessment by VCMI or the individiual companies will take in-depth work, VCMI should in the meantime make its credit use limit and deadline cutoff year sector specific.	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
The explanation is clear enough. Our objections are to some elements of the approach. See comments about the text below. The 2038 phaseout date does not account for variable adoption curves of green technologies Our second critique of the 2038 phase-out date is the same as our points on the 24% cap above: it is derived from a data analysis that makes too many simplifying assumptions about the ability of companies across an array of sectors and geographies to decarbonize. We want to highlight a particularly salient issue that makes choosing a single, economy-wide phaseout date challenging: variable adoption curves of new technologies. The idea behind adoption curves is simple: the early stages of green technology markets are dominated by pioneering adopters willing to pay the high costs for new emerging technologies. As different approaches reach commercial scale, they lower production costs, giving access to a larger swath of the market. The phenomenon played out in the early days of the solar market and is now seen in carbon direct removal (CDR). Most CDR approaches are still high up the cost curve, limiting demand to those buyers willing to pay high costs to boost the market. The challenge is that, much like emissions pathways, the trajectory of these cost curves can be quite variable across different technologies, regions, etc. Figure 1 illustrates this concept. In this case, the cost of an emerging green technology starts similar across several regions but diverges over time based on production capacity and delivery logistics. This is a theoretical example, but it mirrors what we might expect with other decarbonization technologies, where adoption will depend heavily on proximity to feedstock supply chains and production hubs. Figure 1: An example of variable adoption curves, for a green technology in four different geographic areas. Note that areas 1 & 2	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
start off around the same cost, but the technology comes down the cost curve more rapidly in region 2. Region 1 would face a much higher cost barrier, making near-term adoption more challenging. If this is the case, companies in different sectors and regions cannot be expected to abide by a universal phaseout date. This is again a place where more sophisticated modeling could help, but in the absence of that, companies should be able to set phaseout dates according to their trajectories. Requiring continued progress on reducing the need for credits to address Scope 3 emissions and setting a maximum phaseout date of 2050 would align the Scope 3 Claim with the recommendations of the Oxford Offsetting Principles. We recommend restructuring the methodology to incorporate the elements outlined above.		
VCMI shall provide an inclusive and flexible approach in terms of the year to overcome barrier for abating scope 3 emissions, allowing for sector specific and outliers considerations and extension of the timeframe. Provide an inclusive approach to allow all companies benefit from the approach and clarify why the top 25% companies with the largest gaps are excluded from the possibility of making a Scope 3 Claim. Basing the analysis on only one study can introduce bias in the analysis. The 24% amount seems to be set by an average of a theoretical pathway for a select group of hard to abate industries. The pathways for the selected industries are theoretical as each of them relies on an unrealistic amount of renewable power and grid connections, which collectively will not be available. It ignores the hard to abate industries like oil and gas and industries which are above the average. Thus we suggest the percentage needs to be sector specific and re-evaluated should the collective targets still not be achieved in the future. VCMI shall provide flexibility in terms of the scope 3 gap limit to overcome barrier for abating scope 3 emissions, allowing for sector specific considerations and a step-wise approach that allow re-evaluation of the gap over time. Moreover, basing the analysis on only seven-hard to abate sector is not representative for all sectors. The 2038 timeline may be feasible for some sectors, especially those that are already making progress on decarbonization or that operate in less carbon-intensive industries. However, for hard-to-abate sectors and companies with complex global supply chains, fully addressing Scope 3 emissions by 2038 may prove more challenging. These companies might need more time or greater external support to meet this ambitious target. Consequently, sector specific considerations may be required.	Step 3: Meet the required carbon credit use and quality thresholds	RWEST
2. Clarify how the 24% threshold was set. 2. The 24% amount seems to be set by an average of a theoretical pathway for a select group of hard to abate industries. The pathways for the selected industries are theoretical as each of them relies on an unrealisitc amount of renewable power and grid connections, which collectively will not be available. It ignores the hard to abate industries like oil and gas and industries which are above the average. Thus we suggest the percentage needs to be sector specific and re-evaluated should the collective targets still not be achieved in the future. 2. The percentage needs to be sector specific and re-evaluated should the collective targets still not be achieved in the future.	Step 3: Meet the required carbon credit use and quality thresholds	IETA
The 2038 timeline may be feasible for some sectors, especially those that are already making progress on decarbonization or that operate in less carbon-intensive industries. However, for hard-to-abate sectors and companies with complex global supply chains,	Step 3: Meet the required carbon	Invert

Comments (compiled)	Section of the Claim	Respondent name/ organisation
fully addressing Scope 3 emissions by 2038 may prove more challenging. These companies might need more time or greater external support to meet this ambitious target. A more flexible approach, perhaps sector-specific, would acknowledge that some industries may need longer to address Scope 3 barriers, while other sectors should be expected to meet the target sooner.	credit use and quality thresholds	
The 24% limit likely excludes some companies making genuine efforts but struggling due to the complexity and cost of reducing Scope 3 reductions in their value chains. That limit was also derived from an average pathway for hard to abate sectors; we recommend incorporating sector-specific considerations.	Step 2: Meet the Scope 3 Claim requirements	Anonymous
The 2038 phaseout date does not account for variable adoption curves of green technologies Our second critique of the 2038 phase-out date is the same as our points on the 24% cap above: it is derived from a data analysis that makes too many simplifying assumptions about the ability of companies across an array of sectors and geographies to decarbonize. We want to highlight a particularly salient issue that makes choosing a single, economy-wide phaseout date challenging: variable adoption curves of new technologies. The idea behind adoption curves is simple: the early stages of green technology markets are dominated by pioneering adopters willing to pay the high costs for new emerging technologies. As different approaches reach commercial scale, they lower production costs, giving access to a larger swath of the market. The phenomenon played out in the early days of the solar market and is now seen in carbon direct removal (CDR). Most CDR approaches are still high up the cost curve, limiting demand to those buyers willing to pay high costs to boost the market. The challenge is that, much like emissions pathways, the trajectory of these cost curves can be quite variable across different technologies, regions, etc. Figure 1 illustrates this concept. In this case, the cost of an emerging green technology starts similar across several regions but diverges over time based on production capacity and delivery logistics. This is a theoretical example, but it mirrors what we might expect with other decarbonization technologies, where adoption will depend heavily on proximity to feedstock supply chains and production hubs. Figure 1: An example of variable adoption curves, for a green technology in four different geographic areas. Note that areas 1 & 2 start off around the same cost, but the technology comes down the cost curve more rapidly in region 2. Region 1 would face a much higher cost barrier, making near-term adoption more challenging. If this is the case, companies in different sectors and regions cannot be expected to abide by a universal phaseout date. This is	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
again a place where more sophisticated modeling could help, but in the absence of that, companies should be able to set phaseout dates according to their trajectories. Requiring continued progress on reducing the need for credits to address Scope 3 emissions and setting a maximum phaseout date of 2050 would align the Scope 3 Claim with the recommendations of the Oxford Offsetting Principles.		
As discussed above, we think companies should be given much more flexibility in setting caps on credit use and phaseout dates. There are simply too many companies in too many parts of the world that are lagging behind on adoption of green technologies to use a "one size fits all" approach. We would support VCMI in developing a more nuanced set of guardrails that can apply to different sectors and geographies. But without the ability to do that, we think it would be a mistake to prescribe these specific guardrails.	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon
The hard to abate sectors are the ones where some leeway should be allowed because the implementation of their respective decarbonisation pathways is challenging today, with today's technologies and prices. For the other sectors, 24% is very generous. I'm not convinced that an MPP paper has sufficient scientific credibility to make it the basis of a standard like the VCMI's. I disagree with taking what's been designed for hard to abate and extend it to the entire economy. This has no scientific ground: you're basing your standard on an MPP paper, rather than IPCC or other equally reputable scientific organisations. The non hard to abate sectors shouldn't have such a large allowance, 24% is not in line withe science. Non hard to abate sectors should have a lower threshold.	Step 3: Meet the required carbon credit use and quality thresholds	Mundys
VCMI should allow companies to use credits to cover all of the non-readily abatable emissions in their emission gap, which are the emissions that a company does NOT have a sufficient level of information or control or that the abatement cost is prohibitive. The proportion of non-readily abatable emissions in a Scope 3 gap will vary accross sectors or industries, so a blanket 24% cap may	Step 3: Meet the required carbon credit use and	The Nature Conservancy

Comments (compiled)	Section of the Claim	Respondent name/ organisation
not be sufficiently flexible or restrictive. VCMI should provide sector-specific guardrails, which should be updated as research starts better identifying individual sector needs. VCMI could also provide a framework for companies to individually assess how many of their emissions are readily and non-readily abatable. This framework should be verifiable. However, recognizing that the sectoral analysis or the individual assessment framework will take significant time and effort on VCMI's part and that VCMI and Accenture already developed a preliminary analysis that resulted in the 24% limit, TNC accepts an interim 24% safeguard as long as VCMI clearly states that sector/company-specific approaches will be developed in the first few years of the claim. VCMI should also ensure that future analyses include sectors not included in Accenture's analysis, such as the land sector.	quality thresholds	
· VCMI shall provide an inclusive and flexible approach in terms of the year to overcome barrier for abating scope 3 emissions, allowing for sector specific and outliers considerations and extension of the timeframe. Provide an inclusive approach to allow all companies benefit from the approach and clarify why the top 25% companies with the largest gaps are excluded from the possibility of making a Scope 3 Claim. Basing the analysis on only one study can introduce bias in the analysis. · The 24% amount seems to be set by an average of a theoretical pathway for a select group of hard to abate industries. The pathways for the selected industries are theoretical as each of them relies on an unrealistic amount of renewable power and grid connections, which collectively will not be available. It ignores the hard to abate industries like oil and gas and industries which are above the average. Thus we suggest the percentage needs to be sector specific and re-evaluated should the collective targets still not be achieved in the future. VCMI shall provide flexibility in terms of the scope 3 gap limit to overcome barrier for abating scope 3 emissions, allowing for sector specific considerations and a step-wise approach that allow re-evaluation of the gap over time. · Moreover, basing the analysis on only seven-hard to abate sector is not representative for all sectors. The 2038 timeline may be feasible for some sectors, especially those that are already making progress on decarbonization or that operate in less carbon-intensive industries. However, for hard-to-abate sectors and companies with complex global supply chains, fully addressing Scope 3 emissions by 2038 may prove more challenging. These companies might need more time or greater external support to meet this ambitious target. Consequently, sector specific considerations may be required.	Step 3: Meet the required carbon credit use and quality thresholds	RWEST

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Seeing how the data suggests 2038 arises from the research from seven hard-to-abate sectors, it is difficult to assume this applies for other sectors.	Step 3: Meet the required carbon credit use and quality thresholds	American Forest Foundation
1. Basing the analysis on only one study can introduce bias in the analysis. Also, it is not clear why the top 25% companies with the largest gaps are excluded from the possibility of making a Scope 3 Claim. This is not an inclusive approach and will limit the possibilities for companies to abate their scope 3 emissions. Moreover, basing the analysis on only seven-hard to abate sector is not representative for all sectors. The 2038 timeline may be feasible for some sectors, especially those that are already making progress on decarbonization or that operate in less carbon-intensive industries. However, for hard-to-abate sectors and companies with complex global supply chains, fully addressing Scope 3 emissions by 2038 may prove more challenging. These companies might need more time or greater external support to meet this ambitious target. Consequently, sector specific considerations may be required. Also, if no carbon credits are allowed to be used after 2038 to reduce corporate emissions (allowing that BVCM might still be available), this will incentivize many carbon projects that require a longer crediting periods	Step 3: Meet the required carbon credit use and quality thresholds	IETA

Comments (compiled)	Section of the Claim	Respondent name/ organisation
than just 13 years. It is not expected that decarbonation of GHG inventories of companies will become easier over time. On the contrary the abatement cost will increase overtime as cheaper emissions reductions will happen first. In conclusion a more flexible approach, including sector-specific considerations, would acknowledge that some industries may need longer to address Scope 3 barriers, while other sectors should be expected to meet the target sooner. 1. Phase out year: VCMI shall provide flexibility in terms of the year to overcome barrier for abating scope 3 emissions, allowing for sector specific considerations and a step-wise approach that allows re-evaluation of the gap over time as companies move forward in trying to achieve their net-zero targets.		
Box 4 Gap Limit: As cross-sectoral average, the 2038 timeline is reasonable and was obtained through a data-driven and evidence-based approach. At the same time, a 13-year timespan offers sufficient time to accommodate for innovation and improvement in energy efficiency and technological innovation, which should play an influential role in the reduction of emission-intensity of various economic activities. The following is to be noted and could be the object of a second iteration of the Scope 3 claim, in coordination with specialized Scope 3 efforts and engagements with sectors, to better tailor requirements to different emissions profiles: Breaking out the analysis by emissions footprint type would be desirable. For example, if 90% of a companys emissions are Scope 3 (e.g., airlines) then the size of gap and time to close it are going to be very different from a manufacturer where 30% of their overall emissions are Scope 3 upstream. This also impacts the concern about greenwashing. If 80% of a companys emissions are Scope 1 (e.g., steel), then limiting a Scope 3 emissions gap to 24% may be unnecessary, as 100% (no limit) could be acceptable. Phase out requirements could similarly be different depending on scope emissions profile. No specific changes besides considering inclusion of text around next iteration of the scope 3 claim with more granularity on different emission profiles.	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
Point 1 - the blanket approach of on track with scopes 1 and 2 is problematic, when considering the investment required per scope is wildly different from sector to sector. FLAG companies can have 5% combined scopes 1 and 2 as a portion of their inventories with 95% as scope 3. Building companies can be as high as 40% for scopes 1 and 2. therefore the challenge for the two is not comparable	Step 2: Meet the Scope 3 Claim requirements	Anonymous

Comments (compiled)	Section of the Claim	Respondent name/ organisation
All frameworks around reporting are currently voluntary and therefore it is ultimately up to a company what they choose to report. If you mean in the context of getting a VCMI level of approval then it could be a requirement, but then you need to allow for the flexibility by companies to utilize carbon credits to make up the difference , especially for hard to abate sectors.	Step 2: Meet the Scope 3 Claim requirements	Bayer Crop Science
· Broadly-speaking, we support the requirements and recommendations. However, we have two specific additional recommendations: 2. It is widely accepted that the most desirable use of carbon credits is for compensating hard-to-abate residual ' emissions. Companies should therefore be required to identify and disclose emissions they consider to be residual ' (i.e. to difficult or costly to decarbonise), both now and in the future. It may then be appropriate at a later stage for companies to be required to retire credits only against those emissions contemporaneously considered to be residual '	Step 2: Meet the Scope 3 Claim requirements	Drax

10 Foundational criteria

Comments (compiled)	Section of the Claim	Respondent name/ organisation
We strongly recommend that VCMI require companies to actually reduce their scope 1 and 2 emissions by about 4% (i.e. a science-aligned pathway), in addition to publicly disclosing their percentage of emissions reductions achieved.. Requiring a 4% annual reduction in the near term, in alignment with the Paris Agreement goals, would ensure that companies are on track with their scope 1 and 2 emissions to meet their near-term science-based targets and significantly increase the rigor and ambition of the Scope 3 Claim. See above.	Step 1: Comply with the Foundational Criteria	Libby Blanchard
We see that the use of the scope 3 claim could increase funding to climate projects. But we don't consider that the theory of change for the scope 3 claim having the potential to drive down companies' value chain emissions has been sufficiently explained in the document.Its helpful to highlight the challenges that companies are experiencing in reducing their scope 3 emissions. But we see a risk that the claim will detract and distract from efforts to overcome those challenges. We commend the attempts, in the foundational criteria, to find ways for companies to demonstrate that they are indeed prioritising decarbonisation, even when investing in carbon credits as well. The requirement to "demonstrate that they are making progress on financial allocation, governance, and strategy towards meeting a near-term emission reduction target;" is key . We note that the MRV document puts most of the weight on allocation of finance (to GHG mitigation, across the value chain) for proving this point and we think this could be problematic. According to companies weve spoken with, its not possible to disentangle "ghg mitigation" finance clearly from other finance. And companies climate transitions should be embedded in their business strategies, so it shouldnt be possible to disentangle finance for ghg mitigation from finance for regular business investments. Therefore we see a risk that a commendable attempt to assess companies commitment and action to reduce emissions would give misleading results.	Step 1: Comply with the Foundational Criteria	Claire Wigg
It should be mentioned that both GHG inventory and climate targets have to be set up for scopes 1, 2 and 3. It should be mentioned that both GHG inventory and climate targets have to be set up for scopes 1, 2 and 3.	Step 1: Comply with the Foundational Criteria	Marine Klobut
Broadly we have no issues with the Foundational Criteria as they are designed to ensure high integrity and are broadly similar to those put in place for the LEAF Coalition. However as discussed by many during the consultation for the Claims Code/Carbon Integrity Claim, the criteria do significantly limit the number of companies that can take action. While it is not within the scope of the consultation for this claim which relates to Scope 3, we would like to see SBTi looking to develop an on-ramp for those companies that currently do not meet the criteria, providing them with a way to take near term climate action, while they move towards compliance with the criteria.	Step 1: Comply with the Foundational Criteria	Philip Brady

Assessment and confirmation that companies are fulfilling these criteria is a helpful addition to the accountability ecosystem in our opinion. We believe this step could be separated out and offered to all companies, regardless of whether they want to take the other three steps.	Step 1: Comply with the Foundational Criteria	Claire Wigg
We commend VCMI for requiring companies to maintain and publicly disclose annual GHG emissions inventory. However, VCMI should explicitly clarify that this refers to a company s entire GHG emissions inventory, including scope 3. This is very important to prevent companies from concealing their scope 3 emissions from public scrutiny (and in turn, confusing investors and the public). This is especially important given VCMI s allowance of companies to increase their scope 3 emissions by up to 24% of their scope 3 trajectory emissions. Companies should be required to publicly commit to meeting their near-term emission reduction targets and not just publicly commit to reaching net zero emissions by 2050. Near-term emission reduction targets are typically set within the time frame of 5-10 years from the year in which the target was set. Meeting near-term targets are important and necessary to align with the urgency of limiting global warming to 1.5 „ƒ. Allowing companies to increase their scope 3 emissions by up to 24% of their scope 3 trajectory emissions is out of alignment with near-term targets. We also commend VCMI for requiring companies to demonstrate that their public policy advocacy supports the goals of the Paris Agreement and does not represent a barrier to ambitious climate action. This is critically important, as research shows that many companies state they promote climate action but in reality, lobby against it (E.g. https://influencemap.org/briefing/The-State-of-Net-Zero-Greenwash-24402 and https://corpgov.law.harvard.edu/2022/12/12/how-companies-are-and-arent-leading-on-climate-policy/).	Step 1: Comply with the Foundational Criteria	Libby Blanchard
The steps are logcal and seem operational. There may need to be a reference to the claims being made on annual basis in the 4 steps outlined. "Comply with the foundational criterea in a year you want to be making claim"	Step 1: Comply with the Foundational Criteria	Conservation International
Box 2: Option to be considered The Four Steps to Making a Scope 3 Claim Step 1: Comply with the Foundational Criteria No comments.	Step 1: Comply with the Foundational Criteria	Carbonext
The claim allows companies to demonstrate that they are taking action on their emissions to the extent that they are able. The foundational criteria help to counter accusations that carbon credit use is taking place instead of carrying out internal action. Great work VCMI	Step 1: Comply with the Foundational Criteria	Anonymous
VCMI correctly identified that companies need further flexibility in addressing their emissions internally in the short-term. It should not change the focus of the claim to instead address emissions outside of a company's target. VCMI, however, should consider also including companies struggling to internalize decarbonize their Scope 1 and 2 emissions by broadening the scope of the claim. NA	Step 1: Comply with the	The Nature Conservancy

	Foundational Criteria	
Furthermore, we urge VCMI to reduce barriers to entry and to promote adoption by enabling a phased approach to use of the claim. Enabling corporates to use the claim for disclosure and to set baselines on which to improve will drive participation. With greater participation, more valuable insights will be gained on how the claim can be improved. The claim must provide an easy access point for companies by setting a lower minimum threshold of emissions assessment and target setting to enable more companies to use the claim now. Promoting early adoption and early use of carbon credits ensures that all companies can set credible pathways to NetZero and contribute now to global emissions reductions.	Step 1: Comply with the Foundational Criteria	Carbonplace
Even if CDP classifies 'A Companies , some companies may not be making progress in reducing Scope 3 emissions.Therefore, there may be cases that companies classified as 'A Companies can also make Scope 3 claim.	Step 1: Comply with the Foundational Criteria	TOKYO GAS CO.,LTD.
A Scope 3 flexibility claim has utility because it will provide companies with some leeway when they do go offtrack. Sufficient safeguards, such as to require companies to demonstrate how they are reducing emissions as much as possible, to prevent credits from being used to greenwash.	Step 1: Comply with the Foundational Criteria	Anonymous
Consider how the Scope 3 flexibility claim can be integrated with the on-ramp when introduced, such as the requirement to have a science aligned target. For instance, the linear trajectory is used for Scope 3, and perhaps it can also use a linear trajectory for overall target, tied to net-zero by 2050. Conceptually, this Scope 3 approach can be applied also to overall emissions against overall trajectory, since being on track for SBTi target is part of the foundational criteria. Add a bridge so that Scope 3 guidance can be used with future on-ramp guidance.	Step 1: Comply with the Foundational Criteria	Anonymous
FincoEnergies supports the use of the Foundational Criteria in the Scope 3 Claim framework. FincoEnergies supports the VCMI in not stipulating the exclusive use of the SBTi target setting system. This provides flexibility for companies to use other target setting guidance which may emerge over time.	Step 1: Comply with the Foundational Criteria	FincoEnergies
No comments.	Step 1: Comply with the Foundational Criteria	MSCI

The Foundational criteria is a positive element of the claims guidance, and encourages companies to priroitse in value chain decarbonisation	Step 1: Comply with the Foundational Criteria	WWF
Emissions reductions targets should follow science-based pathways	Step 1: Comply with the Foundational Criteria	WWF
the foundational criteria are well drafted, and vital to counter the narrative that credits are being used as an alternative to internal climate mitigation	Step 1: Comply with the Foundational Criteria	Anonymous
The text in this section is clear as to the foundational requirements. No additional detail is needed, other than perhaps to clarify that these requirements are consistent for all companies making a VCMI claim. Clarify that these requirements are consistent for all companies making a VCMI claim.	Step 1: Comply with the Foundational Criteria	Anew Climate
This section is a clear and concise summary of the Scope 3 Claim requirements.	Step 1: Comply with the Foundational Criteria	Rubicon Carbon
We agree that companies should maintain and publicly disclose a GHG inventory and this should be broken down by Scope 3 categories for transparency. (see Climate Value Chain Framework,https://www.accelaresearch.com/research/climate-value-chain-framework)	Step 1: Comply with the Foundational Criteria	Accela Research
Please see our earlier responses. Please see our earlier responses.	Step 1: Comply with the Foundational Criteria	E-liability Institute
We support the public disclosure of the scope 3 emissions gap and the actions taken to remove scope 3 emission reduction barriers. Increasingly regulation is requiring public disclosure by companies on climate strategies and decarbonization progress. We	Step 1: Comply with the	RWEST

support both voluntary and regulatory disclosure. Transparency in disclosure support accountability and a baseline for measurement and communication.	Foundational Criteria	
No comment for this section - this is in line with the usual Carbon Integrity Claim	Step 1: Comply with the Foundational Criteria	Climate Impact Partners
Complying with these foundational criteria can potentially boost the overall integrity of VCMI's corporate climate claims that are laid out in its Claims Code of Practice (Nov 2023). These criteria are meant to strengthen corporate climate strategies by ensuring Paris alignment, and we support their inclusion in the Claims Code that "“ by and large "“ moves away from the offsetting model towards a "beyond value chain mitigation "□ (BVCM) or "contribution "□ model. VCMI s Scope 3 Claim, however, backtracks on the progress it made to move away from offsetting by legitimising the use of carbon credits to "address "□ emissions that are firmly within a company s own value chain. This suggests that purchasing carbon credits is essentially the same as, or even relevant to, meeting a scope 3 target. Any climate claim that is the result of such a problematic practice will inherently lack integrity and adding the foundational criteria "“ even when combined with the other steps "“ is not enough to change that. That said, if VCMI insists on moving forward with this misguided approach, requiring companies to comply with the foundational criteria is a necessary first step to decrease the damage. Slight changes or additions to the criteria can be found below. We propose adding an additional criterion: Companies should implement concrete measures to be deforestation free by 2025. Deforestation negatively impacts biodiversity and contributes to global emissions, yet various assessments of corporate efforts to combat deforestation demonstrate a significant lack of ambition. Therefore, adding this to the foundational criteria is necessary to strengthen this guardrail.	Step 1: Comply with the Foundational Criteria	Carbon Market Watch
Disclosure of information publicly must happen after an independent/third party audit. maintain and publicly disclose an annual GHG emissions inventory to maintain and publicly disclose an independently audited annual GHG emissions inventory .	Step 1: Comply with the Foundational Criteria	Sopra Steria Group
AFF is supportive of the VCMI Foundational Criteria as a prerequisite toward achieving the Scope 3 Claim. However, we urge VCMI to consider additional pathways to Scope 3 action for companies that do not yet comply with the Foundational Criteria. We recognize the Foundational Criteria represents a certain baseline of requirement in corporate transparency and integrity, but we urge VCMI to continue considering how to broaden onboarding to a greater participation companies.	Step 1: Comply with the Foundational Criteria	American Forest Foundation

We support the foundational criteria	Step 1: Comply with the Foundational Criteria	Drax
The final bullet as drafted may provide a barrier for some corporates. A conditionality should be added to the beginning of the final bullet point: ' Where a corporate engages in public policy advocacy	Step 1: Comply with the Foundational Criteria	Carbonplace
The Foundational Criteria are generally robust and enable a positive corporate sustainability impact. We suggest they explicitly require the development of a publicly available transition plan that lays out in detail the plan to achieve science-aligned targets, rather than simply mentioning in the Claims Code that these reporting requirements (financial allocation, governance, etc.) represent recommended best practice for climate transition plans. Consider requiring a transition with the mentioned characteristics: "demonstrate availability of a transition plan to inform and track progress on financial allocation, governance, and strategy towards meeting a near-term emission reduction target"	Step 1: Comply with the Foundational Criteria	Center for Climate and Energy Solutions
The only specification that could be made, is to the first bullet: Adding precision on inventory boundary: maintain and publicly disclose an annual GHG emissions inventory with maintain and publicly disclose an annual GHG emissions inventory, with all material and measurable emissions for Scopes 1-3 need accounted for in the inventory. "□	Step 1: Comply with the Foundational Criteria	Center for Climate and Energy Solutions
Both for the credibility of the disclosed inventory and for the credibility of the Scope 3 claim, it is essential that the estimated inventory for Scopes 1, 2 and 3 emissions be audited with limited asurance during the first three years of the Claim and with reasonable assurance thereafter. maintain and publicly disclose an annual estimated GHG emissions inventory disaggregated in Scopes 1, 2 and 3 emissions and subject to an independent audit with limited assurance during the first three years of the use of the Scope 3 Claim and with reasonable assurance thereafter.	Step 1: Comply with the Foundational Criteria	Institute for Agriculture and Trade Policy
"Science aligned" is a semantically diluted form of "science based" Set and publicly disclose science-based near term absolute emission reductions targets	Step 1: Comply with the Foundational Criteria	Institute for Agriculture and Trade Policy
It is possible to advocate for a policy publicly while financing campaigns against that policy. advocacy and policy and/or electoral campaign donations support	Step 1: Comply with the Foundational Criteria	Institute for Agriculture and Trade Policy

Inventory disclosures should be audited by a third party withreasonable assurance "inventory audited by a third party with reasonable assuranceWhat changes (if any) would you propose to the above text?	Step 1: Comply with the Foundational Criteria	Institute for Agriculture and Trade Policy
SBTi plans an annual review progress to achieving the near term emisions reduction target "demonstrate in an annual report that	Step 1: Comply with the Foundational Criteria	Institute for Agriculture and Trade Policy
Paris Agreement goals are very high level; corporates should support PA implementation measures "goals and implementation measures of" "regulation and finance"	Step 1: Comply with the Foundational Criteria	Institute for Agriculture and Trade Policy
There also needs to be progress demonstrated toward reaching their targets, for at least scope 1&2 near term in addition to strategy and allocation. Being explicit about companies being "on track" for scopes 1&2 even in presence of Scope 3 emissions gap as part of foundational criteria.	Step 1: Comply with the Foundational Criteria	Conservation International
Increasingly regulation is requiring public disclosure by companies on climate strategies and decarbonization progress. This is an important part of the climate mitigation path. We support both voluntary and regulated disclosure. Standardization in this field is key to being able to compare and benchmark performances against targets or between peers.	Step 1: Comply with the Foundational Criteria	BURN manufacturing
Increasingly regulation is requiring public disclosure by companies on climate strategies and decarbonization progress. We support both voluntary and regulated disclosure. Consistency supports broader understanding so organizations can be evaluated against the same criteria.	Step 1: Comply with the Foundational Criteria	IETA
Companies should publicly and transparently disclose their use of carbon credits. This includes disclosure of quantities and details about the carbon credits that have been retired by the company within a reporting year. This should include project name, type, vintage, location, the programme and methodology under which the credits were issued, purpose of retirement, link to registry retirement listing and any relevant due diligence measures undertaken. Companies are also encouraged to report on the social and environmental benefits and risks of their carbon credits. Where companies are using carbon credits to compensate for under-delivery or missed targets, it is essential to disclose through annual reporting why these targets were missed - that is, clarifying the planned mitigation activity that could not take place, why it could not be implemented, and how long this may last, in line with best practices in quantifying an organisation 's climate risk.	Step 1: Comply with the Foundational Criteria	IETA

Although we support the disclosure of emissions and progress, we support reducing the barriers to use carbon credits in the short term. We suggest phasing in this second step. Public disclosure and transparency are crucial in the assessment of a corporate's progress. However, this must be flexible whilst voluntary. The purpose of the VCMI claim must be to incentivise more corporates to begin the process of disclosure and attract those earlier in their mitigation journeys. The public disclosure of progress in emissions reductions across scopes 1 and 2, and challenges relating to scope 3 provide valuable transparency for stakeholders. By requiring companies to disclose their progress towards near-term targets, the VCMI enables stakeholders to assess whether companies are making meaningful efforts to reduce their emissions.	Step 1: Comply with the Foundational Criteria	Carbonplace

11 2038 phaseout guardrail

Comments (compiled)	Section of the Claim	Respondent name/ organisation
the text should stress that clear milestones or checkpoints need to be in place to track companies' progress. Simply aiming for 2038 could allow for complacency until the deadline approaches.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
I am not sure it is reasonably to expect this, particular the 25% who are currently struggling to tackle scope 3. While making the claim timebound is important to show integrity but this feels too soon. It also does not take into account companies who nave not yet set a target and are further back on their journeys but may be on a more positive trajectory by 2038 but not quite there yet.	Step 3: Meet the required carbon credit use and quality thresholds	Philip Brady
2. Guardrail puts a deadline on use of credits, again we agree in theory, but would suggested a longer period, say 2040. For guardrail 2 we believe that 2038 may be too early. It may act as a disincentive to companies who have not yet set targets but will be further on int their climate journey by 2038 - Suggest moving this back - 2040 to provide a little bit of leeway.	Step 3: Meet the required carbon credit use and quality thresholds	Philip Brady
For me 2038 is way too late to set the phase out date. I see a huge risk that the scope 3 claim disincentivizes companies from deploying finance towards R&D mitigation activities that are more expensive today but need finance today in order to bring down costs in the future (delaying the tipping point in technology cost curves). I fear that it will prevent the systemic transformation of harder-to-abate sectors and put net-zero out of reach. The IPCC AR6 highlights that "options are available now in every sector that can at least halve emissions by 2030." Similarly, the International Energy Agency (IEA) states that existing technologies provide nearly all of the emissions reductions required to 2030. However, in the longer-term to achieve net-zero by 2050, the IEA estimates that almost 50% of emissions reductions will need to come from technologies currently at demonstration or prototype stage and which need funding to rapidly scale. I've put "neither agree nor disagree" to this question because the SBTi pathways are based on the techno-economic potential for the sector so in theory they should have been able to be on track anyway. I do realize techno-economic modelling is not always what happens on the ground but I think it's still worth me mentioning that. Also, SBTi's most ambitious scope 3 target option only requires a 1.7% annual reduction in scope 3. Otherwise they can use physical intensity, economic intensity and even supplier engagement targets. I don't feel particularly sympathetic to companies that can't achieve that (sorry if that's a bit blunt, but we're in a climate crisis after all which deserves a proportional response).	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson

We don't consider this to be the most relevant question here, and we expect there will be companies that are on track and companies that are not on track in 2038. Between now and then there will have been developments in how targets are set and up-dated. The more relevant question is "From the perspective of 2024, is 2038 a reasonable cut-off date for use of this claim?" We don't think we can predict much about the state of companies' mitigation efforts or of global emissions so far ahead. So we have to consider the possible impacts that setting the cut-off date at 2038 might have on company action between now and then, and on development and funding of climate projects.	Step 3: Meet the required carbon credit use and quality thresholds	Claire Wigg
As mentioned in Scope 3 Claim b), a clarification would be needed regarding the accessibility of the claim 'any given year' until 2038. Would this include the time t(y) = t(interim target) or only as long as t(y) < t(interim target) ? This would clarify whether it is possible for a company to make such a Claim on the way to meeting the interim target only, or even at the interim target year (which could be more problematic for some). Please specify based on above comment	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
It is crucial to incorporate the financing aspect for millions of SMEs within this approach. These businesses, often through carbon credits, require funding to support their decarbonization initiatives. Verified, high-integrity GHG reductions based on CCP-approved standards with a 50% gap are vital for financing emission reduction projects, particularly in sectors like building infrastructure. This allows SMEs to act immediately without waiting for the full decarbonization of Scope 3 emissions from the 9,000 large corporations and brands committed to the SBTi. We propose implementing a phased reduction strategy: 75% of emissions should be phased out by 2040, with 25% reserved for hard-to-abate emissions, which can be leveraged to finance decarbonization efforts among SMEs. There are no additional comments regarding the trajectory element outlined on page 31.	Step 2: Meet the Scope 3 Claim requirements	Solutions Will
The 2038 timeline is a little unclear - does that mean that the Scope 3 claim will no longer be possible from 2038?	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
The rationale for imposing 2038 as the deadline for closing the emissions gap could also be better explained. Again, this feels like a very arbitrary deadline - some companies will certainly still be off track and the methodology to get them back on track should not change mid-way through their decarbonization journey. These companies should be given the same opportunity to get on track. We propose giving companies the opportunity to propose their target for getting on track, e.g. phasing out the need for carbon credits and the Scope 3 Claim.	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate
Also, if no carbon credits are allowed to be used after 2038 to reduce corporate emissions, this will disincentivize many carbon projects that require a longer crediting periods than just 13 years. It is not expected that decarbonation of GHG inventories of companies will become easier over time. On the contrary the abatement cost will increase overtime as cheaper emissions reductions will happen first.	Step 3: Meet the required carbon credit use and quality thresholds	RWEST

Whilst we understand that a time-bound limit is applied, we question to what extent it would actually drive continuous improvement, nor require that by 2038 the emissions gap will be eliminated. The commitment to a Scope 3 claim would of course 'bake in' a financial cost of falling behind targets, and so encourage companies to reduce further, however by not doing so there is no other consequence of not reducing the shortfall. In fact, applying a time limit effectively reduces the amount of time that a company can 'take responsibility' for any shortfall and it is possible that companies could therefore just stop making a Scope 3 claim at 2038 if they are still behind.	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
· To build credibility, we believe the guidance need to recognise the importance of transitioning towards Net-Zero eligible credits, as outlined in the Oxford Offsetting principles. Namely, the guidance should require a progressive increase in permanent CDR within an organisation's portfolio relied upon for Scope 3 compensation. · The guidance is inconsistent with the nature of scaling voluntary carbon markets, on the basis that it calls for phasing out for 2038, without clear identification of alternative long-term roles of carbon credits. Taken in isolation, the guidance could be insinuated that there will be a lesser need for carbon projects in the future, not more. We suggest alternative framing should be provided. · For example, phasing out of carbon credits could rather be framed as one or several of the following: 1. A mechanism that supports transitioning use of carbon credits from avoidance/reduction credits to net-zero compatible credits (i.e. permanent carbon removals), in accordance with Oxford Offsetting Principles 2. A mechanism that supports transitioning claims for avoided/reduced emissions from compensation claims to climate contribution claims and/or claims related to the delivery of people/nature positive strategies (i.e. other BVCM activities) 3. A conservative initial position that keeps companies aligned to corporate net-zero targets but that may be updated in line with the latest science on the effectiveness of carbon credits (i.e. quality/integrity) and their role in supporting corporate decarbonisation (i.e. do they serve as mitigation deterrence or not)	Step 3: Meet the required carbon credit use and quality thresholds	Drax
Consider a term limit to the claim Instead of a phase out date, prevent companies from using the guidance 5 years in a row.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
Consider allowing the Scope 3 guidance to be used for a number of years (e.g. 5), rather than have it expire in 2038. A company that is started in 2035 would have a lot less time to meet the 2038 deadline than a company today, and the impact may be that companies will stop trying. It may be more important to ensure that a company does not persistently miss its targets (e.g. consistently miss targets for 5 consecutive years), than to make sure this guidance cannot be used after 2038. We would expect that companies will continue to face unforseen circumstances and may need flexibility beyond their targets.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
The net zero target is set for 2050 and to be achieved involves carbon capture not just removal. By 2038 it is expected that the emission gap has been addressed, however, considering scope 3 holds a significant amount of companies carbon emissions this seems very ambitious without the use of carbon credits.	Step 3: Meet the required carbon	AHDB

	credit use and quality thresholds	
If the use of carbon credits are to be phased out by 2038, there is less incentive to encourage farmers to for example plant trees. This is specifically when considering offsetting. Will the use of credits for insetting still be permitted? Insetting will provide incentive for action.	Step 3: Meet the required carbon credit use and quality thresholds	AHDB
	Step 3: Meet the required carbon credit use and quality thresholds	FincoEnergies
We agree that it is reasonable. We think that it is also reasonable to assume that any company that has not closed the gap by 2038 is unlikely to achieve this goal thereafter. This raises the question of whether the Scope 3 Claim would serve as a suitable incentive for Scope 3 action beyond this date.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
We suggest that the VCMI reserve the right to adjust the 2038 target date in the future, as it is a long way off and the world will likely look very different by then. However, for the present, we agree that 2038 serves as a suitable target date.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
Based on the explanation and data presented it is reasonable to conclude that by 2038 emission gaps and Scope 3 emission reduction barriers have been somewhat addressed. However, we have concerns about basing the phase out of this entire Scope 3 Claim mechanism based on this one study. Further, as the curves presented in the MPP data ultimately present a single averaged pathway per sector for only seven sectors (albeit the hardest to abate sectors), some companies and some sectors may have emissions and emissions pathways above that average and may continue to encounter challenges to overcome barriers to close the emissions gap. Such companies may need additional time and/or further external support. More flexibility is needed, with a phase-out of the Scope 3 Claim moved to a later date. We propose instead requiring that companies self-impose and communicate a target date for when they will phase out the use of carbon credits.	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate
We oppose fully phasing out the Scope 3 Claim mechanism at 2038. We suggest moving this phase out to a later date (2040 at earliest), allowing companies to propose their own target phase out date, or eliminating the phase out entirely for companies that continue to show progress towards closing their emissions gap. Move this phase out to a later date (2040 at earliest), allow companies to propose their own target phase out date, or eliminate the phase out entirely for companies that continue to show progress towards closing their emissions gap.	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate

Companies in all sectors have decarbonisation pathways available to them, and another 14 years are sufficient to address any barriers.	Step 3: Meet the required carbon credit use and quality thresholds	Mundys
It is highly unlikely that all sectors will have been able to address their Scope 3 reduction barriers by 2038 and fully back on track with their climate targets. As previously stated, VCMI should implement sector specific guardrails, including the cutoff year for the claim. As long as there are non-readily abatable emissions in the expected company reductions, companies should be able to use credits to cover for them while they keep engaging in addressing the barrier. Nonetheless, TNC is comfortable with the interim 2038 limit as an incentive for companies to decarbonize internally as long as VCMI clearly commits to revisiting this guardrail periodically per sector to ensure that it is still up to date to the projected coporate decarbonization progress.	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
A secondary consideration of this claim is the sheer volume of offsets that will be required in the market to meet the demands from multiple companies. The requirement to cease using offsets by 2038 may not provide sufficient incentives for the development of high-quality projects. It is unclear why the program ends in 2038 or how offset programs will be managed thereafter.	Step 3: Meet the required carbon credit use and quality thresholds	Accela Research
If no carbon credits are allowed to be used after 2038 to reduce corporate emissions, this will disincentivize many carbon projects that require a longer crediting periods than just 13 years. It is not expected that decarbonation of GHG inventories of companies will become easier over time. On the contrary the abatement cost will increase overtime as cheaper emissions reductions will happen first.	Step 3: Meet the required carbon credit use and quality thresholds	RWEST
At the current rate of reduction, and the need to still develop significant new technologies and climate solutions to reach global net zero by mid-century, it's increasingly likely that by 2038 companies will still not have been able to address their Scope 3 reduction barriers.	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
Agree, no comment. It is reasonable to expect (14 years from now with a further 12 years for 2050), provided the UN, the EU and major economies legislate and focus towards a Net Zero economy by 2050. Agree, no comment.	Step 3: Meet the required carbon credit use and quality thresholds	Sopra Steria Group

Likely not, but it is helpful to set a target in the mid-term future that companies can drive towards and to create a sense of direction and urgency to start now in order to meet that goal.	Step 3: Meet the required carbon credit use and quality thresholds	Bayer Crop Science
Emissions gap declining over time: The 2038 phase-out date is one of the key problems with the Scope 3 Flexibility Framework because it permits companies to use large volumes of credits for an extended period of time before they have to return to their science-aligned decarbonisation trajectory. In other words, companies would be allowed to pollute more than their annual decarbonisation target - for scope 3 - by 24% until the phase-out date. The 2038 phase-out date is based on VCMI calculations that focus on the time it will take for the sectors that are hardest to decarbonise to get back on track with pathways compatible with a "well below 2°C"□ trajectory. Based on this analysis, only extremely hard-to-abate sectors (aviation, shipping and trucking) will not yet be on a pathway that is compatible with the Science Based Targets initiative (SBTi) by 2038. Other sectors should reach it much sooner, such as aluminium (2031), chemicals (2033), steel (2033) and cement (2037). As the VCMI framework is by nature voluntary, there is a real risk of adverse selection, whereby companies in sectors that are easier to decarbonise will, nonetheless, sign up to the new scope 3 rules which have been crafted for much harder-to-abate sectors, while those with even lower climate ambition would simply stay out. The following changes should be implemented: -The 2038 phase-out date is unacceptably lengthy and should be cut significantly.	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch
The opportunity to use the Scope 3 Claim should not end in 2038. We suggest VCMI seek some sort of continuation to recognize companies that continue to advance Scope 3 objectives beyond 2038. See above comments.	Step 3: Meet the required carbon credit use and quality thresholds	American Forest Foundation
2. Evidence for not having a termination year for the Flexibility claim, based on IETA_Allied Offsets Study: Pg 38: The research shows that for hard-to-abate-sectors, the 'Low Cost Pathway exceeds the Paris pathway right out to 2050. We therefore do not support VCMI ending the flexibility claim in 2038. Note, although the 'Fastest Abatement pathway does align with Paris from around 2035 onwards, this pathway is deemed as unachievable as it disregards the cost of mitigation. Pg 17&19: The Research study estimates that corporates will miss meeting scope 3 targets by 62% on aggregate amounting to a massive 24Gt in 2030. VCMI will help raise ambition by permitting flexibility for corporates to use carbon markets to close the gap and not limit the gap to only 24%.	Step 3: Meet the required carbon credit use and quality thresholds	IETA

3. VCMI is encouraged to consider the supply pipeline of credits to achieve global net zero. By limiting the use of credits to 2038 for the Scope 3 Flexibility claim you will be "switching off the tap" of carbon market investment including investment into removals. Removals must be funded and scaled to achieve net zero. 2. Remove the time restriction. Text proposal: "VCMI provide an inclusive and flexible approach in terms of the year to overcome barrier for abating scope 3 emissions, allowing for sectoral, regional and scale specific consideration"□.		
With most companies who have set science- aligned targets having interim goals of 2030 or earlier, 2038 seems a reasonable time to overcome scope reduction 3 barriers, however Conservation International would encourage greater flexibility for the gap limit (presently 24%) to accommodate for companies with current gap greater than the threshold but ready to take action now and invest in NCS. We appreciate the rationale that has gone in design of the gap limit and it would be good to explore the feasibility with piloting the scenarios reflective of greater flexibility and moving forward depending on the feedback received.	Step 3: Meet the required carbon credit use and quality thresholds	Conservation International
Per our earlier response, we would support a reframing of the ' phase-out ' to a transitioning of use, leaving the door open to compensation post-2038 where using credits aligned to Net Zero targets (i.e. permanent CDR)	Step 3: Meet the required carbon credit use and quality thresholds	Drax
First, see our comment on Box 3. We assume that the guardrails are the annual 24% carbon credit use ceiling during the period of the near term target, and that this use can extend to 2038. We do not agree that these guardrails will incentivize "immediate action" to reduce Scope 3 emissions in a near term science-based target. The guardrails would allow too much time for delayed Scope 3 reduction actions IATP strongly disagree that VCMI should prime the pump for the purchase of carbon credits that are not CCP labeled.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy

12 24% gap limit guardrail

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The 24% threshold on the emissions gap is introduced, but there is no explanation for why 24% is the chosen limit. It might be beneficial to include some justification or background on why this figure was selected. Is it based on industry standards or a specific study? This would add context and credibility to the number.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
The 24% rule should also be illustrated by examples. Examples are needed to ensure understanding.	Step 3: Meet the required carbon credit use and quality thresholds	Marine Klobut
Putting a high value like the 24% does only allows that companies not really trying to achieve higher emission reductions have also the possibility to have a scope 3 claim	Step 3: Meet the required carbon credit use and quality thresholds	Javier Castro
Agree but it could equally stop companies who are making efforts but have a long way to go from making a claim. Agree with the need for a guardrail but would suggest a re-think.	Step 3: Meet the required carbon credit use and quality thresholds	Philip Brady
For guard rail 1 we would question to idea of excluding the companies with the largest gap in relation to their overall scope 3 footprint. This could disincentivize large amounts of climate action. It is also difficult to understand, although we get the thinking behind it. We have no specific alternatives but would suggest a re-think.	Step 3: Meet the required carbon credit use and quality thresholds	Philip Brady

Comments (compiled)	Section of the Claim	Respondent name/ organisation
I understand the rationale behind the 24% (I think it was a comment I made that triggered VCMI to look at it). But it's completely divorcing the pathways from the emission sources. You're assuming all companies scope 3 emissions lie in the hard-to-abate sectors which isn't true. I therefore think putting such a precise number on it makes it seem science based when it's not really science-based at all. It would almost be better to say it's 30% and there is no basis for that other than that's what companies thought sounded right. My original proposal (which is clearly way too complicated) was that if you wanted to build in some flexibility you could look at the SBTi pathway per scope 3 emission source (where SBTi picks the average linear % reduction) and VCMI could instead take the lower % reduction value and say that the gap between the average and the lower value is the eligible gap for offsetting. See above. Also copied here: I understand the rationale behind the 24% (I think it was a comment I made that triggered VCMI to look at it). But it's completely divorcing the pathways from the emission sources. You're assuming all companies scope 3 emissions lie in the hard-to-abate sectors which isn't true. I therefore think putting such a precise number on it makes it seem science based when it's not really science-based at all. It would almost be better to say it's 30% and there is no basis for that other than that's what companies thought sounded right. My original proposal (which is clearly way too complicated) was that if you wanted to build in some flexibility you could look at the SBTi pathway per scope 3 emission source (where SBTi picks the average linear % reduction) and VCMI could instead take the lower % reduction value and say that the gap between the average and the lower value is the eligible gap for offsetting.	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson
Permitting carbon credits to be used for Scope 3 emissions risks mitigation deterrence, regardless of a limit or not on the emission gap. The argument presented by VCMI that having this emission gap limit may exclude companies that are putting an effort in, is counterintuitive to actual effort of reducing emissions. Regardless of a limit on the emission gap or not, permitting carbon credits in Scope 3 would disadvantage the companies actually making an effort in decarbonising their value chain, whilst permitting companies who are already lagging behind to continue doing so until 2038.	Step 3: Meet the required carbon credit use and quality thresholds	ECOS
We want to incentivize companies to take action in all forms, so if companies have an emissions gap higher than 24% but are working towards removing barriers and have plans and investment in place to continue to reduce their emissions this should be acknowledged. Comments provided above.	Step 3: Meet the required carbon credit use and quality thresholds	Bayer Crop Science

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The 24% flexibility is far too high of an allowance. If companies were to embrace this high-level of flexibility instead of decreasing their indirect emissions, it would severely threaten our global climate goals. An even more concrete illustration of how this 24% flexibility allowance can affect, for example, SBTi-certified scope 3 targets corporate 2030 targets can be found in a graph in a post published by NewClimate Institute. NewClimate tested the application of VCMIs Scope 3 allowance on 16 companies analysed in the 2024 Corporate Climate Responsibility Monitor and found that the "Scope 3 Claim could further weaken the already insufficient 2030 targets of most companies [and that the 24%] allowance could reduce scope 3 targets to levels that are critically insufficient for achieving sector-specific trajectories needed to limit global warming to 1.5°C"□. The following changes should be applied: A. Obtain company data. Companies should provide: base year emissions; target reduction, in percentage terms; and most recently reported scope 3 emissions included in the target boundary. [addition: "The target boundary should extend as far as possible to cover a minimum of 90% scope 3 emissions"]. [...] D. Check if scope 3 emissions gap is greater or less than [change + addition: "10% of the gap between where a company is and where it should be (in other words, the difference between reported emissions and target trajectory emissions in a given year)"].	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch
Apply Guardrails & Box 4 "The scope 3 emissions gap must not exceed 24% of a companys scope 3 trajectory emissions included in the target boundary in the year it is making the claim."□: What are the penalties for non-compliance with this condition? This should be clearly stated in this part of the document.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonext
Apply Guardrails & Box 4 What safeguards are included in the initiative to ensure that a company is not underestimating the potential rate of its Scope 3 emission reductions in order to remain compliant with the 24% rule?	Step 3: Meet the required carbon credit use and quality thresholds	Carbonext
Taking into account the proposed requirements and safeguards, the Scope 3 Claim will help accelerate progress towards achieving global net-zero goals, for those companies eligible to use the Scope 3 Claim (e.g. have an emissions gap of less than 24%) The requirements provide direction for participation, removing ambiguity around the purchase of carbon credits and applying towards corporate decarbonization.	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate

Comments (compiled)	Section of the Claim	Respondent name/ organisation
However, improvements to the approach need to be implemented to ensure that the framework provides an actionable approach for more companies to abate their scope 3 emissions, including: - The approach needs to provide enough flexibility in terms of emission gap thresholds. The 24% limit is overly arbitrary and will likely exclude companies who want to leverage this mechanism. In the absence of a consistent industry standard, this offers guidance for organizations participating in the market. However, the 24% emissions gap threshold and 2038 phase-out are overly arbitrary. Similarly, while we support reporting on progress, and believe this should be encouraged, requiring that companies report on their failures as to why they havent made more progress at closing the emissions gap is overly onerous and unrealistic. Limiting the Scope 3 Claim to companies who are no more than 24% off track from the target trajectory emissions is somewhat complex and not straightforward for the average consumer or public to understand, particularly with regards to determining what the trajectory emissions should be, in comparison to a companys stated targets. The concept of a linear emissions trajectory seems to imply that decarbonization should also be linear, when this is not likely to be the case. While VCMI does attempt to rationalize and document HOW they came to the 24% threshold later in the document, it is seemingly quite arbitrary and based on macro-level analysis, as opposed to considering how to be most pragmatic and workable at a micro- (or company-level), where it must be implemented. Further, conceptually, it is unnecessarily limiting. If companies are trying to take additional action to show a commitment to climate action and "getting back on track," it seems counterintuitive to limit this to companies who are no more than 24% off track. We strongly encourage VCMI to reconsider this limit. We encourage VCMI to allow high quality carbon credits to be used by any company who is "off-track" regardless by how much, as a means of showing their commitment to climate action, in combination with demonstrating efforts to get back on track. Carbon credits should be acceptable for addressing all scope 3 emissions.		
The text clearly explains the Scope 3 claim principles and is specific with both the magnitude of Scope 3 emissions that can be covered with credits and the timeframe to implement reduction strategies in order to stay on track with emissions reductions targets. The fundamental requirement that companies must have science based targets for their Scope 3 emissions indicates that at least the minimum amount of work has been done to map supply chains and understand the sources of Scope 3 emissions. For any company that has accurately mapped their Scope 3 emissions there are almost always immediate opportunities to reduce emissions with actions such as improving sourcing strategies, reducing waste, improving efficiency of machinery, etc. Allowing for 24% of the Scope 3 emissions to be covered with credits eliminates the need to address the low hanging fruit of emissions reductions and generally with delay climate action. Given the high concentration of emitters in certain countries and the lack of credit projects in those same countries, it is almost certain that this approach will not have a positive impact on a country emissions number and is mostly likely going to lead to lower emissions reductions in the countries with the highest emissions as a result. The timeline for emissions reductions is too long. We need incredibly meaningful	Step 3: Meet the required carbon credit use and quality thresholds	TheoryMesh

Comments (compiled)	Section of the Claim	Respondent name/ organisation
reduction as soon as possible. It would be ideal to reduce both the percentage of Scope 3 emissions allowed to be covered by credits and the timeframe to achieve the corresponding emissions reduction.		
Further clarity on the calculation to be used to identify the percentage of scope 3 emissions that can be mitigated with carbon credits. The text highlights that carbon credits must cover the entirety (100%) of the emissions gap, but that it can't exceed 24% of the scope 3 trajectory emissions. Without defined distinction between the two, the statement is confusing. An illustrative example calculating the amount of Scope 3 emissions that can be offset with carbon credits.	Step 3: Meet the required carbon credit use and quality thresholds	Invert
While VCMI does attempt to rationalize and document HOW they came to the 24% threshold later in the document, it is seemingly quite arbitrary and based on macro-level analysis, as opposed to considering how to be most pragmatic and workable at a micro- (or company-level), where it must be implemented. Further, conceptually, it is unnecessarily limiting. If companies are trying to take additional action to show a commitment to climate action and "getting back on track," it seems counterintuitive to limit this to companies who are no more than 24% off track. We strongly encourage VCMI to reconsider this limit. We encourage VCMI to allow high quality carbon credits to be used by any company who is "off-track" regardless by how much, as a means of showing their commitment to climate action, in combination with demonstrating efforts to get back on track. Carbon credits should be acceptable for addressing all scope 3 emissions.	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate
An example of a company that is off track and within the 24% boundary would be helpful. In addition an example of a company with a bigger gap should be given for better understanding.	Step 3: Meet the required carbon credit use and quality thresholds	ClimatePartner
The 24% cap on credit usage is too limited In capping credit usage in the Scope 3 Claim, VCMI has adopted a maximum credit limit of 24% of a company's Scope 3 emissions. To set this cap, net zero trajectories from hard-to-abate sectors were aggregated and compared to SBTi's well below 2 oC emissions reduction commitment. It was determined that the average curve did not exceed 24% of SBTi's curve in any year. This methodology was developed for VCMI by Accenture and is detailed in a separate report submitted in August 2024. An average curve of seven sectors smooths out substantial variability in the sector-level pathways relative to the SBTi pathway. Figure 8 of Accenture's report indicates this: here, you can see that the largest gap at the sector level exceeds 50 percent, more than double the limit proposed by VCMI. The analysis also does not account for the fact that these sector-level pathways are aggregate modeled scenarios that smooth variability related to geography and other factors. We appreciate the desire to have a set Claim limit. Still, without high-quality data to model corporate emissions pathways within a probabilistic framework, we worry that these limits, laden with opaque assumptions, will do more harm than good. As mentioned above, we are particularly concerned they could discourage companies in the developing world, where access to	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
decarbonization technologies is more limited. VCMI could assemble the data to develop such a model, significantly contributing to creating robust net-zero action. However, without doing such work, no specific limit should be placed on credit use to address a Scope 3 emissions gap. We favor a modified version of the proposal in Box 5 of the Beta Scope 3 Claim report where companies are expected to demonstrate progress on reducing Scope 3 emissions""just as they are expected to do so for their main VCMI claim""while using credits to address their emissions gap in the meantime. We recommend restructuring the methodology to incorporate the elements outlined above.		
While we understand how the 24% has been derived, its current justification adds unnecessary complexity that may make this requirement irrelevant over time. If there is a need for a threshold, we recommend 25% simply for ease of use and application for the user.	Step 3: Meet the required carbon credit use and quality thresholds	Accela Research
How the 24% threshold was set? It is not clear how this number was set and the implications of having higher or lower thresholds. Please explain.	Step 3: Meet the required carbon credit use and quality thresholds	BURN manufacturing
Likewise enforcing the maximum threshold of 24% prevents may prevent many companies from demonstrating additional action to demonstrate commitment to climate action.	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Consider increasing the limit from 24% of credits, such as an additional 5% because it is based on the maximum average gap for hard-to-abate sectors. This could be linked with a requirement for a target for within-sector, or within-geography credit use. Based on the definition for 24%, it implies that 50% of the companies in these hard-to-abate sectors will be excluded because they fall above the average. Additional safeguards can be added (e.g. disclosure of decarbonisation plans, investment in decarbonisation solutions) to ensure that the use of credits is not abused. Further, as companies reduce emissions more in the future, additional shocks that lead to an increase in emissions will be a greater percentage of total emissions. This guidance at the moment does not cater for such unforseen circumstances. Consider increasing the limit from 24% of credits Increase the limit from 24% of credits to 29%.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
The 24% threshold is a reasonable starting point as it accommodates most companies (75%) actively working to reduce Scope 3 emissions. However, given the sampling bias (i.e., only companies already committed to reducing Scope 1, 2, and 3 were studied) and the likelihood that the upper quartile faces significant decarbonization challenges, the 24% limit likely excludes some companies making genuine efforts but struggling due to the complexity and]cost of reducing Scope 3 reductions in their value chains. Excluding the upper 10% or outliers in determining the emissions gap limit may better accommodate sectors or companies with structural or technological barriers. This would still set a firm limit while better accommodating sectors or companies with structural or technological barriers, making the guardrail more inclusive and reflective of varying decarbonization capacities across industries. None.	Step 3: Meet the required carbon credit use and quality thresholds	Invert
We find that allowing an emissions gap of up to 24% risks dialling back the already insufficient levels of corporate climate ambition to marginal business-as-usual emission reductions and will even allow some companies to continue increasing emissions in the short term. This will not differentiate in any way between companies making efforts to reduce scope 3 emissions, and those that do not make efforts. Allowing an emissions gap of up to 24% risks dialling back the already insufficient levels of corporate climate ambition to marginal business-as-usual emission reductions. To illustrate the implications of the Scope 3 Claim for existing 2030 targets, we tested it on the 16 companies covered in the 2024 Corporate Climate Responsibility Monitor report that have SBTi-validated 2030 targets for scope 3 emissions. Figure 1 of our	Step 3: Meet the required carbon credit use and quality thresholds	NewClimate Institute

Comments (compiled)	Section of the Claim	Respondent name/ organisation
briefing demonstrates that the revised Scope 3 Flexibility Claim could further weaken the already insufficient 2030 targets of most companies. The VCMI allowance could reduce scope 3 targets to levels that are critically insufficient for achieving sector-specific trajectories needed to limit global warming to 1.5°C. Some companies would be eligible for the VCMI claim with emission reduction levels so minimal that they essentially represent business-as-usual scenarios, requiring no meaningful climate action. The VCMIs provisions for companies emissions trajectories, based on the use of a carbon budget approach, would risk distracting from and delaying short term action, by allowing companies to continue increasing their emissions in the short-term. Figure 2 of our briefing illustrates an example of a company with a target to reduce its scope 3 emissions by 50% between 2025 and 2035. Due to the 24% flexibility allowance in addition to VCMIs provision for companies to chart a non-linear pathway towards their targets, this company would be able to steadily increase its emissions for the first half of the target period up to 2030 while still qualifying for the VCMI Scope 3 Flexibility Claim. The VCMIs carbon budget approach would eventually require companies to reduce emissions over the latter half of the target period. However, companies could simply abandon or backslide on its targets at this point, after benefitting from the flexibility for years. This could potentially allow the company to use the Scope 3 Flexibility Claim to distract from and delay meaningful climate action. Short-term flexibility for corporations would delay necessary transitions and distract from their lack of progress""a fundamentally wrong approach to addressing the climate crisis. Companies must take immediate action to drastically reduce emissions within their value chains while developing long-term strategies for transitioning to net zero. We cannot afford any periods of inaction if we are to meet the goals of the Paris Agreement. We find that allowing an emissions gap of up to 24% risks dialling back the already insufficient levels of corporate climate ambition to marginal business-as-usual emission reductions and will even allow some companies to continue increasing emissions in the short term. This will not differentiate in any way between companies making efforts to reduce scope 3 emissions, and those that do not make efforts. Allowing an emissions gap of up to 24% risks dialling back the already insufficient levels of corporate climate ambition to marginal business-as-usual emission reductions. To illustrate the implications of the Scope 3 Claim for existing 2030 targets, we tested it on the 16 companies covered in the 2024 Corporate Climate Responsibility Monitor report that have SBTi-validated 2030 targets for scope 3 emissions. Figure 1 of our briefing demonstrates that the revised Scope 3 Flexibility Claim could further weaken the already insufficient 2030 targets of most companies. The VCMI allowance could reduce scope 3 targets to levels that are critically insufficient for achieving sector-specific trajectories needed to limit global warming to 1.5°C. Some companies would be eligible for the VCMI claim with emission reduction levels so minimal that they essentially represent business-as-usual scenarios, requiring no meaningful climate action.		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The 24% cap and phase out holds companies accountable and avoids the mind set of keep pollution and just buy credits.	Step 3: Meet the required carbon credit use and quality thresholds	AHDB
<24% gap guardrail As per our Box 5 feedback, while we do not raise concerns regarding the rational of the 24% number itself, we disagree that it be used as a limit beyond which there is a barrier to participation in the Scope 3 Claim framework. Instead we suggest that VCMI retains the 24% as solely a cap on credit usage (as per the option in Box 5), and not as a participation barrier to its Scope 3 Claim framework. FincoEnergies suggests VCMI takes this more inclusive approach, enabling the participation of companies with gaps >24% but otherwise satisfy all of the Scope 3 Claim framework requirements. Generally, we believe there should be a strong focus on encouraging participation in the framework to maximise its uptake, upscaling and thus impact.	Step 3: Meet the required carbon credit use and quality thresholds	FincoEnergies
As per our Box 5 feedback, while we do not raise concerns regarding the rational of the 24% number itself, we disagree that it be used as a limit beyond which there is a barrier to participation in the Scope 3 Claim framework. Instead we suggest that VCMI retains the 24% as solely a cap on credit usage (as per the option in Box 5), and not as a participation barrier to its Scope 3 Claim framework. FincoEnergies suggests VCMI takes this more inclusive approach, enabling the participation of companies with gaps >24% but otherwise satisfy all of the Scope 3 Claim framework requirements. Generally, we believe there should be a strong focus on encouraging participation in the framework to maximise its uptake, upscaling and thus impact. Survey question submission.	Step 3: Meet the required carbon credit use and quality thresholds	FincoEnergies
The threshold of 24% allows companies to maintain a significant portion of their Scope 3 emissions and would even let some companies increase their emissions in the short term. By permitting companies to offset their emission gaps (by any percentage) for the next 14 years risks causing mitigation deterrence. Moreover, it risks serving as a loophole that weakens the incentive to tackle the much-needed Scope 3 emissions. Companies may believe that by staying within the 24% gap, they are meeting expectations, leading to a complacency around taking stronger actions. It overshadows companies that are the front runners in emission reductions, not differentiating with those companies that do not make efforts.	Step 3: Meet the required carbon credit use and quality thresholds	ECOS
We suggest that the gap limit in the Scope 3 Claim, in comparison to the previously published 'Scope 3 Flexibility Claim', is a more appropriate threshold to establish. There is a risk that implementing a stricter limit could result in a small number of eligible companies.	Step 3: Meet the required carbon credit	MSCI

Comments (compiled)	Section of the Claim	Respondent name/ organisation
	use and quality thresholds	
It would be beneficial to consider making recommendations for companies that exceed this threshold. For instance, if a company's emissions gap is 26%, it should not simply refrain from purchasing credits. Providing clear recommendations or a pathway for such companies could encourage them to buy credits now and in the future, even if they are not yet eligible to make a Scope 3 Claim. This approach would foster a proactive stance towards emission reductions.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
The 24 % is based on a Well Bellow 2 Degrees (WB2D) scenario. Using this scenario as a comparison already gives a bigger gap because the gap analysis should be done on the 1.5°C scenario.	Step 3: Meet the required carbon credit use and quality thresholds	WWF
The 24% threshold is an arbitrary threshold. We believe that this single study is insufficient justification for basing the entire framework on this 24% threshold. Further, as the study is likely skewed due to sampling bias (i.e. only companies already committed to reducing Scope 1, 2, and 3 were studied) and the likelihood that the upper quartile faces significant decarbonization challenges, the 24% limit likely excludes many companies making genuine efforts but struggling due to the complexity and cost of reducing Scope 3 reductions in their value chains. In addition, because the 24% figure is based on a theoretical pathway for a select group of companies, this figure may rely on assumptions regarding a amounts of renewable power and new grid connections that are theoretically possible for each company but collectively unrealistic. Excluding the upper 10% or outliers in determining the emissions gap limit may better accommodate sectors or companies with structural or technological barriers. The goal of the Scope 3 flexibility claim is to encourage companies to get back on track with their emission reduction targets while also supporting climate action projects. The threshold of 24% limits the number of companies that can use carbon credits to abate their Scope 3 emissions and demonstrate commitment to getting back on track. We support VCMI providing greater flexibility to companies both by raising this threshold to enable more companies to take advantage of the Scope 3 Claim and providing greater flexibility in the phaseout of carbon credits to cover the Scope 3 gap by 2038 More flexibility is needed. We support VCMI providing greater flexibility to companies both by raising this threshold to enable more companies to take advantage of the Scope 3 Claim and providing greater flexibility in the phaseout of carbon credits to cover the Scope 3 gap by 2038.	Step 3: Meet the required carbon credit use and quality thresholds	Anew Climate

Comments (compiled)	Section of the Claim	Respondent name/ organisation
VCMI shall provide flexibility in terms of the scope 3 gap limit and the year to overcome barrier for abating scope 3 emissions.		
The 24% cap on credit usage is too limited In capping credit usage in the Scope 3 Claim, VCMI has adopted a maximum credit limit of 24% of a companys Scope 3 emissions. To set this cap, net zero trajectories from hard-to-abate sectors were aggregated and compared to SBTis well below 2 oC emissions reduction commitment. It was determined that the average curve did not exceed 24% of SBTis curve in any year. This methodology was developed for VCMI by Accenture and is detailed in a separate report submitted in August 2024. An average curve of seven sectors smooths out substantial variability in the sector-level pathways relative to the SBTi pathway. Figure 8 of Accentures report indicates this: here, you can see that the largest gap at the sector level exceeds 50 percent, more than double the limit proposed by VCMI. The analysis also does not account for the fact that these sector-level pathways are aggregate modeled scenarios that smooth variability related to geography and other factors. We appreciate the desire to have a set Claim limit. Still, without high-quality data to model corporate emissions pathways within a probabilistic framework, we worry that these limits, laden with opaque assumptions, will do more harm than good. As mentioned above, we are particularly concerned they could discourage companies in the developing world, where access to decarbonization technologies is more limited. VCMI could assemble the data to develop such a model, significantly contributing to creating robust net-zero action. However, without doing such work, no specific limit should be placed on credit use to address a Scope 3 emissions gap. We favor a modified version of the proposal in Box 5 of the Beta Scope 3 Claim report where companies are expected to demonstrate progress on reducing Scope 3 emissions""just as they are expected to do so for their main VCMI claim""while using credits to address their emissions gap in the meantime.	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon
While we understand how the 24% has been derived, its current justification adds unnecessary complexity that may make this requirement irrelevant over time. If there is a need for a threshold, we recommend 25% simply for ease of use and application for the user.	Step 3: Meet the required carbon credit use and quality thresholds	Accela Research

Comments (compiled)	Section of the Claim	Respondent name/ organisation
No comment here on validity of 24%, but the source/ analysis below of how 24% was reached as a guardrail should be clearly documented and published - as it appears to be quite arbitrary. Our research into Fortune Global 500 companies with SBTi net zero targets that were reducing their Scope 3 emissions found that, on average, they are reducing them by 6% year on year, but reductions are not linear and fluctuated off that reduction by an average of +/-13% of total emissions per year (https://climateimpact/fg500) As above.	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
The goal of the Scope 3 flexibility claim is to encourage companies to get back on track with their emission reduction targets while also supporting climate action projects. The threshold of 24% limits the number of companies that can use carbon credits to abate their Scope 3 emissions and demonstrate commitment to getting back on track. We support VCMI providing greater flexibility to companies both by raising this threshold to enable more companies to take advantage of the Scope 3 Claim and providing greater flexibility in the phaseout of carbon credits to cover the Scope 3 gap by 2038 Can we make this simpler? For many companies, the business case that underpins climate action in accordance with climate claims is premised on consumers, employees and other stakeholders understanding the action. Those stakeholders have a(n ever) short(er) attention span. So it would support the success of this claim if there was a more concise explanation and/or visual representation for the above rationale.	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
On the contrary, the Scope 3 Claim could reward the laggards who are not making sufficient efforts to reduce scope 3 emissions by permitting them to exaggerate their inadequate efforts to the detriment of genuine climate leaders. As a result, companies with increasing emissions will continue to greenwash their inaction and deteriorating performance, preserving business-as-usual. For example, the 2024 Corporate Climate Responsibility Monitor (CCRM) highlights various companies, such as Volvo Group, who have heavily invested in - and implemented - ambitious climate actions along their value chains. According to the CCRMs lead authors at NewClimate Institute, the Scope 3 Claim could "enable[...] laggard companies that have not undertaken similar efforts to misleadingly appear to be making similar progress towards ambitious-sounding targets"□.	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch
24% flexibility: The 24% flexibility is far too high of an allowance. If companies were to embrace this high-level of flexibility instead of decreasing their indirect emissions, it would severely threaten our global climate goals. An even more concrete illustration of how this 24% flexibility allowance can affect, for example, SBTi-certified scope 3 corporate 2030 targets can be found in the following graph in a post published by NewClimate Institute. NewClimate tested the	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch

Comments (compiled)	Section of the Claim	Respondent name/ organisation
application of VCMis Scope 3 allowance on 16 companies analysed in the 2024 Corporate Climate Responsibility Monitor and found that the "Scope 3 Claim could further weaken the already insufficient 2030 targets of most companies [and that the 24%] allowance could reduce scope 3 targets to levels that are critically insufficient for achieving sector-specific trajectories needed to limit global warming to 1.5°C"□. The following changes should be implemented: -If VCMI insists on moving forward with this flawed framework based on some sort of flexibility allowance, it must be significantly less than 24% to strengthen this supposed guardrail;		
We support limiting the emissions gap and we are satisfied with VCMIs substantiation of the 24% limit. However, from a comms perspective, 24% could sound arbitrary and VCIM could consider using 25%. No further comments	Step 3: Meet the required carbon credit use and quality thresholds	Perspectives Climate Research
Similar to the above response, it is difficult to assume that 24% is a reasonable standard across industries if the data it is based on is from seven hard-to-abate sectors. It is also difficult to assume a linear or clean trajectory for companies reduction efforts. Furthermore, as a 24% maximum acceptable emissions gap excludes the top 25% companies with the largest gaps from the possibility of making a Scope 3 Claim, it seems a missed chance at providing the 25% largest companies with an opportunity in participating in Scope 3 with VCMI.We suggest further research before settling on 24%. See above comments.	Step 3: Meet the required carbon credit use and quality thresholds	American Forest Foundation
1. Excluding the upper 10% or outliers in determining the emissions gap limit may better accommodate sectors or companies with structural or technological barriers. This would still set a firm limit while better accommodating sectors or companies with structural or technological barriers, making the guardrail more inclusive and reflective of varying decarbonization capacities across industries. Moreover, the 24% amount is set by an average of a theoretical pathway for a select group of hard to abate industries. The pathways for the selected industries are theoretical as each of them relies on an unrealistic amount of renewable power and grid connections, which collectively is unlikely to be available for each industry. It also ignores the numerous industries which are above the 24% average. Thus we suggest the percentage should account for sector specific consideration and be re-evaluated should the collective targets still not be achieved in the future. Also, VCMI should also have some sort of pathway for the companies that will still not be on the pathway even with the 24%. 2. The Climate Board's "Corporate Engagement with the Voluntary Carbon Market Claims" report presents a different result than SBTi's company level data from their SBTi 2022 Monitoring Report (although this detail was not provided). TCB's report documents the realities faced by companies in meeting this challenge - that most corporations are focused on executing Scope 1 and 2 strategies and 70% were facing challenges. Of the 40% of respondents who had Scope 3 targets, 93% were facing critical challenges. This report indicates that corporations are already facing challenges which will not lessen as the their target	Step 3: Meet the required carbon credit use and quality thresholds	IETA

Comments (compiled)	Section of the Claim	Respondent name/ organisation
pathway gets more difficult each year. 2. Threshold: Provide an inclusive approach to allow all companies benefit from the approach and clarify why the top 25% companies with the largest gaps are excluded from the possibility of making a Scope 3 Claim. Reconcile the difference between The Climate Board's results and the Accenture's report. 1. Remove the threshold restriction. Text proposal: "VCMI provides an inclusive and flexible approach to allow all companies to take action to cover the entirety of their scope 3 emissions gap. There is no limit on the use of carbon credits to allow companies to cover their whole emissions gap with carbon credits, provided that their targets are science aligned"□.		
The change from 50% to 24% does not support adoption of VCMI claims nor promote the use of carbon credits. Flexibility must be maintained in the short term to drive adoption of claims and increased disclosure on emissions and use of credits. This will increase the sample size and provide improved insight to adjust thresholds in future. We agree with the logic behind the 24% emissions gap limit for making a Scope 3 Claim, as it aligns with the ambitious decarbonisation pathways outlined by the Mission Possible Partnership and the SBTi. However, we believe that excluding companies with emissions gaps larger than 24% from the possibility of purchasing high-quality carbon credits and continuing to make progress towards their scope 3 emissions reduction targets is counterproductive. Such a restriction could limit the impact of carbon credit initiatives and discourage companies from taking ambitious climate action. We propose that companies with larger emissions gaps should be encouraged to purchase high-quality carbon credits to supplement their internal decarbonisation efforts. This approach can help to accelerate emissions reductions, support climate-positive projects, and contribute to the overall transition to a low-carbon economy. By allowing companies with larger emissions gaps to purchase carbon credits, we can: • Encourage ambitious climate action: Provide companies with a tool to make a meaningful contribution to climate mitigation, even if they face significant challenges in reducing their own emissions. • Support climate-positive projects: Redirect financial resources to projects that remove or reduce carbon from the atmosphere today. • Drive innovation: Incentivise the development of new technologies and practices that can help to address the challenges of reducing scope 3 emissions. While it is important to ensure that companies are making genuine efforts to reduce their emissions, we believe that a more flexible approach to carbon credit use can help to maximise the impact of these initiatives and drive progress.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonplace

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The 24% percentage was derived from a well-researched and thoughtful approach, averaging target gaps among the majority of high-performing companies that disclosed to SBTi and CDP, both reputable sources. We believe that the percentage and timeline presented are both ambitious and pragmatic.	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
Conservation International would encourage greater flexibility for the gap limit (presently 24%) to accommodate for companies with current gap greater than the threshold but ready to take action now and invest in NCS. We appreciate the rationale that has gone in design of the gap limit and it would be good to explore the feasibility with piloting the scenarios reflective of greater flexibility and moving forward depending on the feedback received. Also, the percentage of gap limit is not as critical as ensuring the companies making claims follow the mitigation hierarchy while investing in carbon credits. Conservation International has been successfully implementing the approach with the corporate partners investing in NCS by adhering to CI's Principles for Investment in NCS.	Step 3: Meet the required carbon credit use and quality thresholds	Conservation International
It would be helpful for VCMI to provide (perhaps in appendix) a more detailed graphic showing the full results of the MPP and SBTi analyses to allow the reader to see the distribution of performance for SBTi and what the implications of setting the threshold at other levels could have been (30%? 40%? etc)	Step 3: Meet the required carbon credit use and quality thresholds	Conservation International
The NCSA / FIC feedback is that the 24% threshold could be constraining, as it would exclude a great portion of businesses that have challenging Scope 3 emissions. We would therefore suggest to explore 2 different options as part of the road-testing phase: • A higher threshold (for example based on same studies but removing outliers) combined eventually with the carbon budget approach (box 6) (however the carbon budget approach won't allow for a phasing out early on credits)	Step 3: Meet the required carbon credit use and quality thresholds	WBCSD - The NCS Alliance
The NCSA / FIC feedback is that the 24% threshold could be constraining, as it would exclude a great portion of businesses that have challenging Scope 3 emissions. We would therefore suggest to explore 2 different options as part of the road-testing phase: • Replace the quantitative threshold, with a request for a transparent disclosure and explanation (including on how they define hard to abate emissions) of what the estimated gap is and a plan demonstrating how the company is addressing the challenges, with a clear indication of the timeline for returning on track.	Step 3: Meet the required carbon credit use and quality thresholds	WBCSD - The NCS Alliance

Comments (compiled)	Section of the Claim	Respondent name/ organisation
First, see our comment on Box 3. We assume that the guardrails are the annual 24% carbon credit use ceiling during the period of the near term target, and that this use can extend to 2038. We do not agree that these guardrails will incentivize "immediate action" to reduce Scope 3 emissions in a near term science-based target. The guardrails would allow too much time for delayed Scope 3 reduction actions IATP strongly disagree that VCMI should prime the pump for the purchase of carbon credits that are not CCP labeled.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy
(based on explanation given by VCMI that this would exclude the top 25% of emitters roughly)	Step 3: Meet the required carbon credit use and quality thresholds	ClimatePartner
The Scope 3 Claim presents itself as a standard that companies can achieve by making calculations as outlined in Figure 3, p. 19. The 24% cieling for the use of "high integrity" carbon credits to substitute for absolute emissions cuts is "based on an analysis of the Mission Possible Partnership (MPP) mitigation pathways data [from about 200 companies] for seven hard-to-abate sectors: aluminium, concrete & cement, chemicals, steel, aviation, shipping and trucking." (p. 18). This analysis, excluding the 25 highest Scope 3 emitting companies, is then compared to the mitgation pathways of over 1200 SBTi committed companies to arrive at the 24% ceiling. It is difficult to assess whether companies are making meaningful progress on their SBTi targets, when the Scope 3 claim is derived from MPP data of a smaller number of companies, some of whom are not SBTi committed. SBTi committed companies that use the Scope 3 claim may reduce their Scope 3 reduction ambition by buying "high integrity" carbon credits under the tems of the Scope 3 Claim within a target bountary year is cheaper and less operaitonally risky than making large and long term investments to reduce their absolute emissions.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy

13 Other guardrails

Comments (compiled)	Section of the Claim	Respondent name/ organisation
I find that the fact that companies would be able to increase their emissions and still make a claim problematic. Unless you make the claim less misleading like "scope 3 offsetting claim".	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson
Several of these illustrations show companies using the claim that have increasing scope 3 emissions. This contradicts with the narrative used to introduce the claim, which is that the claim is for use by companies that are working hard but struggling, perhaps for reasons beyond their control, to reduce their emissions in line with their trajectories. Some of the illustrated examples show emissions increasing by 20% from baseline, which is more of a "business-as-usual" scenario, or worse, than a "making best efforts" scenario. This is a fundamental problem with the claim in our view because the reputations of the companies that use the claim, in terms of how committed they're perceived to be to reducing emissions, will determine its credibility.	Step 3: Meet the required carbon credit use and quality thresholds	Claire Wigg
Broadly agree but as stated in feedback to other sections we would recommend reviewing the guardrails again. Is there a view that meeting the criteria for making a scope 3 claim is strong enough? Guard rials are needed but as written we are concerned that they could deter companies that cold make a claim from doing so and also bar too many other companies from making the claim, both now and in the future. This could in turn have a cooling effect on the purchase of credits/amount of vital near term climate action.	Step 3: Meet the required carbon credit use and quality thresholds	Philip Brady
We also recommend that VCMI put a process in place to test whether the guardrails are enabling the intended balance between upholding integrity and including more companies. For example, VCMI carries out a biennial stocktake on the effects of these guardrails, with potential to modify the guardrails if needed.	Step 3: Meet the required carbon credit use and quality thresholds	Philip Brady
In our view these may be "guardrail requirements" but they're primarily "requirements" and should be stated as such. Also we think it's very unfortunate that the illustrative examples for companies using this claim (figures 4 and 5) show companies' emissions increasing. This sends the message that this claim is fine for use by companies whose emissions are increasing. The target group for use of this claim should be companies that are making serious efforts to reduce their scope 3 emissions but aren't reducing quite as quickly as they should. Otherwise the use of the claim will contradict the statements that it"does not imply the substitution of emissions reductions by the retirement of carbon credits." If launched as proposed, which companies use the claim will be critical to the claim's credibility.	Step 3: Meet the required carbon credit use and quality thresholds	Claire Wigg

Comments (compiled)	Section of the Claim	Respondent name/ organisation
1. The Core methodology for the Claim 1.1 Progressive Reduction Pathway - Introduce Clear Milestones Setting mandatory intermediate reduction milestones (e.g., a 5% reduction every 5 years in the Scope 3 emissions gap). This would prevent companies from deferring action and ensure that reductions are spread more evenly over time. no changes, just suggestions - Introduce Clear Milestones Setting mandatory intermediate reduction milestones (e.g., a 5% reduction every 5 years in the Scope 3 emissions gap). This would prevent companies from deferring action and ensure that reductions are spread more evenly over time.	Step 3: Meet the required carbon credit use and quality thresholds	Seagrass Ltd
The sheer volume of offsets that will be required in the market to meet the demands from multiple companies will be significant. Our view is that offset claims should only be made after a period (~5years) of a company actioning and reviewing the success of its scope 3 decarbonisation strategy. As above	Step 2: Meet the Scope 3 Claim requirements	Accela Research
A companys emissions may fluctuate depending on the year for several reasons. However, a linear trajectory is important to ensure there is a constant aim toward emission reduction. Accepting non-linear trajectories could risk seeing situation where a company increases its emissions for an extended period of time, without having the incentive to invest in emission reduction activities and tools to ensurea constant reduction, sufficient to reach net zero by 2050. If a company with a target to reduce its scope 3 emissions by 50% between 2025 and 2035. Due to the 24% flexibility allowance in addition to VCMIs provision for companies to chart a non-linear pathway towards their targets, this company would be able to steadily increase its emissions for the first half of the target period up to 2030 while still qualifying for the VCMI Scope 3 Flexibility Claim.	Step 3: Meet the required carbon credit use and quality thresholds	ECOS
Even so, when combined with the 24% flexibility allowance, there is still a chance that companies steadily increase emissions for the first half of the target period up to 2030 while still using the VCMI Scope 3 Claim (as previously pointed out). Please see the responses to the survey questions.	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch
The pathway is logical and clear. However, to promote early adoption and use by corporates, Step A and B should be sufficient to make a base claim which would include disclosure on emissions, target, and use of credits. C and D could be added in a subsequent reporting year.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonplace

Comments (compiled)	Section of the Claim	Respondent name/ organisation
As answered in Step 2, using intensity targets is not accurate for carbon accounting as it does not represent the actual increase or reduction of emissions. If a company decides to calculate its emission gap as presented by VCMI, this could be used to review their transition plan, its strategy and actions to make sure they can reduce the emissions to reach their interim and long term targets. The calculation should not be used to estimate the amount of carbon credits a company is eligible to use, as this would not address the need for reducing the emissions but rather risk distraction from physical actions	Step 3: Meet the required carbon credit use and quality thresholds	ECOS
VCMI should update these guardrails periodically as new research comes out on the challenges and progress of corporate deacarbonization.	Step 3: Meet the required carbon credit use and quality thresholds	The Nature Conservancy
The framework would be more effective if claims were allowed only after a company has developed and implemented a clear decarbonization strategy which identifies short-term (1-5 year) actions to reduce scope 3 emissions. This strategy should identify minimum ambition and key emission sources within the value chain, linking them to decarbonization actions as outlined in our Climate Value Chain framework. (https://www.accelaresearch.com/research/climate-value-chain-framework). For example, a company would begin with a 5-year decarbonisation plan targeting the most significant emission sources. As they progress, they would identify and report on progress, barriers, and the changes needed to overcome them. After this 5-year period, they could make a Scope 3 claim, provided their next plan seeks to address these barriers. To ensure progress, targets should be tied to remuneration, with companies required to show measurable decarbonization efforts before considering offsets.	Step 3: Meet the required carbon credit use and quality thresholds	Accela Research
We understand VCMIs proposed Scope 3 Claim will lead to a slowing down in progress towards global net-zero, rather than an acceleration. Companies which use the Scope 3 claim are likely to be distracted from, or encouraged to delay, action on direct mitigation and reduction of their supply chain emissions. Furthermore, we are concerned that use of the Scope 3 claim by some companies risks undermining the more robust actions of frontrunner companies. Although it has been claimed in a number of studies thatpurchase of credits is positively correlated with faster internal decarbonisation, closer scrutiny of these findings have revealed them to be largely unreliable (Carbon Markets Watch, 2023). The VCMI Scope 3 Claim will distract from and delay short term action by allowing companies to increase their emissions in the near term. A company with a target to reduce their Scope 3 emissions by 50% between 2025 and 2035 could conceivably increase its absolute emissions between 2025 and 20230 by making full use of the24% flexibility allowance and VCMIs provision for companies to chart a non-linear pathway towards their targets. Although the carbon	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous

Comments (compiled)	Section of the Claim	Respondent name/ organisation
budget requirements would require the company to reduce emissions between 2030 and 2035, companies could backslide on their targets having already benefitted from VCMI's validation of their 'climate action' for five years. Thus, the flexibility claim can can enable companies to distract from and delay meaningful action on climate in the next crucial years.		
The scope 3 claim offers an acceptable level of flexibility through the (limited) use of carbon credits. However, the requirements should not be loosened further.	Step 3: Meet the required carbon credit use and quality thresholds	ClimatePartner
It is not clear how the 24% gap was determined and how the 2038 year was chosen. Please add additional details explaining the logic behind these two numbers	Step 3: Meet the required carbon credit use and quality thresholds	Bayer Crop Science
In general, the Scope 3 Claim methodology is not clear and easy to understand. VCMI should clarify how the 24% threshold and the credits phase out year 2038 were set.	Step 3: Meet the required carbon credit use and quality thresholds	RWEST
Guardrails in place for the use of high-integrity carbon credits To enhance the guardrails for high-integrity carbon credits, we suggest that firms be encouraged to adopt a single accounting system that is fungible with international carbon credit systems. Achieving this will require the implementation of several key actions, including: Fungibility with Article 6 Firms should ensure that their use of carbon credits is consistent with Article 6 of the Paris Agreement. This means that credits counted as "offsets"□ and even under voluntary schemes would eventually fungible with compliance markets, thus increasing the value and credibility of the claims. This would also promote seamless integration across various carbon markets and avoid the issue of "parallel markets"□ with inconsistent quality or accounting methods. To achieve fungibility, firms should ensure that their offsets are either subject to corresponding adjustments, which would avoid double counting, or they should phrase their offsets as "mitigation contributions"□ as per the Article 6.2 guidance. Guardrails in place for the use of high-integrity carbon credits To enhance the guardrails for high-integrity carbon credits, we suggest that firms be encouraged to adopt a single accounting system that is fungible with international carbon credit systems. Achieving this will require the implementation of several key actions, including: Fungibility with Article 6 Firms should ensure that their use of carbon credits is consistent with Article 6 of the Paris Agreement. This means that credits counted as "offsets"□ and even under voluntary schemes would eventually fungible with compliance markets, thus	General	Seagrass Ltd

Comments (compiled)	Section of the Claim	Respondent name/ organisation
increasing the value and credibility of the claims. This would also promote seamless integration across various carbon markets and avoid the issue of "parallel markets" with inconsistent quality or accounting methods. To achieve fungibility, firms should ensure that their offsets are either subject to corresponding adjustments, which would avoid double counting, or they should phrase their offsets as "mitigation contributions" as per the Article 6.2 guidance. Guardrails in place for the use of high-integrity carbon credits To enhance the guardrails for high-integrity carbon credits, we suggest that firms be encouraged to adopt a single accounting system that is fungible with international carbon credit systems. Achieving this will require the implementation of several key actions, including: Fungibility with Article 6 Firms should ensure that their use of carbon credits is consistent with Article 6 of the Paris Agreement. This means that credits counted as "offsets" and even under voluntary schemes would eventually fungible with compliance markets, thus increasing the value and credibility of the claims. This would also promote seamless integration across various carbon markets and avoid the issue of "parallel markets" with inconsistent quality or accounting methods. To achieve fungibility, firms should ensure that their offsets are either subject to corresponding adjustments, which would avoid double counting, or they should phrase their offsets as "mitigation contributions" as per the Article 6.2 guidance. no changes, just suggestions.		
Harmonization with NDCs: The Scope 3 claim process could incentivize companies to contribute to national climate goals by prioritizing projects within countries where emissions reductions align with NDC targets. This would foster stronger ties between corporate action and national climate strategies, creating a more holistic approach to emissions reduction. Harmonization with NDCs: The Scope 3 claim process could incentivize companies to contribute to national climate goals by prioritizing projects within countries where emissions reductions align with NDC targets. This would foster stronger ties between corporate action and national climate strategies, creating a more holistic approach to emissions reduction. no changes, just suggestions.	General	Seagrass Ltd

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Single Accounting System Developing a system where both voluntary carbon credits (used for Scope 3 emissions) and compliance credits (used for NDCs or Article 6) tracked in the same registry would ensure a seamless approach to global climate targets. This could be achieved by linking voluntary carbon credit registries with those of compliance markets or requiring that all voluntary credits are transparently disclosed in national inventories. Single Accounting System Developing a system where both voluntary carbon credits (used for Scope 3 emissions) and compliance credits (used for NDCs or Article 6) tracked in the same registry would ensure a seamless approach to global climate targets. This could be achieved by linking voluntary carbon credit registries with those of compliance markets or requiring that all voluntary credits are transparently disclosed in national inventories. Single Accounting System Developing a system where both voluntary carbon credits (used for Scope 3 emissions) and compliance credits (used for NDCs or Article 6) tracked in the same registry would ensure a seamless approach to global climate targets. This could be achieved by linking voluntary carbon credit registries with those of compliance markets or requiring that all voluntary credits are transparently disclosed in national inventories. no changes, just suggestions.	General	Seagrass Ltd

Comments (compiled)	Section of the Claim	Respondent name/ organisation
We agree with the gap limit based on current scientific knowledge. In addition, the scope 3 emissions gap may change depending on the progress of decarbonisation worldwide in the future, so we would like to regularly review these figures.	Step 3: Meet the required carbon credit use and quality thresholds	TOKYO GAS CO.,LTD.
The phased approach of allowing companies to make Silver, Gold, and Platinum Carbon Integrity Claims after the phaseout of Scope 3 emission gap is a well-structured guardrail to ensure the mitigation hierarchy.	General	Nomura Research Institute, Ltd. Financial Technology Solution Division
The VCMI could consider explicitly identifying additional guardrails to ensure that companies with rising Scope 3 emissions are not allowed to make claims without demonstrating effective efforts to reduce their emissions. For instance, the VCMI could introduce a guardrail that stipulates that not only must the emissions gap decline in absolute terms over time, but also the volume of carbon credits utilized. Alternatively, it could be made explicit that the Scope 3 emissions gap as a percentage, even if already under 24%, must continue to decrease over time. For example, a company with a 20% emissions gap should not be permitted to make a claim if its emissions gap increases to 22% in a subsequent year.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
We recognize that, given that the emissions gap is linked to the interim target and is expressed as a percentage, the emissions gap will naturally decline other time. However, the VCMI could introduce additional guardrails to ensure that companies with rising Scope 3 emissions—suggesting that they are not effectively addressing the barriers to Scope 3 emission reductions—are not able to make claims that could undermine the integrity of the mechanism. However, it is more important to prioritize the reduction of companies' Scope 3 emissions gaps and overcoming the barriers to Scope 3 emission reductions, than to avoid the possibililty that a company whose emissions increased significantly might be able to make a Scope 3 Claim for a single year. Therefore, implementing guardrails to ensure that companies take action, that such actions are effective, and that the threshold continues to decrease over time should be considered more critical requirements in the standard than establishing a stricter threshold for Scope 3 Claims made today. We recommend that the VCMI clearly outline in the Scope 3 Claim documentation how this threshold was determined, ensuring that it is evident that the level was established based on a robust set of criteria.	Step 3: Meet the required carbon credit use and quality thresholds	MSCI
Companies should take responsibility for remaining emissions not just their emissions from their missed targets. Supporting copensation just for missed targets risks disincentivising the channeling of finance into beyond value chain mitigation activities that have the potential to protect and restore nature's carbon sinks or drive market transformation.	Step 2: Meet the Scope 3 Claim requirements	WWF

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Ultimately, getting the incentives right for maximal efforts on value chain decarbonisation is key. Any guidance on the guardrails must address perverse incentives, such to prevent a company from assessing the options whether or not it should value in value chain reduction or just make the VCMI scope 3 claim. Theoretically, even with the guardrails the company could even have higher emissions than in the reference year and still be able to make the claim (as long as it is within the 24% gap) - this needs to be addressed.	Step 2: Meet the Scope 3 Claim requirements	WWF
Under the current guardrails, companies can still make a scope 3 claim without meeting any SBTi near term targets until after 2038 when credits are phased out. This loophole needs to be addressed -	Step 2: Meet the Scope 3 Claim requirements	WWF
Overall,he guardrails that VCMI has listed are insufficient. Mitigation hierarchy: VCMI states that the guardrails exist to ensure that the mitigation hierarchy principle is respected in the context of the Scope 3 Claim. Permitting the use of carbon credits to "address" scope 3 emissions, however, is instead undermining this principle. This point was raised in an open letter on the use of carbon credits to meet Scope 3 targets signed by various civil society organisations and the scientific community: "Scope 3 emissions are inherently part of a companys footprint. Disaggregating that footprint into categories does not make it more acceptable to meet internal reductions targets with external reductions. This approach is counterproductive, and largely backed by actors with direct financial interests in allowing this flexibility". The following changes should be implemented: -VCMI should not claim that this Framework upholds the mitigation hierarchy;	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch
VCMI should also consider a learning-by-doing approach where these guardrails could be shifted if and when new evidence becomes available.	Step 3: Meet the required carbon credit use and quality thresholds	Perspectives Climate Research
Due to the low sample sizes and underrepresentation of corporates, restrictions on the use of credits should be phased in slowly. VCMI must promote adoption of the claims and support demand for carbon credits. Although we support driving decarbonisation, we firmly support use of credits and increasing demand for credits as a key pathway to NetZero and beyond. Once a corporate has addressed the emissions gap, the use of credits can be promoted to go beyond the target.	Step 3: Meet the required carbon credit use and quality thresholds	Carbonplace

Comments (compiled)	Section of the Claim	Respondent name/ organisation
See above comment in support of the modeling conducted, which derived the percentage of the emissions gap limit and the timeline for the complete phase-out by 2038. While we agree on rationale for phaseout date, the fact that the "scope 3 emissions gap must decline over time "□ is probably too vague to ensure enforcement. A company could be required to decrease the gap a certain % every year, say 1-2%. There should at least be some milestones between the time the claim is made and the 2038 phase out. Consider suggestion above. We dont suggest any changes to the text.	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
IATP believes than an undisclosed assumption underlies the "gap limit" analysis, namely that carbon dioxide removal (CDR) technologies will be technologically and economically successful and scale up (with massive government subsidies, tax credits, research support, regulatory exemptions to expedite consturction and operation and policy "flexibility") to remove Scope 3 reduction barriers "entirely". VCMI has commissioned Accenture econometric research that projects a USD 30/MT CO2 equiv. price by 2030 in a policy scenario in which supply demand factors for CDR credits drive and sustain this price. IATP believes that VCMI should be explicit with prospective credit buyers about this policy scenario and its economic and scientific risks. Several econometric studies, e.g. by Bloomberg NEF, assume that credits deived from biogenic offset projects will continue to be on the market at least through 2040. During this time, the computer modeled global warming assymetry between fossil fuel emissions and biogenic sinks, reported by the IPCC and in Nature, will continue to grow. As a result, any degree of barrier removal by credits derived from CDR technologies will be reduced by this assymetry, which does not model the economic and physical impacts of climate tipping points. Box 4 does not substantiate the statement that by 2038 companies using the Scope 3 claim will be able to "address" their Scope 3 barriers "entirely." It is not possible to correct this statement with text changes without vitiating the Box 4 claim's analysis. A MPP pathway data analysis that externalizes climate science will result in a Scope 3 Claim that credit buyers are unlikely to trust.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy
Assuming the current guardrail requires decline in credits over time give more flexibility to companies who start farther off track than for companies who are only slightly off track. This could disincentivize participation of companies that are nearly on track. Changing the guardrail to incentivize participation for both nearly and further off track companies. An alternate method could require that a company doesn't increase absolute emissions YoY or a more flexible approach on the "decline over time" Change to methodology that would provide equal incentives to all companies regardless of the gap size in scope 3 emissions (within the boundary of 11-24%).	Step 3: Meet the required carbon credit use and quality thresholds	Conservation International
The Scope 3 Claim in combination with the non-linear trajectories can be extremely problematic in certain circumstances. Take, for example, a company who has a target to reduce scope 3 emissions by 50% between 2025 and 2035. NewClimate Institute states that "[...] Due to the 24% flexibility allowance in addition to VCMIs provision for companies to chart a non-	Step 3: Meet the required carbon credit use and quality thresholds	Carbon Market Watch

Comments (compiled)	Section of the Claim	Respondent name/ organisation
linear pathway [emphasis added] towards their targets, this company would be able to steadily increase its emissions for the first half of the target period up to 2030 while still qualifying for the VCMI Scope 3 Claim".		

14 High quality carbon credits

Comments (compiled)	Section of the Claim	Respondent name/ organisation
We at Foton Energy appreciate the opportunity to provide feedback on the Scope 3 beta tool. Our key recommendation pertains to the use of International Renewable Energy Certificates (IRECs) in addressing Scope 3 emissions. We believe IRECs, typically used to mitigate Scope 2 emissions, can also play a strategic role in Scope 3 accounting, under the following rationale: Alignment of Scope 2 and Scope 3 Emissions Company As Scope 3 emissions include the Scope 1 and Scope 2 emissions of Company B (a supplier or partner). If Company B uses IRECs to offset 100% of its Scope 2 emissions, these emissions can effectively be accounted as zero. Simplified Accounting and Quality Assurance This leaves only Company B's Scope 1 emissions as relevant for Company As Scope 3 reporting. No further conversion from MWh to tonnes of COâ,, would be required since Scope 2 is neutralized by the IRECs. The critical factor here is ensuring high-quality IREC schemes are used, particularly international programs that guarantee environmental integrity and alignment with global standards. Integration with Guardrails and 2038 Targets In conjunction with carbon credits, IRECs should be recognized as a necessary component to achieve the Scope 3 decarbonization pathway by 2038. This dual approach""carbon credits and IRECs""will strengthen companies' ability to align with the required guardrails and contribute meaningfully to global climate goals. Thank you for your consideration of this proposal. We look forward to contributing to the next phase of the Scope 3 framework development.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
The insistence on only accepting high-quality credits toward this limited Scope 3 claim is integral to assuring the environmental integrity of this approach. While reliance on programmes with existing accreditation from quality standards like ICVCM and CORSIA is sensible, we would	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous

Comments (compiled)	Section of the Claim	Respondent name/ organisation
encourage VCMI to consider restricting eligibility to durable, measurable removals over avoided or reduced emissions credits based on counterfactuals or subjective baselines. The environmental impact of a carbon credit retired to offset emissions - particularly in the case of fossil emissions - needs to be nearly unimpeachable and of a durability equivalent to that of the emissions source. If nature-based removals are to be accepted, we would encourage their use be limited in a 'like-for-like manner, i.e. only be applicable toward Scope 3 emissions from the fast or biological carbon cycle.		
As part of the inclusion of high-quality credits, we endorse the use of CCP-approved credits, as providing a basis for a uniform standard of quality within the industry and striving to push for greater integrity of the market overall.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
Feedback on Step 3: Meet the required carbon credit use and quality thresholds We would suggest that in order to make the scope 3 flexibility claim, corporates can contribute with high-quality CCP-eligible credits to residual emissions and, in the interim period, retire CORSIA-eligible credits. This would be preferred to an alignment of the company's due diligence process with the ICVCM CCPs as the latter would be connected to higher bureaucratic upkeep and further disincentivize action overall	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
We recommend that a priority should be made to not source emissions avoidance credits and to focus on more durable (non-biogenic) removal credits when credits are used, following the Oxford Principles for Net-Zero Aligned Offsetting. See above.	Step 3: Meet the required carbon credit use and quality thresholds	Libby Blanchard
Are there specific barriers in the industry that may hinder the ability to align with the Core Carbon Principles (CCP) or other requirements?	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
The text mentions high-quality carbon credits, but there's a lack of clarity about what criteria define "high-quality." Given the variety of carbon credit standards in the market (e.g., Gold Standard, Verified Carbon Standard), it's critical that this mechanism sets clear guidelines for what constitutes acceptable credits to avoid accusations of greenwashing.	Step 3: Meet the required carbon credit use and quality thresholds	Hatem Ali
We do not support the Scope 3 Claim's promotion of carbon credits to be used to make emissions reduction claims. Most existing carbon credits do not represent, or overrepresent, climate mitigation outcomes (West et al 2023, Gill-Weihl et al 2024, Probst et al 2023, Cames et al 2016). This quality concern has not yet been resolved through attempts by the Integrity Council for the Voluntary Carbon Market (ICVCM) to identify and label credits as approved by their Core Carbon Principles, as some of the first credits to receive this label have been found to likely not represent additional emissions reductions (Badgley and Chay 2024). Further, approximately 39% of carbon credits in the voluntary carbon market represent emission reductions or removals from the biosphere, and therefore have an uncertain long-term climate mitigation benefit since they can be easily reversed (Haya et al 2024, Cullenward et al 2023). Such emissions reductions or removals will have little climate benefit if they don't persist to peak warming	Step 3: Meet the required carbon credit use and quality thresholds	Libby Blanchard

Comments (compiled)	Section of the Claim	Respondent name/ organisation
(Cullenward 2023). Therefore, as we have previously argued, existing carbon credits should not be used to make emissions reductions claims due to their poor quality (Anderegg and Blanchard 2024, Haya 2020). This promotion of the purchase of carbon credits to be used to make emissions reduction claims is a notable shift from the language in the original (2023-released) VCMI Claims Code of Practice, which then only allowed carbon credits to be used to represent "contribution"□ claims. A contribution claim is an assertion of an investment into actions beyond a company's value chain with an expected climate mitigation outcome, without claiming that the resulting emissions reductions or removals "offset"□ their own GHG emissions Contribution claims disallow carbon credits to be counted toward the achievement of value chain emission reduction targets (Blanchard et al 2024).		
High integrity carbon credits provide the clear and credible way to close the scope 3 emissions gap.	Step 3: Meet the required carbon credit use and quality thresholds	Lim Soon Fu Tan
Currently only one type of Corsia credits are available, as all others are for vintages up to 2023. It shall be clear that only time related vintages should be used and not "old" credits that are not possible to be used in CORSIA.	Step 3: Meet the required carbon credit use and quality thresholds	Javier Castro
The text outlines a clear and structured approach for companies to meet carbon credit use and quality thresholds, with a strong emphasis on integrity and transparency.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
Other thanCore Carbon Principles (CCP)-approved or CORSIA credits, Do consider those domestic or regional schemes issued credit but yet got ICVCM 's CCPs approved such as Thailand's TVER, Japan's J-Credit.	Step 3: Meet the required carbon credit use and quality thresholds	Lim Soon Fu Tan
As stated in the feedback to box 3 above, VCMI should stick to the principle that all high-quality credits, which achieve the CCPs (or is CORSIA compliant in advance of ICVCM decision) are equal and fungible. Otherwise this could have implications from market growth/liquidity. We would agree with the principle that credits should closely associated as possible (geography/sector) if the credits were to be included in the companies GHG inventory/count towards scope 3 target. But as they are not in this case then we do not agree with this approach.	Step 3: Meet the required carbon credit use and quality thresholds	Philip Brady
Broadly agree with this approach. It would be simpler if there was only one option pre CCPs Corsia. However this may depend on additional methodologies being approved by CORSIA to ensure enough credits were available. Clear guidance is needed on the second option ' alignment of the company 's due diligence process with ICVCM 's CCPs.	Step 3: Meet the required carbon credit use and quality thresholds	Philip Brady

Comments (compiled)	Section of the Claim	Respondent name/ organisation
I am not a fan personally of HFLD being included in CORSIA for the reasons set out here:https://carbon-pulse.com/156727/	Step 3: Meet the required carbon credit use and quality thresholds	Scarlett Benson
We support both the requirements on purchasing and retiring certain credits. The only caveat is that the second requirement is dependent on other initiatives (CORSIA and ICVCM) which may change their guidance at any time.	Step 3: Meet the required carbon credit use and quality thresholds	Claire Wigg
As part of step 3, we would recommend for the VCMI to include the requirement for companies to purchase projects with carbon credit ratings.	Step 3: Meet the required carbon credit use and quality thresholds	BeZero Carbon
If it were possible to add not only CCP credits but also Article 6 credits and voluntary carbon credits with corresponding adjustments to the credits required, it would be even more useful for accelerating corporate efforts towards global net zero.	Step 3: Meet the required carbon credit use and quality thresholds	TOKYO GAS CO.,LTD.
We appreciate the efforts of VCMI to ensure the reliability of carbon credit. We would also like to support initiatives to use carbon credit in accordance with VCMI. However, we recognise that there are many issues to be addressed, such as the amount of CCP credits, the Japanese domestic system (GX-ETS), and consistency with other initiatives, so we would like to work together to make the VCMI Scope 3 Claim practical. No comments	Step 3: Meet the required carbon credit use and quality thresholds	TOKYO GAS CO.,LTD.
2. Enabling use of commodity certificates to reduce emissions gap Under the Internation Civil Aviation Organizations (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), the use of sustainable aviation fuel (SAF) managed via a book and claim commodity certificate mechanism (SAF certificates) is enabled to reduce emissions and therefore lower the CORSIA offsetting obligation of a company. FincoEnergies suggests that VCMI applies this concept to its Scope 3 Claim framework by explicitly allowing the use of SAF certificates (SAFc) and sustainable marine fuel certificates (SMFc) like FincoEnergies GoodShipping insetting SMFc to reduce the scope 3 transportation emissions of a company, and therefore reducing their emissions gap and hence offsetting obligation under the Scope 3 Claim. This would be consistent with the mitigation hierarchy as the use of SMF/SAF certificates represent a reduction of emissions, not compensation. VCMI could implement this concept via updates to its Scope 3 Claim document in multiple sections, including:	Step 3: Meet the required carbon credit use and quality thresholds	FincoEnergies

Comments (compiled)	Section of the Claim	Respondent name/ organisation
-Adding a specific section or Box explaining and outlining the role SMFc/SAFc can play within the Scope 3 Claim framework; -Adding example calculations in the calculations section; -Within the Step 2 section regarding disclosure of scope 3 reduction actions taken (SMFc/SAFc enabled as scope 3 reduction actions); -Potentially expand the scope of the recommended carbon credit procurement guideline to also include procurement guideline for commodity certificates like SFMc/SAFc for transportation emission reductions. More generally, we also urge VCMI to advocate for such approaches to be adopted more widely in the VCM - particularly by other integral organisations such as the SBTi and GHGP.		
While the VCMI claim has emphasised the need for companies to use high-quality credits, it has not required rigorous project-level assessments and should use this opportunity to require additional scrutiny of carbon projects for use in the Scope 3 Claim. Limiting credit use to those with CCP or CORSIA labels, which are methodology level assessments, still leaves opportunity for variance in the carbon efficacy of the credits. This could also create demand issues for an already limited supply of labelled credits. Instead, a portfolio based approach to carbon-credit risk will mitigate exposure and project-level analysis is critical to the validity of the claim.	Step 3: Meet the required carbon credit use and quality thresholds	BeZero Carbon
VCMI should explain to companies seeking to the use the claim that they should exercise credit type specific due dilgence in buy high quality credit and not simply rely on the CCP label. VCMI should delete the propsoed option to allow use of CORSIA eligible credits as an interim source of Scope 3 Claim eligibile credits, both because CORSIA is a standards floor in much need of ICVCM's "continuous imporovement" and because CORSIA eligible credits are among those that SBTi's review of evidence characterized as "largely ineffective" for reducing GHG emissions. VCMI, though a voluntary standards organization, is not without persuasive power. If comapnies want to use the Scope 3 Claim both for reputational reasons and to support internal emissions reduction and transition planning management, they shoudl be willing to have their estimated annual GHG emissions inventory to be audited by a qualified independent third party, segregated by emissions scope and with an assurance attestation, prior to reporting their data in the four step VCMI Scope 3 Claim calculation.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy

Comments (compiled)	Section of the Claim	Respondent name/ organisation
IATP wishes it were possible to discipline the corporate use of carbon reduction or removal credits by a corporate compliance officer or climate risk manager's use of the Scope 3 Claim requirements and guardrails to achieve the company's net zero target. However too many underlying factors and assumptions in the Claim are lacking or very incipient for the Claim to help companies achieve corproate next zero targets, much less the far more difficult task of helping to "accelerate progress towards global net zero." As VCMI knows, SBTi's systemic review of evidence has concluded that land based credits representing emissions reduction or avoidance have been "largely ineffective" in achieving their contractual claims. ICVCM , VCMI and oher private standards organizations have responded to this dire situation by develping higher integrity reuirements and assessment frameworks to gain the trust of prospective credit buyers. However, these durable carbon storage credits depend in great part of on the technological nd economic success of CDR and other engineering solution based credits. The timeline for the success of these solutions continues to be pushed out further, even with massive and perhaps politically unsustainable public support to "de-risk" private investment. Furthermore, the efficacy of these technological solutions will be strained as governments continue to subsidize fossil fuel production and distribution. None of these impediments to the realization of corporate Scope 3 absolute emissions reductions is, of course, to be solved by Scope 3 Claim compliance. But VCMI should make explicit its assumptions about the CDR development timeline if it wants to make its 2038 guardrail credible to companies and other stakeholders.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy
The ICVCM – this is another barrier to entry. Only a few companies in the world can commit to this level credit assessment and it would make the work of the ICVCM redundant. We want all companies, large and small, to be able to buy carbon credits and make claims. The whole point of the ICVCM's assessment process is that the standards and methodologies have been assessed and those that have the CCP label are deemed fit for purpose. It would be like me buying a television and then taking it apart to self-verify the components.	Step 3: Meet the required carbon credit use and quality thresholds	WBCSD - The NCS Alliance
The VCMI's Scope 3 Claims guidance acknowledges there is disparity in credit quality by specifying the use of 'high-quality' carbon credits. However, the guidance positions carbon credit quality as binary when it should acknowledge that they are instruments that carry varying levels of risk. Carbon credit ratings agencies have developed methods to quantify that risk. The guidance provides incentive for corporations to increase their climate action but limits the ways in which they can do so by constraining carbon credit use to only those with labels from initiatives such as the ICVCM's Core Carbon Principles and CORSIA. Methodology level assessments do not capture project-level nuance which is a crucial component of making credible claims. Ratings are complementary to such quality initiatives and provide additional due diligence via independent risk-based assessments. The VCMI could further refine this guidance by incorporating requirements for ratings of credits used under Scope 3 claims. Leveraging ratings to create a balanced portfolio of carbon credits will enable corporates to effectively account for risk and avoid overexposure to any one sector or geography.	Step 3: Meet the required carbon credit use and quality thresholds	BeZero Carbon
Is there any possibility of adding articles 6 credits, or voluntary carbon credits with corresponding adjustments, as options for the required credits?	Step 3: Meet the required carbon credit use and quality thresholds	TOKYO GAS CO.,LTD.

Comments (compiled)	Section of the Claim	Respondent name/ organisation
FincoEnergies also supports the utilisation of the ICVCM Core Carbon Principles (CCP) to ensure quality of credit supply both because of the integrity of that system, but also for the consistency that adopting the CCP provides to companies. However, FincoEnergies suggests that VCMI considers listing other quality standards/methods as also acceptable, with the key concern here being ensuring adequate supply of quality credits that can be used in the Scope 3 Claim system, including after the cessation of the interim measures outlined.	Step 3: Meet the required carbon credit use and quality thresholds	FincoEnergies
In terms of the interim retirement measures until 1 January 2026 (being retirement of CORSIA eligible credits or company disclosures on how their credit due diligence process satisfies all 10 of the CCPs), FincoEnergies supports this flexibility mechanism. However, given the current low rate of CCP approvals, FincoEnergies suggests 1 January 2027 as a more appropriate date in order to allow sufficient time for CCP-approved credits to become more widely available. FincoEnergies also supports VCMI in reserving the right to amend this date subject to the changes in the availability of CCP-approved credits.	Step 3: Meet the required carbon credit use and quality thresholds	FincoEnergies
Carbon projects should align to internationally recognised carbon standards and methodologies (e.g. programmes that adhere to CORSIA or the Core Carbon Principles provided by the ICVCM - Integrity Council for the Voluntary Carbon Market).	Step 3: Meet the required carbon credit use and quality thresholds	WWF
The carbon credit eligibility criteria discriminate against IP and LCs who want to manage projects themselves. The CCP and CORSIA requirements will, for the foreseeable future, exclude project-based REDD+. This is despite many countries not being ready for jurisdictional REDD+, and the increased risk to community safeguards from jurisdictional programmes. Criteria that allows high quality REDD+ project credits to be used for VCMI claims. For instance, REDD+ projects that meet the Peoples Forests Partnership principles. We also recommend ICROA endorsement criteria of crediting programs as a benchmark of quality.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
We strongly disagree with making this a requirement. In addition, we have these comments on requiring the use of CCP or CORSIA-aligned credits: Requiring CCP or CORSIA labeling risks a supply crunch Our final point of concern is the requirement that credits used to meet Scope 3 Claims have either received the Core Carbon Principles (CCP) label from the Integrity Council on the Voluntary Carbon Market (ICVCM) or been approved under CORSIA, international aviation 's voluntary carbon offsetting program. We think this is a mistake for two reasons. First, the supply of credits approved under these programs is expected to be very limited. Several analyses have already highlighted the strong possibility that neither program will be able to meet the suspected demand. More importantly, however, limiting use to credits tagged with the CCP label or CORSIA eligible risk leaving some high-quality	Step 3: Meet the required carbon credit use and quality thresholds	Rubicon Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
projects off the table. In the case of the CCPs, the set of methodologies submitted for evaluation was self-screened by registries. We already know that this approach will rule out some prominent types of projects, such as REDD+ projects, without any evaluation. REDD+ has undoubtedly received its fair share of scrutiny over the last few years, but our analyses indicate that there are still high-quality projects. We believe these should be available to buyers wanting to make a VCMI claim. CORSIA has a similar issue: the high bar they 've set for risk management, particularly related to corresponding adjustments, is slowing the onboarding process of new registries. A suitable alternative has already been implemented in VCMI 's claims code of practice: allow companies to author disclosures on how the credits they purchase address the requirements of the CCPs. This alternative has been included because the supply of CCP-approved credits is limited. Currently, it is proposed as a transitional measure until the ICVCM can further advance its credit evaluation process. We recommend implementing it as a permanent option in both the claims code and the Scope 3 Claim.		
On the two approaches, I don't think CORSIA should be accepted because is not as robust. Retire only Core Carbon Principles (CCP)-approved credits.VCMI offers companies one approach(which can be implemented until 01st January, 2026) to demonstrate the procurement of high-integrity credits during this transition phase until the Integrity Council for the Voluntary Carbon Markets (ICVCM) CCP-approved credits become widely available in the market. This is the alignment of the company 's due diligence process with ICVCM 's CCPs. For more details and reporting requirements, please refer toVCMI Claims Code of Practice.	Step 3: Meet the required carbon credit use and quality thresholds	Mundys
reformulate to avoid the potential differentiation between credits based on geographical parameters adjust text	Step 3: Meet the required carbon credit use and quality thresholds	BURN manufacturing
It 's currently unclear whether credits already purchased and/or retired and assessed in the past as in line with ICVCM 's CCPs, for the purpose of a future VCMI claim, remain valid for a VCMI claim if an ICVCM assessment is subsequently released and the methodology was rejected. This comment is applicable to the Scope 3 claim and the Carbon Integrity Claim. VCMI has confirmed that this is indeed the case via email, but it would be a useful clarification to help companies with decision-making where carbon credit methodologies have not yet been assessed. We believe that where credits were purchased and/or retired and were assessed as meeting the ICVCM 's CCPs, before the ICVCM 's decision to reject a methodology, they should be permitted for a VCMI claim until 1 January 2026.	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
Requiring all carbon credits used under the Scope 3 claim to have an ICVCM-CCP label or CORSIA eligibility may result in a short term supply issue, limiting immediate scalability of the claim. BeZero Carbon sees market quality initiatives and ratings as complementary, with the methodology level assessment providing an initial appraisal and project-level risk-based ratings providing a detailed evaluation of the underlying project. Allowing alternatives, such as a portfolio approach using ratings, could reduce pressure on existing market initiatives without compromising the impact of the retired credits and validity of the claim.	Step 3: Meet the required carbon credit use and quality thresholds	BeZero Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Our ratings database shows that risks vary at a methodology level, meaning that even under the CCP-label project implementation can result in different outcomes. https://bezerocarbon.com/insights/release-of-first-ccp-labels		
Further clarity is needed on what particularly "alignment of the company 's due diligence process with ICVCM 's CCPs"□ entails.	Step 3: Meet the required carbon credit use and quality thresholds	American Forest Foundation
We encourage companies to be intentional with their choice of carbon credits, considering several factors which tie in with their broader climate and business strategy, such as geographies, SDGs etc. VCMI could provide brief guidance and recommendations on how companies could align their credit purchases with climate-strategy, however VCMI should avoid implementing requirements or restrictions. Carbon credit purchase strategies vary significantly between companies, and likewise supply and demand mechanisms within the voluntary carbon market are complex. Introducing requirements or restrictions (beyond quality-requirements) on the type of credits that could hinder decision making or climate action. As organisations increasingly transition to longer-term carbon-purchase strategies or project development, they are making decisions which will provide supply of carbon credits for use many years into the future and so these projects could be derailed or adversely impacted.	Step 3: Meet the required carbon credit use and quality thresholds	Climate Impact Partners
The VCMI Scope 3 Claim document indicates that after January 1, 2026, claims could be substantiated solely through the purchase of carbon credits labeled with the Core Carbon Principles (CCP) certification. However, there are ongoing concerns about the CCP label, particularly regarding its lack of a requirement for host-country authorization under Article 6 of the Paris Agreement. Host-country authorization is crucial because it ensures that carbon credits are aligned with the country 's Nationally Determined Contributions (NDCs), safeguarding the integrity of the credits. Without this authorization, there is a risk of "double counting," where both the host country and the purchasing company claim the same carbon reductions. This undermines the overall integrity of the carbon market and diminishes its effectiveness in meeting global climate objectives. Moreover, the absence of host-country authorization creates loopholes, potentially allowing for emissions reductions to be counted multiple times, further diluting the value of carbon credits. Furthermore, the CCP certification includes Nature-Based Solutions (NBS) credits, which face several well-documented challenges: Permanence: Forest projects, a common form of NBS, struggle to guarantee long-term climate benefits. For meaningful climate protection, forests need to be preserved for at least 50 to 100 years, but there is currently no mechanism that ensures forest projects will last that long. Uncertain market conditions and the continued need for active forest protection""especially in developing countries""complicate this further.	Step 3: Meet the required carbon credit use and quality thresholds	atmosfair

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Leakage: The issue of leakage remains unresolved. When forest conservation in one area leads to deforestation being displaced to other regions, the overall climate benefit is negated. There is no clear method to accurately measure and mitigate the climate impacts of such displacement. Uncertain CO ,, Offset Market: Forest project operators often require significant upfront investment, leading to the sale of "upfront certificates," where credits are issued for future carbon sequestration by trees that have not yet fully matured. This creates a mismatch between when the credits are sold and when the carbon is sequestered, reducing the reliability of these credits. Given that the VCMI Scope 3 Claim was designed to address challenges companies face in meeting emissions goals, particularly those with approved Science-Based Targets (SBTi), it is essential that the claim pushes for the highest quality carbon credits. These credits should demonstrate clear additionality and secure host-country authorization under Article 6 of the Paris Agreement, ensuring they contribute meaningfully to global climate mitigation efforts. We strongly recommend that, in the long run, the Scope 3 Claim should exclusively consider carbon credits validated under Article 6 of the Paris Agreement. This recommendation is based on three key pillars that ensure the highest levels of integrity and accountability in carbon markets: Transparency: Article 6.2 mandates robust reporting on the use of Internationally Transferred Mitigation Outcomes (ITMOs), ensuring that emissions reductions are transparently tracked and accounted for. Additionally, the Enhanced Transparency Framework (ETF) from Article 13 requires detailed disclosure on how these ITMOs align with Nationally Determined Contributions (NDCs), preventing double counting and ensuring transparent, verifiable climate action. International Oversight and Strong Governance: Article 6.4 establishes a centralized supervisory body that oversees the validation, implementation, and monitoring of projects. This body ensures that all emissions reductions are rigorously verified before credits are issued, guaranteeing that only high-standard, accountable credits are traded globally. Host Country Involvement: Article 6 requires letters of authorization (LoAs) from host countries, confirming their voluntary participation and ensuring that emissions reductions are aligned with national climate strategies and NDCs. This process upholds the sovereignty of the host country and ensures that all projects meaningfully contribute to national and global climate goals. By adopting these Article 6-aligned credits, the Scope 3 Claim would promote transparency, rigorous oversight, and true climate alignment at both the national and international levels.		
· We strongly support the principle that only high integrity carbon credits should be allowed. However, due consideration should be given to ensure CCP-labelling does not act as a barrier to future offtake agreements, which will be necessary for investment to	Step 3: Meet the required carbon	Drax

Comments (compiled)	Section of the Claim	Respondent name/ organisation
be made in capital intensive carbon projects such as BECCS and DACCS i.e. if projects cannot achieve ex-ante CCP approval then it will reduce appetite of buyers to engage in future offtakes. Due consideration should also be given to credits certified in accordance with the EU Carbon Removals Framework, as and when methodologies are finalised and implemented, or at least leave the door open to wider initiatives or regulations that will drive an improvement in quality in the market	credit use and quality thresholds	
1. In the absence of universal criteria enforcing the high-quality label of carbon credits, we should not be arbitrarily enforcing rules around the purchase of credits related to location or sector. Limiting purchase options may limit market participation. There is no need to prescribe action in this way. ICVCM is not the only option. Other recognized iniciatives shall in included. 1. The selection of high-quality carbon credits retired to make the claim should come from recognized crediting mechanisms.	Step 3: Meet the required carbon credit use and quality thresholds	IETA
See general comment above. See general comment above. No changes suggested	Step 3: Meet the required carbon credit use and quality thresholds	Center for Climate and Energy Solutions
2. Companies may chose the high quality credits they want to abate their scope 3 emissions, provided they come from recognized crediting mechanisms, such as ICVCM, CCP, ICROA, CORSIA and programs recognized by governmental initiatives. 3. Other environmental certificate should be allowed to balance scope 3 (cat 11 emission of product use): CO2 storage certificates. This would recognize the environmental benefit and incentivize companies to invest is CCS as a service. 2. Companies may chose the high quality credits they want to abate their scope 3 emissions, provided they come from recognized crediting mechanisms, such as ICVCM, CCP, ICROA, CORSIA and programs recognized by governmental initiatives. 3. Other environmental certificate are allowed to balance scope 3 emissions	Step 3: Meet the required carbon credit use and quality thresholds	Carbonplace
The requirement on Step 3 “Retire only CCP-approved credits”: clearly indicate that the suggestion to conduct a due diligence is really only temporary (as requiring the buyers to carry out that level of due diligence would make IC VCM work irrelevant).	Step 3: Meet the required carbon credit use and quality thresholds	WBCSD - The NCS Alliance
CORSIA eligible criteria are the benchmark for ICVCM's program of "continuous improvement" not because the criteria are scientifically robust, but because they are the result of an intergovernmental agreement and thus are legally sheltered from litigation in the event that the CORSIA eligible credits are issued for sale and subsequently found to be based on fraudulent emissions offset projects, or projects that misrepresent their emissions reductions.	Step 3: Meet the required carbon credit use and quality thresholds	Institute for Agriculture and Trade Policy

Comments (compiled)	Section of the Claim	Respondent name/ organisation
IATP recommends that VCMI delete the option of using CORSIA eligible credits. Furthermore, as Carbon Plan demonstrated in a July 2024 article (https://carbonplan.org/research/icvcm-landfill-additionality), even credits that have been labeled as fulfilling CCP requirements from crediting programs that have satisfied the ICVCM Assessment Framework and Assessment Procedure requirements can fail to provide credit buyers assurance of fullfillment of all CCPs, e.g., regarding additionality. VCMI should recommend that credit buyers conduct their own due diligence for specific types in addition to the ICVCM general due diligence process Folloiwng "approved credits" within the near term target boundary. Delete the option to use CORSIA eligible credits. "VCMI recommends that credit buyers conduct due diligence into the credit types they are consideing to purchase, in addition to aligning their general due diligence process for credit purchase with the general ICVCM CCP due diligence framework.		

15 Incentives

Comments (compiled)	Section of the Claim	Respondent name/ organisation
I think, with a large part of this work being focussed around supporting companies to get started, I would like to see a carbon fee applied to all annual emissions for companies. that fee could also increase as you raise through the claims. then that fee can be spent on credits for unabated emissions, but also other needed investments to solve challenges in abating value chain emissions. this then clearly supports the right incentives, and vcmi could either suggest how to interact with a wider tool set than carbon markets, or stipulate how much of the unabated emissions could be utilised on credits. in this claims case - 24%	General	Anonymous
However we feel at present that there is no compelling business case for companies to make the claim and that take-up will therefore be small. VCMI does not have sufficient brand equity that companies will see making a claim as a positive and credits will still not 'count towards corporate net zero targets. We recommend that VCMI works directly with SBTi to have the approach laid out in this claim mandated in the Corporate Net Zero Standard as a obligation for companies who are missing their scope 3 emissions targets. We believe that this approach has the potential to drive action and accelerate action towards global net zero. No further comments	General	Philip Brady
There is no incentive for corporates to act unless credits can count towards achievement of science-aligned net zero delivery. Limiting the use and application of carbon credits prevents the scaling of high integrity carbon projects by minimising investment and the internal decarbonization of the organization.	General	RWEST
The approach shall address how credits can be counted towards climate targets (the use case), as this is the priority and less so the claim. The approach needs to provide an incentive for companies to take action, being inclusive for all regions, sectors and scales. There is no strong incentive for corporates to act unless credits can count toward achievement of science-aligned net-zero delivery. Only 2 companies have made a VCMI claim to date. What will motivate more companies to use the claims code and S3 claim? VCMI needs to have impact at scale and not become impractical guidance and standards.	General	RWEST
There are other critical points in this discussion on reducing Scope 3 emissions: 2) As currently outlined, the initiative does not identify incentives for reducing a companys own or controlled emissions or for improving its energy efficiency (Scopes 1 and 2). On the contrary, the initiative imposes a double burden for reducing emissions that the company does not manage (i.e., investments to reduce Scope 3 emissions + purchasing credits to offset the Scope 3 gap). This seems to create barriers to investing in emission reductions in processes directly managed by companies (Scopes 1 and 2).	General	Carbonext
Related to this comment on the applicability of the Scope 3 guidance, VCMI should aim to be the practical framework for the companies who want to take action but need more flexibility to use environmental attributes such as carbon credits in parallel to their own value chain emission reductions. VCMI does not need to fit into the SBTI framework but should strive to be an alternative.	General	Anew Climate

Comments (compiled)	Section of the Claim	Respondent name/ organisation
There is no incentive for the company to buy more than the gap amount, since covering a higher share of remaining emissions doesn't currently enable making a higher-tier claim (similar to Carbon Integrity Claims).	General	Perspectives Climate Research
The service of developing a method on when companies are/are not on track, and on a year on year basis, could be helpful, and a remedy framework to address missed targets is needed. Nonetheless, we have reservations about how many companies will actually sign up for this claim - also given the present critic and the past history of greenwashing accusation related to offsetting/compensation claims & approaches.	Step 2: Meet the Scope 3 Claim requirements	WWF

16 Internal decarbonisation

Comments (compiled)	Section of the Claim	Respondent name/ organisation
the text doesn't provide much guidance on how companies can prioritize internal reductions in a way that's scalable and impactful. More guidance on specific strategies or tools to overcome Scope 3 barriers would be beneficial	General	Hatem Ali
The steps for making a claim are clear and easy to understand. It seems to us that the claim is intended to give companies recognition for their investments, presumably based on the assumption that such recognition is lacking today. The purpose of the mechanism, from companies' perspective, should be stated more clearly ie what they get out of it. "Ensuring" the mitigation hierarchy is key to the credibility of this claim. It's very helpful that this claim introduces to the wider accountability ecosystem a requirement that individual companies acknowledge the gap between their current scope 3 emissions and the levels required to be on track towards their near-term goals. But we see a risk that the claim detracts and distracts from efforts to overcome those challenges ie that it doesn't ensure the mitigation hierarchy. If the claim is introduced and companies start using it then it seems likely that money will be channelled towards high quality climate projects, outside companies' value chains. But the claim may well have other, less desirable, consequences, specifically with regard to companies' choices about what other activities to finance. We don't find a convincing theory of change in the document to underpin these statements that the claim is "built on the mitigation hierarchy... to ensure value chain decarbonisation is prioritised" and that it "does not imply the substitution of emissions reductions by the retirement of carbon credits".	General	Claire Wigg
we recommend that VCMI clarify with more detail how companies can and should "invest to overcome existing barriers" to decarbonization. We suggest that VCMI require specific investment actions for companies to undertake, beginning with the adoption of an internal carbon fee that is publicly disclosed. For most companies, this fee should be set at a minimum of $100 per ton CO2-equivalent (a low estimate of the social cost of carbon) to incentivize direct emissions reductions throughout a company's supply chain. In this money-per-tonne approach (which is broadly recommended), this internal carbon fee is multiplied by their unabated value chain emissions in tCO2 e units, per year, by this price per tonne, with the money allocated to climate contribution efforts. However, the small percentage of heavy-emitting companies (utilities, air travel, cement, etc.) that comprise the majority of emissions but generate profits of less than $100/tCO2 of emissions should contribute 10% of their emissions at a price of $100/tonne CO2, using a money-per-money method. In addition, VCMI could require that heavily emitting companies (such as utilities, air travel, and cement) contribute 10% of their emissions at a price of $100/tonne using a money-per-money method (as these companies typically generate profits of less than $100/tonne) (CarbonGap, 2022). Such funds could be spent on activities that have a real potential of yielding significant progress to decarbonization, such as pioneering energy-efficiency technologies and funding research and development into improved battery storage technologies or low-carbon manufacturing, and investment into sectors where finance is in short supply. We also suggest that VCMI encourages or requires	General	Libby Blanchard

Comments (compiled)	Section of the Claim	Respondent name/ organisation
companies to invest where they have influence, as real mitigation outcomes are more likely to occur when companies focus on where they do have influence up and down their supply chains.		
Demonstrate progress towards meeting their near-term scope 1 and scope 2 emission reduction targets - -	Step 2: Meet the Scope 3 Claim requirements	Marine Klobut
The steps in this four-step diagram are generally laid out clearly. Notably, Step 2 includes the criteria that companies must be making progress towards their near-term Scope 1 and 2 targets so that they can use the Scope 3 flexibility mechanism. While we believe the mitigation hierarchy must be respected, and that companies that are on track for Scope 1 and 2 should be recognized for that, we also strongly encourage VCMI to consider how the flexibility mechanism and high-quality carbon credits could also be applied for companies who may be off track on their Scope 1 and/or 2 emissions as well. Public disclosure of the actions taken to address emission reduction barriers enhances accountability and transparency and further helps with accusations of greenwashing. - Suggest guidance on how to implement the two calculation approaches for establishing a company's permitted emissions gap - Suggest providing guidance on how to measure and verify progress towards meeting a company's near-term scope 1 and 2 emission reduction targets	Step 2: Meet the Scope 3 Claim requirements	Anew Climate
It should be made clear that the purchase of carbon credits supported by the claim should not be a substitute for emission reductions. Any guidance provided by the VCMI should clearly reject taking another step back into the offsetting paradigm and the compensatory use of carbon credits.	General	WWF
The compensatory use of carbon credits and its associated claim for missed tragets (albeit action in lieu of missed tragets) may be a reputational incentive for companies give less priority to pushing in value chain investments and emissions reductions.	Step 3: Meet the required carbon credit use and quality thresholds	WWF

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Under the current claim process, there are insufficient incentives in place to ensure that companies would have addressed scope 3 barriers entirely. Furthermore, policy dependencies and technological breakthroughs may limit companies' abilities to meet their goals in the designated timeframe. Our view is that the timeframe is less of a concern but rather that a company has demonstrated maximum efforts in unlocking decarbonisation levers prior to making an offset claim. If the goal is to remove the need for offsets, the claims process needs to be rigorous in ensuring it unlocks decarbonisation barriers along the way. To ensure progress, targets should be tied to remuneration, with companies required to show measurable decarbonization efforts before considering offsets.	Step 2: Meet the Scope 3 Claim requirements	Accela Research
To ensure a company is making efforts, we would suggest the claim is allowable after a 5 year period, following prioritisation of emission reduction activities. This would need to be linked renumeration to ensure all that is possible has been executed.	Step 2: Meet the Scope 3 Claim requirements	Internal decarbonisation
To demonstrate progress, the framework could be more effective if claims were allowed only after a company creates and implements a scope 3 decarbonization strategy. A company would begin with a 5-year decarbonisation plan targeting the most significant emission sources. As they progress, they would identify barriers and the changes needed to overcome them. After this 5-year period, they could make a Scope 3 claim, provided their next plan seeks to address these barriers.	Step 2: Meet the Scope 3 Claim requirements	Internal decarbonisation

17 Monitoring, reporting and assurance

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Would recommend changing to MRV. I haven't looked at this properly so, apologies, I don't have any proper feedback other than my comments about asking for info about their target in the feedback on step 1.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Scarlett Benson
Feedback on Section 3 - Four-Step Process We agree with the steps outlined above, however, we wish to comment on Step 4. We support financial investment in corporate decarbonisation measures for scope 3, irrespective of the credits' limit use for the claim or the emissions gap found. We further propose that credits should not be purchased if impeding on investment in reduction measures within the value chain, including scope 3.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Anonymous
There's no mention of third-party verification. Given the complexities involved in carbon accounting, companies should be required to submit their claims to independent audits to ensure the integrity of the data and the credits used.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Hatem Ali
The 24% threshold seems reasonable. But we have the following questions about the guardrail "the scope 3 emissions gap must decline over time": 1. Isthere a sufficiency threshold, for the gap reducing over time? Ie is a 0.1% reduction in the emissions gap per year sufficient? 2. Will thegap be checked annually, in which case companies may be able to use the proposed claim one year, but not the next? 3. How will this guardrail be enforced in cases where companies have poor quality data in early years and higher quality data in later years? (in which case reported emissions might rise, but for "good" reason) 4. How will this guardrail be enforced in cases where scope 3 targets are up-dated, which is starting to happen for leading companies, and which will affect trajectories? This could lead to an enforced year's pause for those companies in using the claim and/or uncertainty about whether the fulfil the guardrail (especially if targets are changed to be less ambitious).	Step 3: Meet the required carbon credit use and quality thresholds	Claire Wigg

Comments (compiled)	Section of the Claim	Respondent name/ organisation
5. Whatabout companies coming in and out of eligibility to use the claim? Can they start using it again after one or more years of not using it? Similar questions remain about the requirement "companies progressively reduce their own value chain emissions," for clarity eg 1. Will this requirement be checked on an annual basis? 2. Will the check be against a disclosed trajectory? 3. Is this requirement about total value chain emissions, or just those emissions within target boundaries?		
We disagree with the idea that companies should carry out the same level of due diligence as carried out by the ICVCM - this is another barrier to entry. Only a few companies in the world can commit to this level credit assessment and it would make the work of the ICVCM redundant. We want all companies, large and small, to be able to buy carbon credits and make claims. The whole point of the ICVCMs assessment process is that the standards and methodologies have been assessed and those that have the CCP label are deemed fit for purpose. Another level of verification should not be required, especially one that is unlikely to be as thorough as that carried out by ICVCM.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Philip Brady
We also do not believe in the use of external agencies to rate credits ex-post. Again, this is the point of assessing the standards to make sure that their crediting process is effective and that an issued credit represents a tonne. Companies can use ratings in their own due diligence but this should not be a requirement within this claim.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Philip Brady
We commend the attempts, in the foundational criteria, to find ways for companies to demonstrate that they are indeed prioritising decarbonisation, even when investing in carbon credits as well. The requirement to "demonstrate that they are making progress on financial allocation, governance, and strategy towards meeting a near-term emission reduction target;"□ is key . We note that the MRV document puts most of the weight on allocation of finance (to GHG mitigation, across the value chain) for proving this point and we think this could be problematic. According to companies weve spoken with, its not possible to disentangle "ghg mitigation"□ finance clearly from other finance. And companies climate transitions should be embedded in their business strategies, so it shouldnt be possible to disentangle finance for ghg mitigation from finance for regular business investments. Therefore we see a risk that a commendable attempt to assess companies commitment and action to reduce emissions would give misleading results. However we don't, unfortunately, have any alternatives to suggest.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Claire Wigg
In current carbon crediting programs, all actors are incentivized to maximize credits, which may contribute to persistent over-crediting of NbCS projects. In contrast, independence should be integrated into the climate auditing process. Quantification	Step 4: Obtain third-party assurance following the	Libby Blanchard

Comments (compiled)	Section of the Claim	Respondent name/ organisation
methods should be assessed by independent analysts without conflicts of interest, such as by scientists without stakes in carbon credit markets. Auditors should be hired by program administrators or separate independent parties instead of directly by project developers. Third, the location and nature of carbon crediting projects, as well as the necessary information that an external analyst would need to recalculate the benefits and understand the source of the data and assumptions should be publicly available, as is now required for carbon credits under Californias law, AB 1305.	VCMI monitoring, reporting & assurance (MRA) framework	
Step 2 must include and independent audit of Scopes 1 and 2. Insert new bullet, after first bullet in box 2: Obtain third party reasonable level of assurance for Scope 1 and 2.	The four steps to making a scope 3 claim	Sopra Steria Group
Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework We understand that the 'third-party assurance' process should involve both carbon quantification and matters related to budget allocation and other quantifications tied to corporate management. In this context, are there already defined audit protocols for conducting this 'third-party assurance'? Who will be responsible for verifying the quality of these audits for 'third-party assurance'?	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Carbonext
VCMI should also update its MRA framework to ensure that companies correctly implement the claim's requirements and guardrails. NA	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	The Nature Conservancy
From my point of view, this text is very superficial. It does not address the need to improve the issue of lack of trust in Nature-Based Climate Solutions (NbCS) projects, nor does it promote the possibility of somehow guaranteeing the quality of the carbon credit that will be used in this type of complementary action. The text presents some limits, but it is insufficient in terms of guidance to promote a safer way of following the rules. "For the mitigation hierarchy to be guaranteed, the measures implemented and the emissions reductions achieved to date will need to be disclosed transparently, along with a list of existing barriers, an action plan to address them with a timeline for implementation and a report on the indicators of progress achieved, as companies make claims on an annual basis." The proposal is as follows: In order for the mitigation hierarchy to be guaranteed , the national metrology institution at the location of the project that generates the carbon credits needs to endorse the calculation made by the company, the measures implemented and the emission reductions achieved to date will need to be disclosed in a transparent manner, along with a list of existing barriers, an action plan to address them with an implementation schedule and a report on indicators of progress made as companies make claims on an annual basis." This involvement of the national metrology institution brings endorsement to the carbon credit, and dispels the situation of the	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Associação Nacional dos Diplomados do Prominp - ANDP

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Compliance Market and gives the opportunity to improve the control mechanisms of the generation of credits by a national institution.		
We suggest that the MRA Framework be updated to include sufficient detail in the requirements for the Scope 3 Claim. The requirements regarding public disclosure of barriers to Scope 3 emission reductions, as well as actions taken to remove these barriers, should be clearly defined to ensure that companies understand what is required in their submissions and that auditors can effectively evaluate these submissions.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	MSCI
The emphasis on third-party assurance is vital for building trust among stakeholders. Independent verification adds credibility to claims, reassuring investors, consumers, and regulators about the authenticity of reported emissions reductions. We support independent assurance and public disclosure. Overall, the MRA framework appears to be a robust approach to ensuring the integrity of VCMI claims. Continued refinement based on stakeholder feedback and regulatory changes will also be important. Ultimately, the text on steps should not speak to ongoing refinement. Suggest clear references to relevant documents and moving non-guidance to a box or footnote.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Anew Climate
The emphasis on third-party assurance is vital for building trust among stakeholders. Independent verification adds credibility to claims, reassuring investors, consumers, and regulators about the authenticity of reported emissions reductions. We support independent assurance and public disclosure. Overall, the MRA framework appears to be a robust approach to ensuring the integrity of VCMI claims. Continued refinement based on stakeholder feedback and regulatory changes will also be important.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Rubicon Carbon
VCMI should update its MRA framework to include the requirements for its Scope 3 methodology.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	The Nature Conservancy

Comments (compiled)	Section of the Claim	Respondent name/ organisation
In principle, we are very supportive of the idea of rigorous third-party assurance (who are themselves subject to criminal liability for wrongdoing, as in capital markets). The MRA framework is well-intentioned, but applying it to a Scope 3 methodology is meaningless. Fix the measurement and then draw upon well-developed expertise in auditing to build sound audit standards. We once again refer you to our arguments above and to the proto-standard we discussed earlier (https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4957358). We recommend that the document be wholly revised based on our earlier comments.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	E-liability Institute
Third party assurance is an important part of trust and transparency across stakeholders, and the proposed increase in requirements over time is reasonable and allows organisations to prepare without undue burden. VCMI should continue consultation with assurance providers as requirements are developed over time to ensure alignment with best practice and regulation, as well as to identify any potential challenges and blockers for companies seeking assurance, such as cost and complexity of subject matter.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Climate Impact Partners
Agree with approach. None.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Sopra Steria Group
The emphasis on third-party assurance is vital for building trust among stakeholders. Independent verification adds credibility to claims, reassuring investors, consumers, and regulators about the authenticity of reported emissions reductions. We support independent assurance and public disclosure. Overall, the MRA framework appears to be a robust approach to ensuring the integrity of VCMI claims. Continued refinement based on stakeholder feedback and regulatory changes will also be important. Ultimately, the text on steps should not speak to ongoing refinement.Suggest clear references to relevant documents and moving non-guidance to a box or footnote.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	IETA
As noted previously, MRA should be added in subsequent years to promote early adoption of the claim which will provide the required increase in corporate disclosure.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Carbonplace

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The MRA Framework serves a valuable function and must not be compromised by actors with direct financial interests.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Carbon Market Watch
Efforts that bring integrity and rigor to the VCMI Claims code should be supported. Highlighting independent assurance requirements and public disclosure rules adds an additional layer of accountability among companies involved in the setting of scope 3 goals. See above	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Center for Climate and Energy Solutions
The most effective assurance to promote the reduction of Scope 3 absolute emissions over the period of the net zero commitment is in the Foundational Criteria (Step 1) of the Scope 3 Claim calculation process, since if a company's GHG emissions inventory is unaudited and erroneous, subsequent calculations will be skewed and the cliam Scope 3 absolute emissions reduction likely will be erroneous. We have recommended a limited assurance audit of a companies Scope 3 absolute emissions during a three phase-in perido of the Scope 3 Claim and a reasonable assurance audit thereafter for annual estimated emissions reporting. To incentivize accurate and comprehensive emisisons reporting, VCMI should advocate to regulators for a safe harbour from litigation, provided that the emissions audting and reporting are done in good faith. As a second sentence, VCMI urges companies applying to use the Scope 3 Claim to have their annual GHG emissions report audited by a qualified independent third party attesting to limited audit assurance duing the first three years of Claim use and reasonable assurance thereafter.	Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework	Institute for Agriculture and Trade Policy

18 Option box 2 – Emission sources not included within the target boundary

Comments (compiled)	Respondent name/ organization
The risk that the proposed Scope 3 claim, derived from MPP data for 200 companies (excluding the highest emitting 25 companies) with hard to abate emissions, might reduce the climate ambition of science based target committed companies will be reduced if this option is adopted. IATP believes that direct financial contributions for projects to reduce emissions in the communities where corporates have subsidiaries, affiliates or subcontractors is the most effective form of corporate climate action. However, if corporates are to use high quality carbon credits for Beyond Value Chain Mitigation, they should be sourced from emissions reduction projects located in or adjacent to their subsidiary and/or subcontracted operations. replace "alternatively" with "preferrably"	Institute for Agriculture and Trade Policy
Restricting the use of carbon credits to compensate for Scope 3 emissions outside a company's target risks alienating corporate leadership in decarbonisation. In the absence of wider adoption of regulated compliance markets, such as emissions trading schemes that cover a country's economic activity or corporate reporting requirements, voluntary private sector action is imperative to keep the global economy within striking distance of net-zero targets set to avoid the worst impacts of climate change. Without being able to make some claim about progress toward emissions targets, companies - particularly those already questioning their ability to meet targets given the resources to hand - are unlikely to expend additional resources on carbon credits, most of which are unrelated to the immediate emissions footprint of their supply chain. Many companies have already abandoned science-based consensus standards in decarbonisation due to difficulties in meeting targets. Not all companies have the revenue/emissions ratios of the largest tech firms, meaning implementation resources vary widely. Standards setting bodies need to identify ways to keep corporates engaged while not ceding the integrity of decarbonisation approaches. VCMI's Scope 3 Claim program strikes the right balance between setting conditions and guardrails to ensure environmental impact and providing participants the flexibility to stay in the framework and continue to take climate action, particularly in the earlier phases of their decarbonisation pathways.	Anonymous
Feedback on Box 2: Option to be considered We disagree with this approach. The proposed course of action would shift the focus of the claim to its application to BVCM, which we would argue is not the scope of the scope 3 flexibility claim. If actioned as above, considering a scope outside of the target boundary could provide an incentive for corporates to purposefully select emissions sources within and outside of the target boundary, and thus leave out the emissions sources least controlled by them. This claim should cover all unabated emissions instead.	Anonymous
Restricting carbon credits to only cover emissions outside of scope 3 targets would limit a useful tool for companies working toward their climate goals. While reducing emissions within a company's boundaries should come first, carbon credits are essential for dealing with emissions that are hard to cut right now. Instead of placing strict limits on how they're used, the emphasis should be on ensuring companies invest in high-quality, verifiable carbon credits as part of a balanced strategy to manage and reduce overall emissions.	Anonymous

We do not recommend the option presented in Box 2. We believe this use case would not be compelling to companies, as we think they would prefer to prioritise action on the Scope 3 emissions within their target boundary, to support progress towards targets. We think the highest-integrity, and most compelling, actions are, in descending order: 1) meeting Scope 3 targets; 2) making up for shortfall with carbon credits (as described currently in the Scope 3 claim); 3) the option in Box 2. No additional comments to the above	Philip Brady
Scope 3 targets should represent emission reductions within the value chain, not beyond it. We see a major risk of decredibilization of corporate climate claims should offsetting be allowed to reach scope 3 targets: in a context where actors such as ICVCM and VCMI are working to restore confidence form stakeholders, the scope 3 flexibility claim could be a major blow to building integrity in the VCM. Discussions around the perimeter of scope 3 targets and the possible complementary role of alignment targets, as raised by SBTi in its scope 3 paper, seem necessary to tackle the issues around scope 3 target setting. These discussions should incorporate the need for short-term incentivization of investment in the VCM. EDF does not believe incentive for investment in carbon credits should be specifically associated to emissions outside the target boundary. Rather, companies which have targets covering 100% of their scope 3, such as EDF, should be able to leverage investment in carbon credits via recognized claims. Incentive for investment in VCM should apply to all companies. EDF reiterates that, while it believes investment beyond value chain should be incentivized, carbon credits should not be used as offsets to reach short term scope 3 emission reduction targets. This would be contrary to the very definition of value chain targets, contrary to scientific consensus and sectoral decarbonisation pathways, could lead to lock-in effects and encourage the purchase of low-quality carbon credits, among other negative consequences. EDF welcomes discussions around the development of an alternative framework for the use of carbon credits. In this regard, the four steps provide a useful summary of the necessary transparency needed when disclosing the use of carbon credits, in a similar way to requirements set out in the CSRD. Informing stakeholders of progress and barriers to achieving scope 3 short term targets is essential, especially in a context where scope 3 perimeter is subject to debate, with a view to taking into account the relevance of emission categories and the influence companies have over those emissions.	Aindrias Lefévère
You'd need to make it very clear how this compares to Platinum, Gold and Silver claims. If a company only covers 67% of their scope 3 emissions in their target boundary then they'd be purchasing 33% ton-for-ton, which is more than the minimum amount required for the silver claim. This gets a bit confusing. It's also worth noting that SBTi in its scope 3 discussion paper considered expanding the minimum scope 3 boundary to 90%.	Scarlett Benson
What does it mean concretely? Carbon credits being used not in GHG inventory? Then how is it relevant to a Scope 3 rule if it's not used in Scope 3? Explain better what is meant here and how it is relevant in this context. Explain better what is meant here and how it is relevant in this context.	Marine Klobut

A more integrated approach""where companies can use carbon credits both within and outside their scope 3 boundaries""would allow for greater flexibility, faster action, and better alignment between offsets and actual emissions.	Anonymous
[strongly agree with box 2] This would ensure that use of carbon credits increases corporate climate finance and mitigation outcomes as it is over and above their existing commitments.	Scarlett Benson
In Step 3, the option outlined in Box 2 should be presented as part of the process. Consider using the option outlined in Box 2 for Beyond Value Chain Mitigation of Scope 3 emissions	Institute for Agriculture and Trade Policy
This would be far more confusing, when clarity is what is needed from any new claims. For example, how would a company concisely communicate this scenario to stakeholders and civil society who are not familiar with target boundaries? The proposed gap is far clearer.	Anonymous
Companies should also take responsibility for unabated emissions within the target boundary. No comment	Tradewater LLC
The option to be considered seems to be targeting action that falls outside of Scope 3 and is confusing. To ensure carbon emissions reduction is achieved one needs to be clear. Have clear targets and boundaries for which the targets operate in. If I have miss understood what the text means then the text would benefit from further clarification and/or expansion of what the option includes.	AHDB
We think carbon credits should be available to support various claims, including contribution and compensation claims. The whole point of the Scope 3 flexibility claim is to help accelerate near term action on net zero. Restricting use to emissions outside of scope 3 targets would negate that goal. We believe high quality carbon credits should be acceptable to compensate for all unabated Scope 3 emissions within the target, as well as unabated Scope 1 and 2 emissions, as long as the mitigation hierarchy is respected. We support carbon credit use for closing the gap.	Rubicon Carbon
[disagree with box 2] SBTi's current Corporate Net Zero Standard allows exclusion of up to 33% of scope 3 emissions from a scope 3 near-term target, "acknowledging the challenges that companies encounter with scope 3"□. In the light of these challenges, and recognising that companies have varying degree of control over their scope 3 emissions, we consider that it would be more meaningful to start with a focus on those scope 3 emissions that companies have control over, rather than seeking to expand the coverage of scope 3 emissions to 100%. A post by Michael Gillenwater explains why seeking 100% coverage of scope 3 emissions is not necessarily meaningful.	Perspectives Climate Research
Carbon credit use should not be restricted to emissions outside the target boundary. Allowing the use of carbon credits towards Scope 3 claims can provide real, verified and additional progress towards climate targets and complement internal decarbonisation efforts. Acknowledging the variance in credit quality and advocating for a risk-based portfolio approach in both Scope 3 claims and beyond target emissions could further incentivise emission reductions.	BeZero Carbon
[Disagree]. Limiting the use and application of carbon credits prevents the scaling of high-integrity carbon projects by minimizing investment. None	Invert

[Strongly disagree with box 2] Section 2.3 of the SBTi Net Zero standard already requires companies to neutralize emissions not accounted for in SBTs and GHG inventories. If VCMI changed its Scope 3 Framework objective to now address emissions not included in targets, it would not be fully additional. VCMI also indicated that its Scope 3 Framework is designed to incentivize climate action while recognizing that companies face challenges in meeting their Scope 3 targets. If VCMI changed its Scope 3 Framework objective to now address emissions not included in targets, it would not help companies in getting back on track with their Scope 3 climate targets. NA NA	The Nature Conservancy
[Disagree with box 2]. Companies need flexibility to achieve their targets and restricting where credits should come will further inhibit much needed action. We support the use of the mitigation hierarchy to address emissions across all scopes and to make up the shortfall companies should focus on sourcing high integrity carbon credits that have additional co-benefits. Companies need flexibility to achieve their targets and restricting where credits should come will further inhibit much needed action. We support the use of the mitigation hierarchy to address emissions across all scopes and to make up the shortfall companies should focus on sourcing high integrity carbon credits that have additional co-benefits.	Bayer Crop Science
If this is regarding the Scope 3 Claim then the focus should remain on scope 3 emissions otherwise it becomes unclear and will hindering progress.	AHDB
Is VCMI effectively proposing an alternative aligned with SBTI's BVCM here, instead of allowing carbon credits to address a company's actual emissions? This is not clear but seems to be implied. If that is the intent, it should be made more clear. However, we do not support this approach. Rather, we believe high quality carbon credits should be acceptable to compensate for all unabated Scope 3 emissions within the target, as well as unabated Scope 1 and 2 emissions, as long as the mitigation hierarchy is respected. We support carbon credit use for closing the gap. Explicitly state if Box 2 proposal is meant to be BVCM and directly aligned with SBTI. If it is, we respectfully request VCMI to reconsider its approach and allow it to be used for compensating for Scope 3 emissions. Currently the text is very unclear.	Anew Climate
The idea of establishing target boundaries for carbon credits at the entity level represents an impractical approach akin to central planning. It requires a level of omniscience from VCMI staff that is not feasible. The only meaningful target in the context of climate action is geological net zero. Public policy should not attempt to dictate individual target boundaries for each entity within the economy, as doing so would mirror the failed Soviet-style planning approach, where centralized profit targets stifled economic dynamism and innovation. Each organization operates within unique contexts, making it implausible for any single governing body to effectively determine and enforce specific targets across diverse sectors and entities. Arguments supporting this perspective can be found in Karthik Ramanna's work, "We Can't Fix Climate Change; But We Can Create a System That Will," which underscores the need for a decarbonization system that allows for corporate innovation, flexibility, and accountability rather than prescriptive top-down measures that are likely performative and cannot be achieved in practice (http://dx.doi.org/10.2139/ssrn.4853453). VCMI, given the use of "voluntary" and "market" in its name, should be well-aligned with this approach. As outlined above, what we propose is a fundamentally different approach to carbon measurement that is based on true "accounting" and similar to how capital markets function. This would require VCMI to exercise considerable leadership in reimagining carbon markets as they currently function. We think VCMI is well-resourced to do this, and we stand ready as academics to support this transformation. We recommend that the document be revised on the basis described in our answers above.	E-liability Institute

FincoEnergies™ fundamental feedback on this topic is that we suggest VCMI expands the scope of the VCMI Scope 3 Claim to include both uses considered in Box 2. That is both: 1. Use of credits to take responsibility for within-target boundary emissions gap emissions; 2. Use of credits to take responsibility for the emissions outside of a company's scope 3 emissions target boundary. FincoEnergies supports the goal of providing a mechanism for companies to take responsibility for their trajectory emissions gap while they get back on track with their scope 3 emissions trajectory. However, also of substantial importance is the unabated emissions outside the target boundary. VCMI's Scope 3 Claim framework will be a real stimulus for action for addressing the trajectory gap, but FincoEnergies considers it would be a significant missed opportunity to not likewise stimulate such action towards outside the target boundary emissions. The arguments for the motivation for, and value of, the Scope 3 Claim framework for addressing a company's trajectory emissions gap also similarly apply to their outside the target boundary emissions. Expanding the scope of the Scope 3 Claim as suggested to cover these emissions would enable a trustworthy option for willing companies to take responsibility for them while they in tandem decarbonise their value chain and progressively increase the percentage coverage of their target boundary over time. The integrity boost provided by the expanded Scope 3 Claim mechanism would provide increased confidence for companies to take responsibility for both their trajectory emissions gap and their outside the target boundary emissions - simultaneously increasing the integrity and scale of investment in climate action.	FincoEnergies
We neither agree nor disagree with this statement, as it depends on what happens to the remaining, in-boundary, emissions. We generally are not supportive of tonne-for-tonne approaches. However, if such an approach was adopted, then limiting it to emissions that are outside of the target boundary, while adopting something more stringent for inside the target boundary, could be acceptable. Ultimately, the key element is to ensure stringent targets and a far-reaching boundary. In fact, we do not believe that this question is particularly relevant, because companies should extend their scope 3 target boundaries to as close as possible to 100% of their emissions. In addition, we would like to stress that, based on the latest proposals by the SBTi, which suggest a possible shift away from purely GHG-focused targets, setting parameters based on GHG target boundaries would not be relevant. Separation of carbon credits from GHG emissions and emission reduction targets One advantage of limiting the use of credits to emissions outside the target boundary is that it - at the very least - separates the use of carbon credits from the scope 3 emission reduction target since credits would only be used to address emission sources outside the target boundary. This could resolve - in the short-term - the overarching concern of whether carbon credits will be used to "address" Scope 3 targets. The resulting claim could be less misleading depending on VCMI's wording of the Scope 3 claim itself (currently unknown) which - if this alternative is adopted - should not be labelled a "Scope 3" claim at all. Separating the use of carbon credits from internal emission reduction targets is not a new concept and can be found in, inter alia, the following 'best practice' guidelines or legislation: -UN High-level expert group report on net zero emissions commitments of non-state entities: "Non-state actors must prioritise urgent and deep	Carbon Market Watch

reduction of emissions across their value chain. High integrity carbon credits in voluntary markets should be used for beyond value chain mitigation but cannot be counted toward a non-state actor's interim emissions reductions required by its net zero pathway"□. -SBTi Corporate Net Zero Standard (v 1.2): "Exclude the use of carbon credits: Carbon credits must be reported separately from the GHG inventory and do not count as reductions toward meeting near-term or long-term science-based targets. Carbon credits may only be considered as an option for neutrali[s]ing residual emissions or to finance additional climate mitigation beyond their science-based emission reduction targets"□. -EU's Corporate Sustainability Reporting Directive's (CSRD) Delegated Regulation, the European Sustainability Reporting Standards (ESRS): "AR 63. When preparing the information on carbon credits required under paragraphs 56 (b) and 59, the undertaking shall:[â...] (f) not disclose carbon credits as a means to reach the GHG emission reduction targets disclosed under Disclosure Requirement E1-4"□ (e) not disclose carbon credits as an offset for its GHG emissions under Disclosure Requirement E1-6 on GHG emissions"□. -OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: "Carbon credits or offsets should be of high environmental integrity and should not draw attention away from the need to reduce emissions and should not contribute to locking-in greenhouse gas intensive processes and infrastructures. Enterprises should report publicly on their reliance on, and relevant characteristics of, any carbon credits or offsets. Such reporting should be distinct from and complementary to reporting on emissions reduction"□. Target boundary must extend as far as possible Whether or not the above alternative will lead to high(er) integrity claims is also dependent, however, on the percentage of scope 3 emissions that a company must cover in its target boundary. Using carbon credits to cover areas outside the target boundary is, as previously explained, less misleading because of the separation of credits and emission targets. However, a company must aim to cover at least 90% of its scope 3 emissions. This would increase transparency - and overall integrity - by ensuring that the target boundary extends as far as possible. Setting restricted target boundaries can be misleading for a couple of reasons. If a company chooses to cover only 67% in their scope 3 target boundary, for example, it could be excluding sizable emission sources that are critical for the transition. If this company then makes a Scope 3 Claim, credibility will plummet. No general comment.	
This is good for the reason that where a company does set a boundary in line with the SBTi, it minimizes the use of offsets outside the value chain. Where companies set targets not covered by SBTi it may provide an incentive to have scope 3 targets address only a small boundary. It is important there are some criteria on how the boundary is set such that the emission sources included are material. In our work, the Climate Value Chain Framework, we recommend activities which exceed 5% are included within the boundary, in line with SBTi.	Accela Research
Disagree - companies should be encouraged to address emissions within and outside their target boundary. However, if these emissions are material to the company, they should be addressed/included within the core Carbon Integrity Claim, not as a voluntary additional Scope 3 claim. VCMI should reinforce the importance of the mitigation hierarchy at the same time.	Climate Impact Partners

Companies should be encouraged to include all Scope 3 emissions within their target boundaries · We would therefore not recommend use of carbon credits to be only used against Scope 3 emissions outside of the target boundary on the basis this would serve to be most advantageous to those companies whose targets cover a lower % of Scope 3 emissions · Companies should be encouraged to include all Scope 3 emissions within their target boundaries · We would therefore not recommend use of carbon credits to be only used against Scope 3 emissions outside of the target boundary on the basis this would serve to be most advantageous to those companies whose targets cover a lower % of Scope 3 emissions	Drax
[disagree] This option may make companies to take the easier option of excluding difficult to reduce areas from their target boundaries and use carbon offsetting as the chosen solution. Companies should be encouraged to include, ideally all areas within its target boundaries for Scope 3. The use of carbon credits for making a Scope 3 Claim can also be used in addressing emissions that are not accounted for within scope 3 emission reduction targets - those outside the target boundary, conforming to the SBTi standard rules on what maximum percentage can be outside the target boundary.	Sopra Steria Group
Please clarify if this is referring to BVCM. If yes, its worth clarifying in the text. We should open this option as it goes against the principle we try to define with this claim. It might be an additional solution but not an alternative to obtain the claim	BURN manufacturing
We believe that VCMI should emphasize that credits purchased to achieve Scope 3 claim requirements involve emissions outside of Scope 3 reduction boundaries. We encourage VCMI to define and differentiate between "activity aligned"□ and "non-activity aligned"□ environment attribute certificates (EACs) and emphasize that the sourcing of activity-aligned EACs are valid means of achieving Scope 3 reduction targets. Activity-aligned EACs (AKA insets) are generated from interventions to lower the emissions of an underlying activity that contributes to a company's GHG inventory (operational and/or value chain). For example, activity-aligned EACs could include purchasing SAFc credits to address aviation emissions or RECs for electricity sector emissions, and carbon credits can also be activity-aligned EACs when conveying GHG reduction that occurs within a company's value chain and when no other type of instrument is available. Initiatives such as SBTi have recently indicated interest in permitting activity-aligned EACs to contribute to Scope 3 reduction targets. We encourage VCMI to help distinguish when carbon credits represent valid means of reducing company emissions and when they are sourced for other purposes. see above	Netflix
We support the use of carbon credits to supplement internal emissions reduction efforts. Restricting the use could limit their effectiveness in addressing the overall Scope 3 emissions gap. By allowing companies to use carbon credits widely, we can incentivise both more ambitious emissions reduction targets and increased contribution to global emissions reductions.	Carbonplace
We strongly disagree that companies should only be directed to use carbon credits for addressing emissions outside their target boundary. While we believe companies should ALSO be able to show climate leadership by investing in carbon credits to cover emissions outside their target boundary, the priority for VCMI should be the company's targeted emissions. While we believe the mitigation hierarchy should be prioritized, we support the use of high-quality carbon credits to address not only Scope 3 emissions, but Scope 1 and 2 emissions as well.	Anew Climate
The text should be changed to the following: The use of carbon credits should be restricted to addressing emissions that are not accounted for within scope 3 emission reduction targets - those outside the target boundary. The target boundary must extend as far as possible and cover - at least - 90% of scope 3 emissions, and stringent reduction targets should be set on those scope 3 emissions.	Carbon Market Watch

[Strongly disagree with box 2]. High-quality carbon credits shall be allowed to be use to abate Scope 1 and 3 emissions, to provide companies with flexibility and realistic options for action, while respecting the mitigation hierarchy. It has been demonstrated companies that use carbon credits to abate their emissions are also those decarbonizing at a faster pace and implementing more ambitious strategies to mitigate their scope 1 and 2 emissions. Carbon credit allow to integrate carbon strategies at a financial level in companies statements which is essential to be integrated in the company development strategy. Limiting the use and application of carbon credits prevents the scaling of high-integrity carbon projects by minimizing investment and the internal decarbonization of the organization. It might be an additional solution but not an alternative to obtain the claim	BURN manufacturing
This approach would reduce the incentive for companies to make a Claim and subsequently address/reduce their Scope 3 emissions. Companies could potentially do this proposed Option regardless of whether they are on track with their reduction targets. Since these emissions fall outside the target boundary, removing the link to the emissions gap disconnects the Option from the current challenges and barriers companies face. This could weaken the rationale for the Scope 3 Claim as a mechanism for tackling existing Scope 3 issues while generating climate finance through the use of carbon credits. Given that these emissions are outside the target boundary, the Option resembles 'Beyond Value Chain Mitigation' (BVCM). While there may be benefits to allowing companies to validate BVCM claims, this approach does not appear to be fully aligned with the objectives of the Scope 3 Claim. Addressing Scope 3 emissions outside of the target boundary could be considered a separate claims tier or an additional action that companies might take; however, it should not serve as the primary focus of the Scope 3 Claim. This Option could be an additional action, or a separate claims tier (i.e a Scope 3 Claim +)	MSCI
[Strongly disagree] 1. Aligned with IETA Guidelines, high-quality carbon credits shall be allowed to be use to abate Scope 1, 2 and 3 emissions, to provide companies with flexibility and realistic options for action, while respecting the mitigation hierarchy. It has been demonstrated (Ecosystem Marketplace, MSCI, Sylvera reports) that companies that use carbon credits to abate their emissions are also those decarbonizing faster and implementing more ambitious strategies to mitigate their scope 1 and 2 emissions. Limiting the use and application of carbon credits prevents the scaling of high-integrity carbon projects by minimizing investment and the internal decarbonization of the organization. 1. There is no strong incentive for corporates to act unless credits can count toward achievement of science-aligned net-zero interim short and medium term targets. 1. Align with IETA Guidelines for High Integrity Use of Carbon Credits 2. Clarify that credits can count toward achievement of science-aligned net-zero delivery, across all scopes for both interim (short and medium) and long term targets.	IETA
[Agree with box 2] To protect vital natural carbon sinks and support a just energy transition in places beyond company value chains, companies should be encouraged to make additional investments in beyond value chain mitigation that deliver mitigation outcomes or contribute to systems transformations. These investments should not replace or delay corporate value chain decarbonisation.	WWF
If the use of carbon credits are restricted to addressing emissions outside the target boundary, the risks present in the current Scope 3 Claim could be partly mitigated. This caveat would ensure that companies use carbon credits to complement - rather than replace - the essential actions needed to meet their pledged targets. Overall, we advocate for guardrails which prevent companies from using carbon credit purchases to "offset" emissions in their value chain, and are supportive of a "contribution approach" for reporting carbon credit purchases.	Anonymous

We understand that offsets are used for emissions that companies cannot control. For example, if the target boundary is set at 90% as in the case of SBT Net Zero, emissions that companies cannot control may also be included in the target boundary, which would be a discrepancy with the proposal in Box 2. Therefore, if the use of carbon credits is limited to emissions outside the target boundary, certain conditions should be established.	TOKYO GAS CO.,LTD.
We consider that the major risks associated with the VCMIs proposal would be partially mitigated, if the use of carbon credits would be restricted to addressing emissions outside the target boundary. Importantly, this would ensure that companies use carbon credits to complement - rather than replace - the essential actions needed to meet their pledged targets. However, it is unclear what would be the additional value of such a claim to any other claim that the company is making. The terminology of the claim would be important. If it could be interpreted as an offsetting claim, then it could be misleading. If the claim would imply a form of contribution, then it would raise the question why this is any different to the existing set of VCMI's Silver, Gold and Platinum contribution claims. We consider that the major risks associated with the VCMI's proposal would be partially mitigated, if the use of carbon credits would be restricted to addressing emissions outside the target boundary. Importantly, this would ensure that companies use carbon credits to complement - rather than replace - the essential actions needed to meet their pledged targets. However, it is unclear what would be the additional value of such a claim to any other claim that the company is making. The terminology of the claim would be important. If it could be interpreted as an offsetting claim, then it could be misleading. If the claim would imply a form of contribution, then it would raise the question why this is any different to the existing set of VCMI's Silver, Gold and Platinum contribution claims.	NewClimate Institute

If the company in question has defined its carbon footprint correctly then all material Scope 3 emissions should be within the target boundary. If there are material and measurable emissions outside the boundary the company should be told to revise its footprint. VCMI should focus on using credits to meet targets as defined by target-setting standard organizations (i.e., SBTi using GHGP accounting). The Scope 3 Claim has been proposed with the goal of enabling struggling companies to meet their scope 3 target, despite being on track to meet their scope 1 and 2 targets. Allowing companies to make a Scope 3 Claim to address sources outside of their target boundary would contradict the original purpose of the Scope 3 Claim and be confusing since the use of credits would explicitly be addressing Beyond Value Chain Mitigation (even if sized to amount to actual scope 3 emissions). The confusion of a 'scope 3' Claim addressing emissions outside the scope 3 target boundary could substantiate greenwashing concerns. It would be better to set out a beyond value chain mitigation target altogether, when the scope 3 target is missed - which could equate retired credits to the size of the scope 3 footprint if so desired, but would not be called a Scope 3 Claim. Companies should be allowed to contribute to social net zero regardless of their own net zero performance. However, it should be very clearly communicated when the scope 3 target has been missed. The purchase of credits beyond the supply chain to claim progress toward other climate goals (and not a company's net zero trajectory) could find its own separate claim for recognition (e.g. a "beyond value chain claim for when scope (3) is missed,"□ for example). It should indeed be treated as climate action that is separate from net zero claims, when the company is offtrack against net zero trajectory emissions. When decarbonization targets are missed, companies would try obtain recognition for contributing to overall global mitigation by: - Acquiring carbon credits outside of the supply chain and not related to the scope 3 boundary, with no accounting toward own net zero/decarbonization goals (so effectively contributing to other climate goals, a "social net zero"□ contribution) - Acquiring carbon credits outside of the supply chain and related to the scope 3 boundary, or "supply shed"□ emissions, using methodologies in the process of being defined by initiatives such as the AIM Platform. Please see earlier comment in "Scope 3 Claim (b)"□. Please see earlier comment in "Scope 3 Claim (b)"□.	Center for Climate and Energy Solutions

19 Option box 3 – Selection of carbon credits related to the sources of emissions

Comments (compiled)	Respondent name/ organisation
the real goal in all these initiatives is to support companies to mobilise finance to create impact, not one specific tool. I would like to see this mandated, or at least heavily encouraged. the challenge with scope 3 is often proving whether company A is responsible for the impact. by applying a geographic and sector specificity to the credit purchasing, (even if out of inventory boundary) the impacts being generated will still be closer to	Anonymous

Comments (compiled)	Respondent name/ organisation
supporting eventual decarbonisation. for example, a FLAG company sourcing from a region, purchasing credits transforming that region will do more to support potential future vc decarbonisation than if it was purchasing credits completely unrelated location. furthermore, by pushing companies to consider location and sector, they are pushed closer to considering impact in areas impacted by their practices which promotes more incentivises to consider impacts within value chains.	
Feedback on Box 3: Option to be considered We agree with the above on credit selection. Credits should be chosen according to their relation to the buyer preference if aligned with the sources of the scope 3 emissions contained in the emissions gap. General criteria for the selection of credits to address this are, in our view: Project geography, vintage, credit technology, carbon crediting program, credit standards and frameworks as well as co-benefits. We would further obligate the use of high-quality NBS avoidance and removal credits to this effect.	Anonymous
I agree, it would support companies taking responsibility for what is happening on activities / geographies that are related to their own value chain. -	Marine Klobut
Special attention should be given to to risk of double counting, meaning that the carbon projects emission reductions are already accounted in the scope 3 achievements and could be used also to close the gap.	Javier Castro
This all depends really on what VCMI's primary objective is with this claim. Is it to a) to ensure that companies that aren't meeting their scope 3 targets are still contributing to climate mitigation (as opposed to doing nothing) and effectively creating a carbon price to incentivize them to get back on track with scope 3? Or is it b) to channel finance into nature and scale the VCM more generally, or even c) to help them address the systemic barriers so that they can eventually get back on track with scope 3. Linking the carbon credits more closely to the value chain could help address systemic barriers e.g., if an automaker was not able to achieve its scope 3 target in that year because the grid in the country where it sells EVs is not decarbonizing and the company didn't have the ability to go faster on other scope 3 categories to counteract the underperformance on abating this emission source, then it could be valuable for the company to invest in RE carbon credits in that country (assuming they're additional) to accelerate the decarbonization of the grid so they can get back on track in future years. There might also be a case where if a food and beverage companywas not able to achieve it's scope 3 target in that year because e.g., they were not able to eliminate deforestation from their supply chain in e.g., Ghana (and could not make up for the underperformance by going faster on other scope 3 mitigation opportunities) it would be better for them to purchase high-quality REDD+ credits from Ghana to protect a geographically linked area of forest. But they're still deforesting so they shouldn't be able to say they've achieved zero deforestation (because they haven't). And it's questionable about the extent to which purchasing REDD+ credits helps address systemic barriers preventing them from eliminating deforestation from their supply chain. Perhaps if it's a jurisdictional REDD+ credit which truly is incentivizing the government to implement and enforce policies to tackle deforestation across the jurisdiction (but if I'm honest I am skeptical about that too). So I'm not sure about this one. Another potential benefit of this would be that it might limit the risk of climate finance dilution. The risk of climate finance dilution is that the	Scarlett Benson

Comments (compiled)	Respondent name/ organisation
existence of the claim encourages companies to spend less (not bothering with expensive mitigation which requires capex like anaerobic digestion or things that might require R&D like green hydrogen) and instead funding cheaper mitigation opportunities (notwithstanding that many carbon credits today cost less than the true cost of abatement). However, there is a downside in that you limit a companies options to fund mitigation opportunities that are severely underfinanced and in urgent need (e.g., protecting natural ecosystems), or funding CDR scale up. Hence my first point about what is VCMI trying to achieve. Ultimately, and probably unsurprisingly, I think the SBTi's proposal might work better (see scenario 2 in the July scope 3 discussion paper) which is where commodity EACs are used. From the SBTi paper: "There may be scenarios where, on the pathway to net-zero, sourcing commodities aligned with global climate goals remains unfeasible, or whenever higher traceability cannot be established, due to market, regulatory, or physical barriers. In such cases, using certificates from chain of custody models with lower traceability (e.g. unbundled commodity certificates) could potentially be considered as an interim measure with clear guardrails (e.g. time, volume, etc.), limited to high-quality certificates from sources that can demonstrably lead to comparable net-zero aligned outcomes (e.g. level of finance, level of mitigation, etc.) and with claims that are appropriate to the level of traceability."	
The text is clear and presents its ideas logically, making a strong case for the strategic selection of carbon credits related to scope 3 emissions Overall, it's a solid piece that effectively communicates important considerations regarding carbon credit selection.	Anonymous
No. VCMI should stick to the principle that all high-quality credits, which achieve the CCPs (or is CORSIA compliant in advance of ICVCM decision) are equal and fungible. Otherwise this could have implications from market growth/liquidity. We would agree with the principle that credits should closely associated as possible (geography/sector) if the credits were to be included in the companies GHG inventory/count towards scope 3 target. But as they are not in this case then we do not agree with this approach.	Philip Brady
We do not support this option because itwould play towards the narrative that carbon credits are used instead of reductions for meeting scope 3 reduction targets, with possible "netting" in inventories. Even if this claim does not sanction "netting" in inventory reports, we consider it's important to keep a distance from the possibility of it being interpreted in this way.	Claire Wigg
Based on my feedback on box 3 I am not sure about this. I've provided pros and cons. I think on balance I'm probably in favour of it.	Scarlett Benson
See answer above, on Option to be considered (Box 3).	Claire Wigg
We supportthe recommendation to encourage within-sector, or within-geography credit use to drive financing towards hard-to-abate sectors and climate action to geographies where emissions are taking place. However, making this a requirement would make the use of credits highly restrictive. Hence it should be a recommendation/suggestion but not a requirement. Keep it as a recommendation.	Anonymous
This option should be provided as guidance. In our experience, organizations do actively tend to lean towards carbon credits that support location and sector alignment. However, making this a requirement could limit the investment or volume of such purchases if sector and location are cost	Invert

Comments (compiled)	Respondent name/ organisation
prohibitive. Organizations may also opt out of participating entirely if they feel as though their investment decisions are being externally driven. This text should be presented as a recommendation vs a requirement.	
This alternative proposal could potentially mitigate some of the risk that the Scope 3 Claim distracts from and delays action. If carbon credits derive from equivalent activities, it is possible that they may not present a significantly cheaper alternative and a disincentive to direct action. This would also ensure that the specific transition associated with the emission source remains addressed in some way, which would also be beneficial for the company in terms of supporting the emergence and development of technologies that they will later rely on to directly reduce their own emissions footprint. However, this depends on the activities being sectorally and geographically equivalent, rather than sectorally or geographically related, which could still imply the use of carbon credits from various activities and not necessarily one of equivalence to the emissions source. The use of commodity EACs within the supply shed (see NewClimate Institute 2024, forthcoming) might be preferable to the use of carbon credits from sectorally related activities, since commodity EACs could if well defined target the specific technologies and transitions necessary to be aligned with 1.5 °Ccompatible pathways. By comparison, carbon credits could be issued from measures for marginal emission reductions to conventional technologies that are not necessarily supporting the transition to new technologies	NewClimate Institute
This is not a useful recommendation. Climate change is global and it is essential that the selection of high-quality carbon credits remain unconstrained, so that the best opportunities can be invoked and cost-effectiveness is not degraded by arbitrarily-imposed conditions. It will be important, as companies and governments seek to stimulate positive responses to plan for net-zero operations in the long-term, that their competitiveness is not hampered by the imposition non-scientifically-based restrictions to purchasing high-quality carbon credits from wherever they may be generated. Speed, as well as quantity, is a key parameter that must be stimulated to ensure that the cumulative cost of addressing climate change will be an economically acceptable as possible, and at present demand for high-quality carbon credits could outstrip supply unless the market as a whole is accessible. I would propose to extend the narrative contained in the final sentence starting 'On the other hand…', along the following lines, with this being set out as a separate paragraph: Climate change is global and it is essential that the selection of high-quality carbon credits remain unconstrained, so that the best opportunities can be invoked and cost-effectiveness is not degraded by arbitrarily-imposed conditions.Speed, as well as quantity, is a key parameter that must be stimulated to ensure that the cumulative cost of addressing climate change will be an economically acceptable as possible, and at present demand for high-quality carbon credits could outstrip supply unless the market as a whole is accessible.	BionerG Ltd
It is not an easy process to source high quality carbon credits and limiting the purchases either geographically or sectorally could create further barriers and put companies off from making a Claim.	Natwest Group
One need to be careful with sectoral and/or geographical requirements are they can limit opportunity, hinder supply and demand. This is seen with Biodiversity Net Gain credit creation which is fuelled by local demand. As mentioned in the text above, the benefits or such requirements are acknowledged however this could result in farmers not getting fair market value for their efforts. Thus, if wanting to implement, we suggest considering a scaled approached: First, insetting within industry nationally so to align action with national net zero targets.	AHDB

Comments (compiled)	Respondent name/ organisation
If not possible the to claim nationally, outside the sector. Third stage is if there is no opportunity nationally (UK) to look at within sector opportunities in the EU.	
FincoEnergies suggests that VCMI allow for both options in its Scope 3 Claim framework. This would enable customer choice depending on their specific goals and circumstances and better encourage the uptake and scale up of the VCMI Scope 3 Claim framework. Enabling both options would: - Provide an avenue for companies who have a strong desire to target their impact more closely to their value chain via an carbon credit insetting approach. This option also has the potential for endorsement by bodies such as SBTi to be used to reduce a company 's scope 3 inventory emissions (as currently being explored by SBTi in its review of its Corporate Net Zero Standard, as discussed in its July 2024 Discussion Paper). -Also provide an avenue for companies to use carbon credits not associated with their value chain. This option can better align with the goals and circumstances of some companies, and represents a more flexible and likely cost-effective approach. It would also likely greatly support the wider-spread uptake and scale up of the VCMI Scope 3 Claim framework, particularly in this early phase with carbon credit insetting and carbon credits for scope 3 being in a state of relative infancy. Restricting the use of carbon credits to only those sectorally / geographically related to the company 's value chain would place a unnecessary and too great a restriction on users of the Scope 3 Claim framework. The direct climate impact of both options is the same, and it is FincoEnergies ' position that whether that impact is focused more closely on the company 's value chain should be a decision left to the company in reference to its specific circumstance and goals. Such a restriction would also be expected to somewhat stifle the uptake and scale up of the Scope 3 Claim system, which would be missed opportunity.	FincoEnergies
While encouraging companies to choose sectorally and geographically aligned credits may seem like a way to localize responsibility for emissions, the approach of using carbon credits in the first place shifts away the focus from real emission reductions within the value chain. We urge VCMI to reconsider the proposal in this paper, as it risks the reputation and credibility of VCMI and a company that decides to use it.	ECOS
It could be considered as a recommendation but should not be mandatory. Aligning the use of credits to address the 'gap' in Scope 3 emission reductions with the emissions that are currently challenging for the company to reduce has a valuable internal 'logic'. Additionally, there is potential for 'win-win' scenarios where carbon projects implemented can contribute to overcoming the barriers to decarbonization identified by the company. However, this should not be a mandatory requirement, as there may be instances where suitable carbon credits do not exist that are directly related to the sources of emissions within the company's Scope 3 emissions gap. Furthermore, it could contradict the principle that carbon credits should focus on abatement where costs are lowest. If more abatement can be achieved at the same cost in areas unrelated to the Scope 3 challenge, it can be argued that prioritizing these alternative carbon credits would be more effective for achieving rapid global emission reductions.	MSCI

Comments (compiled)	Respondent name/ organisation
Regardless of the geographical or sectoral focus, carbon credits purchased should be generatedfrom activities are aimed at capturing the “high-hanging fruit”. Carbon markets should be used to direct resources to hard-to-abate sectors and emissions sources, rather than capturing only the easiest and cheapest emissions reductions.	WWF
This suggestion will disadvantage projectcommunities who have not given up their land for extractive activities, and who have no link to sectors. We recommend removing this text.	Anonymous
This should be a mandatory requirement for using credits to make claims. By implementing this concept as a requirement companies would need to undertake meaningful analysis on their own supply chain and the composition of the credits they are purchasing. It does not make sense for an oil and gas company to offset their emissions by buying forestry related credits as an example. Similarly with emerging market cookstoves.	TheoryMesh
Strongly disagree with making this a requirement. There is no need to prescribe this action. Companies should be given flexibility to select the high-quality credits they want to abate their scope 3 emissions. Requiring some sort of matching could unnecessarily narrow the pool of available credits, as carbon credits may not be readily available in certain geographies or sectors. It could be cost prohibitive. Delete Box.	Anew Climate
Strongly disagree with making this a requirement. There is no need to prescribe this action. Companies should be given flexibility to select the high-quality credits they want to abate their scope 3 emissions. Requiring some sort of matching could unnecessarily narrow the pool of available credits, as carbon credits may not be readily available in certain geographies or sectors. It could be cost prohibitive. Remove Box 3.	Rubicon Carbon
Directing companies to source sectorally relevant carbon credits could potentially help bolster the credibility of the Scope 3 claim since companies would focus on solutions that they will ultimately need to achieve Scope 3 reductions.	Netflix
I see it as as unnecessary complication in which it restricts the pool of purchasable credits, and it doesn't have any systemic effect because carbon emissions are global by definitions. Remove Box 3.	Mundys
Offsets should directly relate to Scope 3 reduction levers and the company 's specific value chain. For example, a mining company reliant on the decarbonisation of the Chinese grid should purchase renewable energy certificates (RECs) from China. Nature-based solutions (NBS) should be restricted to sectors that are directly applicable, such as agriculture. Guardrails should prevent NBS from being used as a widespread offset solution for unrelated industries. As above	Accela Research
Introducing an additional requirement of sectoral or geographical alignment of credits with the source of Scope 3 emissions may limit the ability of those using carbon credits to construct diversified portfolios in order to maximise the credibility of their claims. Companies making Scope 3 claims need to consider the varying levels of risk across projects, methods, and geographies. Maintaining a diversified portfolio of carbon credits can help	BeZero Carbon

Comments (compiled)	Respondent name/ organisation
mitigate that risk. Introducing requirements like this may leave companies overexposed in one sector or geography. This should be balanced with other necessary market instruments such as carbon credit insurance.	
Strongly disagree. There is no need to prescribe action in this way. Organizations may chose the high quality credits they want to abate their scope 3 emissions. There is a risk of differentiating credit value based on a wrong criteria and also between companies claim which should be the case. The proposal would limit companies' flexibility in selecting the best value and highest quality credits, as they would be confined to a narrower market. Such constraints could lead to over-concentration in specific areas, reducing the overall effectiveness and availability of carbon credits. do not add this Box	BURN manufacturing
· Companies should have the flexibility to choose the high-quality carbon credits to retire to make the claim, provided that they come from recognized crediting programs. The proposal would limit companies' flexibility in selecting the best value and highest quality credits, as they would be confined to a narrower market. Certain sectors or regions may suffer from liquidity issues, making it difficult to source sufficient credits. Such constraints could lead to over-concentration in specific areas, reducing the overall effectiveness and availability of carbon credits. Moreover, making this mandatory would create perverse market price anomalies as countries/regions with a large surplus of credits compared to their emissions would experience low prices, and vice-versa · This option should be provided as guidance/recommendation and not a requirement. Some organizations already tend to lean towards carbon credits that support location and sector alignment. However, making this a requirement could limit the investment or volume of such purchases if sector and location are cost prohibitive. Organizations may also opt out of participating entirely if they feel as though their investment decisions are being externally driven.	RWEST
We encourage companies to be intentional with their choice of carbon credits, considering several factors which tie in with their broader climate and business strategy, such as geographies, SDGs etc. VCMI could provide brief guidance and recommendations on how companies could align their credit purchases with climate-strategy, however VCMI should avoid implementing requirements or restrictions. Carbon credit purchase strategies vary significantly between companies, and likewise supply and demand mechanisms within the voluntary carbon market are complex. Introducing requirements or restrictions (beyond quality-requirements) on the type of credits that could hinder decision making or climate action. As organisations increasingly transition to longer-term carbon-purchase strategies or project development, they are making decisions which will provide supply of carbon credits for use many years into the future and so these projects could be derailed or adversely impacted.	Climate Impact Partners
It can be an option for companies to use, but not mandatory as it will be restrictive. The selection of high-quality carbon credits retired to make the claim is strongly recommended to be related, but not limited to sectorally and/or geographically - to the sources of scope 3 emissions contained in the company 's scope 3 emissions gap.	Sopra Steria Group

Comments (compiled)	Respondent name/ organisation
Because credits should not be used towards scope 3 targets (or to "address" scope 3 targets), it does not make a difference whether or not credits are limited to related sectoral or geographical scope 3 sources. The end result is that a company is either likely "offsetting" its emissions by purchasing carbon credits from a project outside of its value chain and using them to "address" its scope 3 emissions (or the company gives a strong implication that it is doing this) or it is "insetting" by purchasing credits related to its own-value-chain scope 3 emission sources. All associated claims will be highly misleading. Please see, for example, the Corporate Climate Responsibility Monitor and SBTi 's Evidence Synthesis report on the use of carbon credits (to name a few). We consider that limiting the purchase of credits to activities related to a company 's value chain or geography is likely to increase the confusion around these carbon credits representing a form of "compensation", and therefore we advise against adopting this requirement. Restricting the categories of credits to be purchased is not the right approach to incentivise the transition of a given sector or geography. Carbon credits are not a suitable tool to do that. Carbon credits are designed as a "least cost" mitigation instrument, and they should not be used to try to incentivise specific transitions that they were never designed for. More information / data is needed to understand how purchasing credits related to these sources will allow companies to "plan for investments that will contribute to remove barriers to decarboni[s]ation". Delete the option.	Carbon Market Watch
Disagree this is not always going to be possible and in some instances does not make sense. For example, in the agriculture sector, many companies are looking to the farmer to help them achieve their Scope 3 targets. If one company along the value chain purchases credits from these initiatives then no one else can claim them turning what should be a collaborative approach into a competition for acres.	Bayer Crop Science
Ok to have a recommendation but not as a requirement, since flexibility is valuable and there is no clear rationale for limiting this flexibility from the perspective of the climate benefit. Also, it may be useful or even necessary to consider whether carbon credits that are generated within the company 's scope 3 should be used for the scope 3 claim or whether they in fact reduce the scope 3 emission gap directly (e.g. via insetting).	Perspectives Climate Research
Requiring carbon credits to be sectorally and/or geographically related is an unnecessary, additional barrier and would alter the demand for specific carbon credits as well aspotentially the composition of credit supply in the voluntary carbon market at large. Instead, companies should be able to choose options as the market provides, to accommodate for companies ' unique needs and preferences. Should carbon credits be required to be sectorally and/or geographically related to the sources of corporate scope 3 emissions, VCMI should consider how to determine what counts and doesn 't count as sectorally and/or geographically related. Toward this end, VCMI may consider aligning with existing corporate and sectoral guidelines from bodies such as the Science Based Targets initiative (SBTi).	American Forest Foundation
In principle, this sounds like a good idea. However, in practice, this may have adverse impacts on market dynamics and result in unintended consequences on prices and supply of credits in particular geographic areas / verticals. Propose eliminating this as an option.	Patch
We support additional guidance being provided on ' best practice ' as it relates targeted credit purchases though do not necessarily recommend it as a mandatory aspect of the criteria. In particular, we think it would be helpful to identify and provide guidance on the ' like-for-like ' principle. E.g	Drax

Comments (compiled)	Respondent name/ organisation
permanent emissions (e.g. from fossil fuels) should be compensated for by permanent removals (e.g. geologically stored carbon originating from the atmosphere); land emissions (e.g. deforestation) should be compensated for by land removals (e.g. afforestation)	
1. Strongly disagree. There is no need to prescribe action in this way. Organizations may chose the high quality credits they want to abate their scope 3 emissions. The proposal would limit companies' flexibility in selecting the best value and highest quality credits, as they would be confined to a narrower market. Certain sectors or regions may suffer from liquidity issues, making it difficult to source sufficient credits. Such constraints could lead to over-concentration in specific areas, reducing the overall effectiveness and availability of carbon credits. Moreover, making this mandatory would create perverse market price anomalies as countries/regions with a large surplus of credits compared to their emissions would experience low prices, and vise-versa.In our experience, organizations do actively tend to lean towards carbon credits that support location and sector alignment. However, making this a requirement could limit the investment or volume of such purchases if sector and location are cost prohibitive. Organizations may also opt out of participating entirely if they feel as though their investment decisions are being externally driven. 1. This text should be presented as a recommendation not a requirement. Companies have the flexibility to choose the high-quality carbon credits retired to make the claim at their choice to cover the company 's scope 3 emissions gap, provided that they come from recognized crediting programs, such as VCMI, CCP, ICROA, CORSIA and governmental initiatives.	IETA
We agree with the recommendation that companies should consider aligning their carbon credit purchases with the specific sources of their scope 3 emissions. By prioritising projects that address emissions from similar industries or regions, companies can demonstrate a more targeted and impactful approach to their climate mitigation efforts. However, we also believe that it is essential to maintain a degree of flexibility in carbon credit selection. While aligning projects with scope 3 emissions can be beneficial, it may not always be feasible due to factors such as project availability, cost, or specific company objectives. The goal should be to encourage companies to make informed and responsible carbon credit purchases that contribute to their overall climate mitigation efforts and provide funding to high-quality projects. VCMI claims must provide the greatest flexibility in the short term. Therefore, the alignment of purchases to sources can be noted but should not be a requirement nor a restriction on use.	Carbonplace
We do not think this should be a requirement for the claim. As the text notes, such a requirement could be contrary to companies ' internal strategies and could limit the cost-effectiveness of the use of credits. More importantly, from the perspective of addressing climate change, the key issue is ensuring that carbon credits represent real, durable, and additional reductions i.e., that they are high quality. Because Step 3 of the Claim already (appropriately, in our view) requires that companies buy high-quality credits, there is no further need to restrict the choice of credits. Finally, from a practical point of view, definitions of what it means for carbon credits to be "intentionally related ... to the sources of scope 3 emissions"□ are not yet widely agreed on and indeed are the topic of active consideration (including, in the distinct but related area of EACs, by the AIM Platform). As a result, there is currently no widely accepted means of determining what carbon credits would meet such a requirement. Having said that, we agree that the use of "within-value-chain carbon credits"□ is a promising approach that could help address some other	Center for Climate and Energy Solutions

Comments (compiled)	Respondent name/ organisation
stakeholders ' concerns around the use of carbon credits for Scope 3, and that could encourage companies to seek out carbon credits that have as strong a nexus as possible with their Scope 3 emissions. Encouraging companies to be more intentional about the way they procure carbon credits can generate more awareness of a company 's impact beyond the readily measurable scope 3 boundary. As discussed in a recent brief from Winrock Net Zero Services for the Energy Transition Accelerator, encouraging companies to purchase credits that are directly related to the scope 3 emissions gap could better align with one of the arguments made in the recent SBTi Scope 3 discussion paper. The challenges related to the mitigation of scope 3 emissions are widely acknowledged across companies and standard setters. The recent SBTi discussion paper, among several other recommendations, points to a growing recognition that carbon credits should be purchased in a manner that addresses material causes and sources of scope 3 emissions on most occasions upstream value chain emissions that address decarbonization opportunities in supply chains and procurement processes. However, we see this approach as more of an emerging best practice to be explored rather than something that VCMI should require in the Scope 3 Claim. No changes required	
IATP agrees with the New Climate Institute analysis of this option. We add that any use of Envrionmental Attribute Certificates to meet near term targets requires that the EAC have criteria and implementation tools to demonstrate the EAC results in Scope 3 emissions reductions. IATP is not aware of agricultural EACs, e.g. sustainable soy or cocoa certificates with emissions reduction requirements. The use of EAC surely have envrionmental benefits, e.g., in building soil health, and are beneficial for corporations that sponsor, support or use them. Investment in EACs is readily compatible with a BVCM contribution model but much less so as quantifiable contribution to Scope 3 emissionns reduction intentionally equivalent sectorally and geographically	Institute for Agriculture and Trade Policy
exemplify the "internal criteria"	Institute for Agriculture and Trade Policy
following "market solution" add "even though this recommendation may reduce the corporation's Climate Value at Risk."	Institute for Agriculture and Trade Policy
The feasibility of this recommendation depends strongly on the industry a company is operating in. For many companies a large share of emissions in Scope 3 is related to purchased goods and services and it will be very difficult to source carbon credits from projects related to the sources. The VCM is already very complex and companies are struggling to source high quality projects which contribute to different SDGs. There is no need to make the sourcing process even more complex. The overall contribution to the global climate goals should be top priority. Delete the recommendation.	ClimatePartner
Companies should be allowed to choose which carbon credits to use based on their preference, e.g when it comes to co-benefits. As long as the credits are high quality, they should be able to choose freely. Delete the recommendation.	ClimatePartner

Comments (compiled)	Respondent name/ organisation
We don’t agree with the suggestion to recommend the use of credits associated to same type of emissions. Considering the negative impacts for requiring like-for-like matching of removal or storage types within the context of potentially limited carbon removal budgets given physical and financial limitations, don’t limit investment in these project types by requiring matching of emissions type with storage type (biogenic or geologic), but rather, ensure only high quality nature-based removals credits can be utilized towards neutralization (e.g. those that receive ICVCM approval). VCMI should strive for maximum flexibility with the carbon credits used towards the claim, as long as quality and integrity guard rails are met.	WBCSD - The NCS Alliance
Box 3: Option to be considered "â… selection of the high-quality carbon credit they chose to retire to make a Scope 3 Claim and plan for investments that will contribute to remove barriers to decarbonization."□: Generally speaking, are we not demanding too much from a company that is unable to reduce its Scope 3 emissions by asking it to both invest in reducing Scope 3 emissions and purchase credits to offset its excess Scope 3 emissions? What if all the investment and effort were focused solely on reducing these emissions or solely on purchasing credits? It should be considered that: i) Scope 3 emissions are not under the control of the company making the claim, and ii) the company that is part of Scope 3 has likely already made investments and was unable to reduce its Scope 1 emissions (in other words, reducing these emissions is already a significant challenge, requiring substantial investment).	Carbonext
Box 5: Option to be considered As an additional recommendation, the selection of high-quality carbon credits retired to make the claim could be intentionally related - sectorally and/or geographically - to the sources of scope 3 emissions contained in the companys scope 3 emissions gap."□: We primarily disagree with the sectoral restriction, as it could become another bottleneck in an already complex market. Regarding the geographical restriction, we partly agree, as preventing institutions from accessing markets outside their geographical areas of operation could undermine one of the markets greatest potential benefits: channeling capital into emerging countries and developing sustainable sectors. We agree with the national geographical restriction when it benefits emerging economies.	Carbonext
VCMI should only optionally suggest that companies retire credits sectorally or geographically related to the company's value chain, as a strict requirement may overrestrict the available carbon credit supply to a company.	The Nature Conservancy
In the absence of universal criteria enforcing the high-quality label of carbon credits, we should not be arbitrarily enforcing rules around the purchase of credits related to location or sector. Limiting purchase options may limit market participation. We do agree with the requirement of purchasing high-quality or CCP-approved credits. None. None.	Invert
We recommend including this as one of a few potential criteria that a company may consider rather than a specific recommendation, focusing on high-quality, nature-based solutions (both reductions and removals). For example some companies may choose to prioritize credits based on their ability to pay, the potential brand value they bring to their organization, or their prioritzation of particular co-benefits. As long as they're following high-integrity standards for their selection of credits (eg. ICVCM), companies should have flexibility to invest in whatever way most fits their business goals. Implying that investing in carbon credits requires additional resources to make the selection of the "correct" credits could also reduce uptake	Conservation International

Comments (compiled)	Respondent name/ organisation
of the practice. Instead offer examples of how companies could prioritize their purchases to meet their business needs. Can pull from scenarios SBTi's BVCM report offers on different companies approaches to BVCM.	
This alternative proposal could potentially mitigate some of the risk that the Scope 3 Claim distracts from and delays action. If carbon credits derive from equivalent activities, it is possible that they may not present a significantly cheaper alternative and a disincentive to direct action. This would also ensure that the specific transition associated with the emission source remains addressed in some way, which would also be beneficial for the company in terms of supporting the emergence and development of technologies that they will later rely on to directly reduce their own emissions footprint. However, this depends on the activities being sectorally and geographically equivalent, rather than sectorally or geographically related, which could still imply the use of carbon credits from various activities and not necessarily one of equivalence to the emissions source. The use of commodity EACs within the supply shed (see NewClimate Institute 2024, forthcoming) might be preferable to the use of carbon credits from sectorally related activities, since commodity EACs could if well defined target the specific technologies and transitions necessary to be aligned with 1.5 °C compatible pathways. By comparison, carbon credits could be issued from measures for marginal emission reductions to conventional technologies that are not necessarily supporting the transition to new technologies. This alternative proposal could potentially mitigate some of the risk that the Scope 3 Claim distracts from and delays action. If carbon credits derive from equivalent activities, it is possible that they may not present a significantly cheaper alternative and a disincentive to direct action. This would also ensure that the specific transition associated with the emission source remains addressed in some way, which would also be beneficial for the company in terms of supporting the emergence and development of technologies that they will later rely on to directly reduce their own emissions footprint. However, this depends on the activities being sectorally and geographically equivalent, rather than sectorally or geographically related, which could still imply the use of carbon credits from various activities and not necessarily one of equivalence to the emissions source. The use of commodity EACs within the supply shed (see NewClimate Institute 2024, forthcoming) might be preferable to the use of carbon credits from sectorally related activities, since commodity EACs could if well defined target the specific technologies and transitions necessary to be aligned with 1.5 °Ccompatible pathways. By comparison, carbon credits could be issued from measures for marginal emission reductions to conventional technologies that are not necessarily supporting the transition to new technologies.	NewClimate Institute
It is up to companies to decide whether or not to relate carbon credits to Scope 3, and should not be restricted in their choice of carbon credits to use.	TOKYO GAS CO.,LTD.
FincoEnergies suggests that VCMI allow for both options in its Scope 3 Claim framework. This would enable customer choice depending on their specific goals and circumstances and better encourage the uptake and scale up of the VCMI Scope 3 Claim framework. Enabling both options would: -Provide an avenue for companies who have a strong desire to target their impact more closely to their value chain via an carbon credit insetting approach. This option also has the potential for endorsement by bodies such as SBTi to be used to reduce a company 's scope 3 inventory emissions (as currently being explored by SBTi in its review of its Corporate Net Zero Standard, as discussed in its July 2024 Discussion Paper).	FincoEnergies

Comments (compiled)	Respondent name/ organisation
-Also provide an avenue for companies to use carbon credits not associated with their value chain. This option can better align with the goals and circumstances of some companies, and represents a more flexible and likely cost-effective approach. It would also likely greatly support the wider-spread uptake and scale up of the VCMI Scope 3 Claim framework, particularly in this early phase with carbon credit insetting and carbon credits for scope 3 being in a state of relative infancy. Restricting the use of carbon credits to only those sectorally / geographically related to the company 's value chain would place a unnecessary and too great a restriction on users of the Scope 3 Claim framework. The climate impact of both options is the same, and it is FincoEnergies ' position that whether that impact is focused more closely on the company 's value chain should be a decision left to the company in reference to its specific circumstance and goals. Such a restriction would also be expected to somewhat stifle the uptake and scale up of the Scope 3 Claim system, which would be missed opportunity. Survey question submission.	
This could be a recommendation, but should not be mandatory. This approach could be beneficial where the use of carbon credits can be demonstrated to contribute to overcoming the barriers to Scope 3 decarbonization identified by the company. However, implementing this as a strict requirement could impose restrictions on company credit procurement, leading to potential challenges. For instance, once the ICVCM's Core Carbon Principles (CCPs) are fully implemented, the pool of credits eligible for use toward a Scope 3 Claim will be geographically and sectorally limited. Certain credit types may not be eligible, and some methodologies may need to be revised to meet CCP eligibility criteria, which could further restrict their geographical applicability (such as renewable energy credits). Therefore, enforcing a strict requirement for credits to be intentionally related could inadvertently disincentivize participation from companies in certain sectors or geographies, particularly those with Scope 3 emissions gaps in those areas. This limitation could hinder the reach and effectiveness of the Claim in promoting reductions in Scope 3 emissions. Additionally, this approach may contradict the principle that carbon credits should focus on abatement where costs are lowest. If greater abatement can be achieved at the same cost in a different location or sector than the Scope 3 challenge, it could be argued that prioritizing alternative types of carbon credits would be more effective for achieving rapid global emission reductions. We suggest that geographical or sectoral requirements should not be included in the mandatory requirements, but can be included as recommendations in associated guidelines.	MSCI
This suggestion will disadvantage projectcommunities who have not given up their land for extractive activities, and who have no link to sectors.	Anonymous

Comments (compiled)	Respondent name/ organisation
We recognize that this potential requirement may seek to align with SBTI 's potential scenario requiring that carbon credits could be required to be traceable to a company 's Scope 3 value chain. However, we strongly disagree with making this a requirement. Without universal criteria for defining high-quality carbon credits, it is not advisable to impose arbitrary rules regarding the purchase of credits based on location or sector. Reducing purchase options by requiring sectoral or geographic matching may limit market participation by reducing the pool of credits available and could be potentially cost prohibitive. It is unnecessary to mandate such actions. Companies should have the flexibility to select high-quality credits for abating their Scope 3 emissions, as long as these credits are sourced from recognized crediting mechanisms. Corporations should be able to demonstrate how the carbon credits meet high-quality standards, such as those endorsed by ICVCM/CCP, CORSIA, ICROA, or other government-recognized crediting programs. We strongly disagree with making this a requirement. Please see previous comment.	Anew Climate
Directing companies to source sectorally relevant carbon credits could potentially help bolster the credibility of the Scope 3 claim since companies would focus on solutions that they will ultimately need to achieve Scope 3 reductions.	Netflix
Carbon emissions are global,it makes no sense to restrict companies' ability to purchase the best credits for these arbitrary reasons.	Mundys
Having companies retire credits that are related sectorally or geographically to their Scope 3 emissions should only be an optional recommendation for companies, since, as VCMI identified, it would heavily restrict the types of credits companies can buy. Credit quality should be the most important priority for a company when procuring credits, so adding an additional requirement before fully understanding what the supply of CCP credits will look like could represent a major barrier for companies. So far, more than 50% of credits in the market will not receive a CCP label, meaning that CCP supply in the near future will be very limited. See evidence here: https://icvcm.org/carbon-credits-from-current-renewable-energy-methodologies-will-not-receive-high-integrity-ccp-label/ NA	The Nature Conservancy
Offsets should directly relate to Scope 3 reduction levers and the company 's specific value chain. For example, a mining company reliant on the decarbonisation of the Chinese grid should purchase renewable energy certificates (RECs) from China. As above	Accela Research
We respectfully disagree with the idea that the selection of high-quality carbon credits retired to make the claim should be intentionally related sectorally and/or geographically to the sources of Scope 3 emissions contained in the company 's Scope 3 emissions gap. While this approach may appear to encourage companies to focus on reducing emissions in their specific supply chain or sector, it creates unnecessary restrictions that undermine the flexibility and cost-effectiveness of carbon market solutions. Carbon markets should focus on the quality and integrity of the credits rather than imposing geographic or sectoral constraints on their selection. The primary goal should be ensuring that credits represent real, duration-matched emissions removals regardless of where or how they are generated. Then, companies that produce high-quality offsets can sell to those whose operations entail emissions. This is how markets work: supply meets demand without reference to central planning. With proper accounting in place, offsets (removals) can therefore be netted against the residual emissions, which themselves are incurred across many geographies and sectors as a result of embodied emissions in the global supply chain of a product or company 's inputs. This approach	E-liability Institute

Comments (compiled)	Respondent name/ organisation
drives greater overall decarbonization and helps address climate change more effectively than artificially narrowing the scope of carbon credit selection.	
We recognize that this potential requirement may seek to align with SBTI 's potential scenario requiring that carbon credits could be required to be traceable to a company 's Scope 3 value chain. However, we strongly disagree with making this a requirement. Without universal criteria for defining high-quality carbon credits, it is not advisable to impose arbitrary rules regarding the purchase of credits based on location or sector. Reducing purchase options by requiring sectoral or geographic matching may limit market participation by reducing the pool of credits available and could be potentially cost prohibitive. It is unnecessary to mandate such actions. Companies should have the flexibility to select high-quality credits for abating their Scope 3 emissions, as long as these credits are sourced from recognized crediting mechanisms. Corporations should be able to demonstrate how the carbon credits meet high-quality standards, such as those endorsed by ICVCM/CCP, CORSIA, ICROA, or other government-recognized crediting programs.	Rubicon Carbon
The Scope 3 Claim should acknowledge the varying levels of carbon credit risk across geographies and sectors. VCMI should require participating companies to effectively account for associated risk and prevent potential overexposure by using project-level assessments and a balanced portfolio approach to credits. For example, exposure concentrated in a given region can leave buyers ' carbon credit portfolios overly exposed to fire or disease risk for NBS projects, or legal risk at a country level.	BeZero Carbon
It should be noted that, given the limited availability of high-quality credits in the market today, the option of sectoral linkage may not be possible for most companies and will significantly limit the impact of using a market-based instrument to drive financing toward decarbonisation. Even as this market matures, relying more heavily on engineered removals with the clearest MRV and additionality claims (e.g. direct air capture, biochar, enhanced rock weathering), sectoral linkages will be rare. We would recommend framing the language here as a ' recommended best practice where possible ' to make clear that not all companies should be expected to meet this higher standard. Our view is that recommending this approach, as opposed to imposing a requirement, makes sense given the current nascent state of the market. Additionally, the text should emphasise a direct link to the company 's emissions and activities, not just geographical or sectoral approximation. Geographic proximity of carbon credit purchases to a company 's activities could risk concentrating resource and finance flows where the larger and leading companies are headquartered or have operations, potentially exacerbating an already critical inequality in climate finance between North and South. As the climate impact of a carbon removal is not dictated by its location, the priority should be integrity and permanence as opposed to perceived linkages to the company 's emissions.	Anonymous

Comments (compiled)	Respondent name/ organisation
In the absence of universal criteria enforcing the high-quality label of carbon credits, we should not be arbitrarily enforcing rules around the purchase of credits related to location or sector. This could create a differentiation between credits or between companies claim based on wrong indicators and not reflecting the true impact of the activity. We should absolutely avoid this and not guide any company in this direction adjust text	BURN manufacturing
It can be an option for companies to use, but not mandatory as it will be restrictive. Making it Mandatory, risks companies choosing to not participate. Text is OK. Text OK.	Sopra Steria Group
We agree that, if carbon credits are used, they must be of the highest quality possible. We do not agree with the proposal that they must be intentionally related sectorally and/or geographically to the sources of scope 3 emissions contained in the company 's scope 3 emissions gap. This is explained in the section "Box 3 select carbon credit". No further additions to our response to the survey question.	Carbon Market Watch
Disagree this is not always going to be possible and in some instances does not make sense. For example, in the agriculture sector, many companies are looking to the farmer to help them achieve their Scope 3 targets. If one company along the value chain purchases credits from these initiatives then no one else can claim them turning what should be a collaborative approach into a competition for acres.	Bayer Crop Science
VCMI claims must provide the greatest flexibility in the short term. Corporates should have the flexibility to use a wide range of credits at the early stage of their decarbonisation path. As previously stated, although we recognise the benefit of aligning the selection of high-quality carbon credits with the company 's scope 3 emissions, it may not always be feasible due to factors such as project availability, cost, or specific company objectives. To prescribe an alignment may be an unnecessary barrier to companies making meaningful progress towards a Scope 3 claim. We strongly support the VCMI's clear guidance on the use of high-quality carbon credits to address scope 3 emissions. By requiring companies to retire CCP-approved credits, the VCMI is helping to ensure the integrity and effectiveness of carbon offsetting initiatives. This approach provides a practical and flexible framework for companies to source high-quality carbon credits while the market continues to develop. This approach strikes a balance between ensuring the integrity of carbon offsets and allowing for some flexibility in credit procurement. However, we would like to emphasise the importance of considering market dynamics and the potential for supply-demand imbalances. As the demand for high-quality carbon credits increases, it is essential to ensure that there is a sufficient supply of credits available to meet the needs of companies. The VCMI should continue to support the development of the voluntary carbon market by encouraging the issuance of high-quality credits and promoting transparency and accountability. VCMI claims should also promote demand for carbon credits. This can help to incentivise the	Carbonplace

Comments (compiled)	Respondent name/ organisation
development of new projects and ensure that credits are allocated efficiently. It is also important to consider the broader impact of carbon offset projects. Factors such as project co-benefits, additionality, and permanence should be taken into account when evaluating the quality of credits.	
As discussed in box 3 response, companies should have flexibility to invest in carbon credits that meet key quality criteria and meet their business needs. Sector or geographic relationship to company may help to meet these needs, but other factors may also be important. Companies should have flexibility to prioritize based on their business needs to maximize uptake. Including a requirement or recommendation of this sort will likely depress demand for credits from low resource, global south, and non-supply chain connected projects.	Conservation International

20 Option box 5 – no limit is set on the emissions gap

Comments (compiled)	Section of the Claim	Respondent name/ organisation
this is much closer to a better approach. it still isn't a scope 3 claim, but supporting companies to A establish a carbon budget which can be spent on things to help them decarbonise in the future and B spend money on credits in the immediate term as a way of contributing something whilst they do so puts more incentives in the right place. this would still benefit from a suggested carbon fee - but as this is targeted at companies with less progression than others, and the claim is on ramping not achieving, the fee could start lower and raise over time	Option boxes	Anonymous
Feedback on Box 5: Option to be considered Element 1: We do not support this option unless the second option (see below) has been fully exhausted. Element 2: We support the investment in measures to overcome the remaining scope 3 barriers, before any purchase of credits, regardless of any exceeding the limit on the credits used for the claim. We further posit that no credits should be purchased if this in any way impedes the ability to invest in reduction measures within the value chain including investments to overcome barriers to reduce emissions in scope 3.	Option boxes	Anonymous
It looks like a very good idea! It would drive investments towards concrete actions in a context of limited climate budgets from companies. Just was wondering how could it be verified? Retirement of high quality carbon credits can be quite straightforward in verifying but investment data is sensitive and harder to verify. -	Option boxes	Marine Klobut
This would provide more flexibility but we understand how this would work in practice, particularly point 2. Companies are struggling to address their scope 3 emissions so how would they be able to identify the measures to overcoming scope 3 barriers and invest in them. If they could do this they would not have such a large emissions gap in the first place. Understand the idea to give more flexibility and not exclude companies who are making genuine efforts but due to challenges still have a gap of over 24%. more detail on how it could work is needed and would also need to think about how to manage any reputational issues on letting companies make a claim when they are only using credits for a proportion of the emissions gap. Another approach would be to have no limit on the emissions gap and let companies use credits for the full amount. It could be argued that any companies who could make the claim are at least measuring its scope 3 emissions (many still are not). This could also act as an incentive for some of these companies to start measuring scope 3 and taking action via credits and in value chain investments. This might risk criticism of letting companies off the hook by using credits instead of making efforts to reduce scope 3. This would be the simplest approach but perhaps does bring in more reputational risk.	Option boxes	Philip Brady

Comments (compiled)	Section of the Claim	Respondent name/ organisation
For me the 24% was already too high so I am afraid I'm not a huge fan of this but I see the intention. How would you decide what an acceptable investment to overcome scope 3 barriers is? I'd need to understand this more to properly comment.	Option boxes	Scarlett Benson
We note that this is a "no guardrail" alternative. We do not support this option because it would allow companies that are far off track to use the claim, assuming the claim is to retain credibility.	Option boxes	Claire Wigg
While we encourage the investment of climate finance into measures that overcome scope 3 emissions reduction barriers, not putting a limit on the emissions gap is a very bad idea and could further disincentivize companies from meeting their near-term science-based targets. A limit on the emissions gap must absolutely happen, and should be much lower than the 24% proposed in order to align with science-based pathways to meet the Paris Agreement.	Option boxes	Libby Blanchard
Our view is that a limit should be set. Not having a limit would be helpful so that more companies can participate in the Scope 3 claim, however doing so would devalue the claim for the other companies that are making progress (albeit insufficient) on Scope 3. The latter outweighs the former, especially with 75% of companies off-track for Scope 3 having gaps of between 0-24%. Not to go ahead with this box.	Option boxes	Anonymous
Agree with the alternative approach as it provides companies more flexiblity for making Scope 3 claims while ensuring they compensate for their gap and invest in future decarbonization initiatives. None.	Option boxes	Invert
It seems strict for companies that exceed the 24% threshold despite making efforts to reduce Scope 3 emission. Meanwhile, concern remain on the validity of the alternative plan stated in "BOX 5: OPTION TO BE CONSIDERED - NO LIMIT IS SET ON SCOPE 3 EMISSIONS GAP". For companies that are already making investments according to their own climate transition plan and have also made investments to overcome remaining Scope 3 emission reduction barriers, the effectiveness of making additional investments for the portion that exceeds the limit of the carbon credits use is questionable. Investment decisions may become more difficult.	Option boxes	Nomura Research Institute, Ltd. Financial Technology Solution Division
FincoEnergies supports the Box 5 option in the place of that outlined in Step 3 of the Scope 3 Claim document - i.e. we support the removal of the participation barrier for companies with a gap larger than 24% but otherwise satisfy all other requirements of the Scope 3 Claim framework. FincoEnergies suggests VCMI takes this more inclusive approach, enabling the participation of companies with gaps >24%. We believe there should be a strong focus encouraging participation in the system to maximise its uptake, upscaling and thus impact. To participate in the framework such companies still need to satisfy all its other requirements which demonstrate that they are a company that is actively pursuing and achieving GHG reductions towards its targets. Such commitment should be rewarded with being able to participate in the framework while they simultaneously work to reduce their emissions gap.	Option boxes	FincoEnergies

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The 24% credit-use cap placed on companies with >24% gaps (element 1 of Box 5) ensures that they still need to maintain a strong focus on reducing their emissions gap via the investment measures outlined in element 2 of Box 5. Also, the Scope 3 Claim appears to calculate the emissions gap retrospectively, using the 'most recently reported scope 3 emissions"□, which we take as meaning a companys most recent final and reported annual scope 3 GHG inventory report. For example, a company in 2025 is using its annual scope 3 GHG inventory report for 2024, resulting in Scope 3 Claim carbon credits being purchased to take responsibility for the previous year. If this is not what is intended, FincoEnergies suggests VCMI provides further clarity in the Scope 3 Claim document on this aspect. If instead what is intended is for a company to purchase Scope 3 Claim-approved credits for the current year emissions gap, then the company will need to rely on estimated emissions until the completion of the year. For example, a company in July 2025 would need to estimate its 2025 year-end emissions gap in order to determine whether this is less than the 24% participation barrier. This can create the undesirable situation where a company may be investing in credits throughout the year to make a Scope 3 Claim while assuming an estimated gap of say 20%, but due to unforeseen factors or inaccurate estimate the gap could end up exceeding 24% therefore prohibiting participation that year. The consequence being their efforts and investments being 'wasted for that year in terms of their VCMI Scope 3 Claim ambitions. This could deter interest in participating in the Scope 3 Claim system. FincoEnergies therefore views this operational implementation complication as further reason for VCMI to change the 24% from a participation barrier to a credit-use cap. For transparency, VCMI could also consider a slight nuance in its system to differentiate between those with a gap larger than 24% and those with a gap lower than 24%. Although, this should be a neutral and no-implication statement, not negative, because such companies should be applauded for their significant voluntary efforts despite their challenges.		
How to quantify "investment in measures to overcome remaining Scope 3 barriers" in relation to the overall Scope 3 emissions gap does not appear to be straightforward. This presents a challenge, especially when compared to the relative simplicity of quantifying the use of credits to "address" the Scope 3 emissions gap on a "tonne-for-tonne" basis.	Option boxes	MSCI
To make follow-on claims companies need to demonstrate progress on indicators related to barriers (page 17 of VCMI Scope 3 Claim document). To demonstrate progress, investment in measures to overcome the barriers will be required therefore is point (2) actually creating additional/new action and benefits to emission reduction?	Option boxes	AHDB

Comments (compiled)	Section of the Claim	Respondent name/ organisation
It is likely that such investments would form part of the disclosures that companies are required to make regarding: i) their plans to reduce Scope 3 emissions, and ii) their progress toward implementing those plans and overcoming the related barriers. This approach carries the risk of companies being credited twice for the same action.	Option boxes	MSCI
The VCMI's analysis indicates that 75% of companies meeting the requirements for reducing Scope 1 and 2 emissions would have a Scope 3 emissions gap of less than 24%. Therefore, the current threshold for the Scope 3 emissions gap already addresses the vast majority of potentially eligible companies. Introducing changes that could complicate the understanding of the Scope 3 Claim approach for stakeholders in an attempt to include a small segment of companies could pose a significant risk.	Option boxes	MSCI
All companies with a Scope 3 emissions gap should be investing in reducing that gap as part of their climate targets. Therefore, it needs to be considered whether this investment should be viewed as a substitute for using credits to address the emissions gap; they are complementary efforts, not substitutes. We would suggest removing this option.	Option boxes	MSCI
We strongly encourage VCMI to consider removing the limit on Scope 3 emissions gap in this alternative approach. We do NOT believe VCMI should restrict companies leveraging the Scope 3 Claim to only those companies whose Scope 3 emissions gap is equal to or lesser than 24%. We advocate against the 24% threshold; though the rationale for this threshold is documented elsewhere in the document by VCMI, it is based on a single study with potential selection bias, and is ultimately a somewhat arbitrary, theoretical number. There will certainly be many companies that are genuinely trying to get back on track and making significant investments in reducing their Scope 3 emissions, who will be excluded if this arbitrary threshold is implemented, and we support efforts to better enable flexibility in the Scope 3 claim as a mechanism for companies to show leadership by compensating for the Scope 3 emissions gap by purchasing high-quality carbon credits, in their effort to get back on track. Setting guardrails based on the use of high-quality carbon credits, rather than preventing companies with too large an emissions gap from leveraging this mechanism the size of the emissions gap, allows more companies to deliver climate action. Otherwise, there are less incentives for companies exceeding 24% of their scope 3 trajectory emissions to make additional investment (via carbon credits) in parallel with other progress towards decarbonization. All that said, we do not support requiring #2 in this alternative approach, that companies must also invest in other measures to overcome Scope 3 barriers to enable this Scope 3 Claim, since disclosure of how a company is addressing their Scope 3 barriers is already a requirement; rather, we believe investing in carbon credits (verified, quantifiable mitigation) should be the focus here and acceptable for addressing this larger emissions gap all scope 3 emissions.	Option boxes	Anew Climate
As mentioned in our other comments on the 24% cap on credit use, we strongly prefer the option presented in Box 5. We suggest incorporating this alternative approach as the principle guardrail in the Scope 3 Flexibility Claim.	Option boxes	Rubicon Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Yes I like this a lot more than the main proposal. 2. investment in measures to overcome remaining scope 3 barriers, which in turn will reduce future emissions, for the portion that exceeds the limit of the carbon credits use. Such measures have to be listed and their rationale explained.	Option boxes	Mundys
Measures that increase the opportunities for companies to take action on reducing emissions within or related to their operations should be encouraged, as long as guardrails are in place to ensure accountability, transparency, and environmental outcomes. VCMI and other corporate decarbonisation target setting standards have shown significant early impact in motivating private sector action and investment. Growing frustration with the difficulty of meeting targets risks alienating - and has in fact already alienated a significant proportion of companies that originally signed on to SBTi, for example. Disincentivising participation risks further jeopardising global climate change mitigation efforts. This approach does just that. It expands the pool of companies that can explore the Scope 3 Claim, encouraging them to devote resources to addressing scope 3 barriers, while limiting their ability to resort solely to high-quality carbon credits. The Scope 3 guardrails and conditions ensure that companies are taking steps to directly reduce emissions across scopes, mitigating the risk of delayed corporate action. We would recommend greater clarity on how VCMI defines 'investment in measures to overcome scope 3 barriers, how these investments will be tracked and verified, and how the investment amount required to satisfy the Scope 3 Claim conditions under this approach is calculated.	Option boxes	Anonymous
We must promote the use of carbon credits to offset/abate all remining emissions	Option boxes	BURN manufacturing
Putting in place a maximum limit may exclude some companies from making a Scope 3 claim and take responsibility for their reductions gap, however not having limits and guardrails in place is likely to invite the perspective that the claim is a way to allow companies not to take action in delivering on reduction targets. Ultimately, for those companies who are not on track to deliver their reduction targets, it is even more important that they focus on putting an action plan in place - however it should still be highly recommended that they take responsibility over their currently unabated emissions and address the difference with carbon credits. Limiting the gap to 24% may disincentivise those companies with a larger gap from leveraging the Scope 3 Claim or using carbon credits to contribute towards climate action and climate strategies. Separately, if an organisation is consistently falling behind its reduction targets, perhaps there are additional requirements that should be put in place on those organisations within their core Carbon Integrity Claim if there is no demonstration of material	Option boxes	Climate Impact Partners

Comments (compiled)	Section of the Claim	Respondent name/ organisation
improvement over a number of years. It is a fine balance between encouraging companies to take as much action towards climate impact as possible, without undermining the credibility of the claim		
None. None.	Option boxes	Sopra Steria Group
We do not support this option. We support having a limit on the emissions gap (to exclude companies that take no action in their scope 3), rather than on the use of carbon credits. We do not see a rationale for limiting carbon credits use as an effective means to incentivise investments in scope 3 reductions. The two different elements included in this option make the claim less clear and harder to understand.	Option boxes	Perspectives Climate Research
We do not agree with this option. We believe it would diminish the credibility of the S3 claim even further and would result in an even larger threat to our collective climate goals compared to the proposed alternative.	Option boxes	Carbon Market Watch
AFF supports an option that allows companies to still participate in VCMI Scope 3 even if they cannot meet the 24% limit restriction. This flexibility allows a greater diversity of corporate participants in VCMIs frameworks. However, as this option is currently written out, it is difficult to act upon, particularly the second element. The second element allows companies to "invest in measures to overcome remaining scope 3 barriers", in addition to retiring credits up to 24% of the companys scope 3 trajectory emissions. It is difficult to determine what would be considered a sufficient investment, let alone an "additional" investment that the company would have taken regardless of the scope 3 considerations.	Option boxes	American Forest Foundation
· We agree exceptions could be relevant for certain companies where growth in corporate emissions may not only be anticipated, but potentially desirable e.g. pioneers of low carbon technologies with an ambitious growth strategy · We recommend that where any exception above the limit is made, efforts are made to follow the 'like-for-like principle	Option boxes	Drax
1. While the approach provides companies more flexibility for making Scope 3 claims, constraining the use of credit will not help companies to decarbonize. We do NOT believe VCMI should restrict the use of carbon credits for making a claim. Another alternative approach shall be implemented where there is no limit on the use of high-quality carbon credits to cover the entirety of their scope 3 emissions gap. We strongly encourage VCMI to implement an alternative approach that allow for the use of carbon credits to cover the whole gap. We do NOT believe VCMI should restrict companies leveraging the Scope 3 Claim to only those companies whose Scope 3 emissions	Option boxes	IETA

Comments (compiled)	Section of the Claim	Respondent name/ organisation
gap is equal to or lesser than 24%. We advocate against the 24% threshold; though the rationale for this threshold is documented elsewhere in the document by VCMI, it is based on a single study with potential selection bias, and is ultimately a somewhat arbitrary, theoretical number. There will certainly be many companies that are genuinely trying to get back on track and making significant investments in reducing their Scope 3 emissions, who will be excluded if this arbitrary threshold is implemented, and we support efforts to better enable flexibility in the Scope 3 claim as a mechanism for companies to show leadership by compensating for the Scope 3 emissions gap by purchasing high-quality carbon credits, in their effort to get back on track. Preventing companies with too large an emissions gap from leveraging this mechanism will not help decarbonization efforts. Otherwise, there are less incentives for companies exceeding 24% of their scope 3 trajectory emissions to make additional investment (via carbon credits) in parallel with other progress towards decarbonization. 1. Remove reference to the 24% limit. In this alternative approach, there is no limit on the use of high-quality carbon credits to make the claim. Companies are expected to take action for the entirety of their scope 3 emissions gap.		
As previously stated, we believe that excluding companies with emissions gaps larger than 24% from the possibility of purchasing high-quality carbon credits and continuing to make progress towards their scope 3 emissions reduction targets is counterproductive. If companies are genuinely putting effort towards decarbonisation, this should be recognised and they should still have a pathway to making a scope 3 claim.	Option boxes	Carbonplace
Regarding the second proposed element focusing on investing in measures to overcome scope 3 barriers, it would be difficult to attribute a GHG mitigation outcome (either a reduction or removal) based on a financial investment. If this were to be allowed, a methodology to make such a matching would have to be offered, or a reference to another initiative offering such a methodology. The concept of interdependencies could be explored (e.g. for an airline the primary interdependency is the availability of SAF at a competitive price, then investing in a new SAF production facility is linked to the airline scope 3 emissions target boundary). See above comments on emissions gap limit to be covered with credits, and on interdependency methodology to establish a dollar to GHG equation.	Option boxes	Center for Climate and Energy Solutions
the scope 3 claim is already a watered-down compromise. It would loose integrity if the requirements become too loose. delete option	Option boxes	ClimatePartner
This may provide an interim incentive for the companies with the gap much lower than 24%, thus allowing them to communicate about other methods used for addressing scope 3 emissions, including investments in overcoming them. This could enable companies to communicate about the “alignment targets” on either entity or product level in their value chains. Some guidelines should be added to ensure the additional investments outlined in (2) are proportionally significant. This could be based on a $/ton reference figure or some other method.	Option boxes	Conservation International

Comments (compiled)	Section of the Claim	Respondent name/ organisation
No comment other than to repeat FincoEnergies position that the 24% should not be used as a barrier to participation in the Scope 3 Claim framework. Instead we suggest that VCMI retains the 24% solely as a cap on credit usage (as per the option in Box 5), and not as a participation barrier to its Scope 3 Claim framework.	Option boxes	FincoEnergies
FincoEnergies considers that this option be reserved only for the scenario of a company that has an emissions gap higher than 24% but can still make a Claim via following the Box 5 option (supported by FincoEnergies) elements 1 and 2. This option would fall under element 2 of Box 5. We suggest this course to encourage ambition to take full responsibility of the companys emission gap, while still being inclusive to those companies with a high emissions gap. Survey question feedback.	Option boxes	FincoEnergies
While FincoEnergies agrees with this statement, it is with the proviso that the 24% participation guardrail be amended as per the option in Box 5 - that is a company with a larger gap can still participate in the Scope 3 Claim framework as long as they adhere to the 2 'elements listed in Box 5. So amended, we consider the Scope 3 Claim would encourage ambition to take full responsibility of the companys emission gap, while still being inclusive to those companies with a high emissions gap.	Option boxes	FincoEnergies
No comment other than to repeat FincoEnergies position that the 24% should not be used as a barrier to participation in the Scope 3 Claim framework. Instead we suggest that VCMI retains the 24% solely as a cap on credit usage (as per the option in Box 5), and not as a participation barrier to its Scope 3 Claim framework.	Option boxes	FincoEnergies
Companies that have a higher the emissions gap are not allowed to make a scope 3 claim. This approach does not provide an incentive for such a company to align with the target. Companies should be allowed to make Scope 3 Claim regardless of the gap threshold. Most notably, companies should be allowed to make Scope 3 Claim regardless of the gap threshold.	Option boxes	Anew Climate
I don't agree with company B in the example not being able to make any claim, not even for the 21.6 which represents 24% of the emissions gap. For company A, the emissions gap (20 tCO2e) is lower than the limit of 24% (21.6 tCO2e), thus the company can make a Scope 3 Claim. Company B`s emissions gap, however, exceeds the limit of 24% of trajectory emissions included in the target boundary (30 > 21.6), so the company is able to make a Scope 3 Claim for the 24% gap only.	Option boxes	Mundys
It seems that higher the emissions gap less possible it is to make a scope 3 claim. This approach does not seems to provide an incentive to align with the target. Companies shall be allowed to make Scope 3 Claim regardless of the gap threshold. Companies shall be allowed to make Scope 3 Claim regardless of the gap threshold.	Step 3: Meet the required carbon credit use and	IETA

Comments (compiled)	Section of the Claim	Respondent name/ organisation
	quality thresholds	
Box 5: Option to be considered "2. investment in measures to overcome remaining scope 3 barriers, which in turn will reduce future emissions, for the portion that exceeds the limit of the carbon credits use."□: The minimum acceptable dimension for these measures should be clearly defined, to avoid the risk of this clause being abusively used by companies that fail to meet their targets.	Option boxes	Carbonext

21 Option box 6 – Carbon budget approach

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Pertaining to the calculation method of the emissions gap, we wish to highlight our preference for option 1. Option 2 poses a disincentivisation from corporate action generally, as the longer timeline could dissuade those making the claim from full transparency in their actions and could be considered a handout for continued emission.	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous
In terms of the calculation approach, we prefer the second carbon budget approach, as it locks a company into a limited carbon budget (e.g. limited total cumulative emissions) between their base year and 2038 (or more ambitious target year). As noted in Box 6, this is also a simpler approach. We also note that the global north has overused and unequally used the global carbon budget, and that this should be acknowledged when using a carbon budgeting approach and framework	Option boxes	Libby Blanchard
This leaves too much room for abuse, companies can 'overexceed' targets in the near term then quit the guidance later. It also adds an unnecessary layer of complexity.	Option boxes	Anonymous
We disagree with the carbon budget.This leaves too much room for abuse, companies can 'overexceed' targets in the near term then quit the guidance later. It also adds an unnecessary layer of complexity. Not to go ahead with this box.	Option boxes	Anonymous
A carbon budget provides a structured framework that helps companies understand and stay within their allowable emissions. None	Option boxes	Invert
A 40% limit should be sufficient to prevent companies from front-loading carbon credit use, especially at the beginning of the target period while also providing companies flexilibity in ramping up their scope 3 reduction initiatives.	Option boxes	Invert

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The VCMIs provisions for companies emissions trajectories, based on the use of a carbon budget approach, would risk distracting from and delaying short term action, by allowing companies to continue increasing their emissions in the short-term. Figure 2 of our briefing illustrates an example of a company with a target to reduce its scope 3 emissions by 50% between 2025 and 2035. Due to the 24% flexibility allowance in addition to VCMIs provision for companies to chart a non-linear pathway towards their targets, this company would be able to steadily increase its emissions for the first half of the target period up to 2030 while still qualifying for the VCMI Scope 3 Flexibility Claim. The VCMIs carbon budget approach would eventually require companies to reduce emissions over the latter half of the target period. However, companies could simply abandon or backslide on its targets at this point, after benefitting from the flexibility for years. This could potentially allow the company to use the Scope 3 Flexibility Claim to distract from and delay meaningful climate action. Short-term flexibility for corporations would delay necessary transitions and distract from their lack of progress""a fundamentally wrong approach to addressing the climate crisis. Companies must take immediate action to drastically reduce emissions within their value chains while developing long-term strategies for transitioning to net zero. We cannot afford any periods of inaction if we are to meet the goals of the Paris Agreement The VCMIs provisions for companies emissions trajectories, based on the use of a carbon budget approach, would risk distracting from and delaying short term action, by allowing companies to continue increasing their emissions in the short-term. Figure 2 of our briefing illustrates an example of a company with a target to reduce its scope 3 emissions by 50% between 2025 and 2035. Due to the 24% flexibility allowance in addition to VCMIs provision for companies to chart a non-linear pathway towards their targets, this company would be able to steadily increase its emissions for the first half of the target period up to 2030 while still qualifying for the VCMI Scope 3 Flexibility Claim. The VCMIs carbon budget approach would eventually require companies to reduce emissions over the latter half of the target period. However, companies could simply abandon or backslide on its targets at this point, after benefitting from the flexibility for years. This could potentially allow the company to use the Scope 3 Flexibility Claim to distract from and delay meaningful climate action. Short-term flexibility for corporations would delay necessary transitions and distract from their lack of progress""a fundamentally wrong approach to addressing the climate crisis. Companies must take immediate action to drastically reduce emissions within their value chains while developing long-term strategies for transitioning to net zero. We cannot afford any periods of inaction if we are to meet the goals of the Paris Agreement	Option boxes	NewClimate Institute
It can but this will depend on how stringent the reporting and verification is as well as how good the data is that is used to baseline.	Option boxes	AHDB
The limit of 40% was not clear of easy to follow.	Option boxes	AHDB
Using the concept of a carbon budget increases the flexibility of companies' efforts to reduce emissions. No comments	Option boxes	TOKYO GAS CO.,LTD.
If there was a more clear explanation of the 40% limit on Scope 3 emissions budgets, it would help various stakeholders to better understand the concept.	Option boxes	TOKYO GAS CO.,LTD.

Comments (compiled)	Section of the Claim	Respondent name/ organisation
In the interest of promoting inclusion and providing flexibility to companies to cater for their unique circumstances, FincoEnergies supports the addition of this option as well as the standard method. Doing so further supports uptake and thus impact of the Scope 3 Claim framework.	Option boxes	FincoEnergies
While the methodology differs, the outcome is still science-aligned. Survey question submission.	Option boxes	FincoEnergies
FincoEnergies agrees with the rationale provided in Box 6 on this topic. Survey question submission.	Option boxes	FincoEnergies
The VCMIs carbon budget approach risks distracting companies from and delaying short term action. As it allows companies to continue increasing emissions in the short term and eventually reduce their emissions over the latter half of the target period. Moreover, there is no guarantee that companies will keep and not abandon their target at this point. Emission reduction is an absolute necessity and cannot be delayed, VCMIs approach risk doing this.	Option boxes	ECOS
No percentage	Option boxes	ECOS
We urge VCMI to reconsider the proposal in this paper, as it risks the reputation and credibility of VCMI and a company that decides to use it.	Option boxes	ECOS
We do not see the rationale to prevent companies using carbon credits in the first years of the implementation period. Companies should be provided with flexibility to ramp up their scope 3 reduction initiatives, and if they choose to use them all in early years, due to investments being made now that will reduce the gap in future years, they should be allowed to do so. From a time-value-of-carbon perspective (e.g. 100 tons reduced today is more valuable to mitigating climate change than 100 tons reduced in 2030), companies making investments TODAY in either Scope 3 or carbon credits should be prioritized. Guardrails should be implemented to ensure the use of high quality carbon credits, but not to limit the ability of companies to use credits to abate their scope 3 emissions. n/a please see comments above Remove the arbitrary 40% guardrail.	Option boxes	Anew Climate
The concept is rational and straightforward. A carbon budget provides a structured framework that helps companies understand and stay within their allowable emissions over time. By establishing a linear trajectory for emissions and a budget below the line, the approach simplifies calculations for companies, making it easier to understand and implement. n/a please see comments above	Option boxes	Anew Climate
The concept is rational and straightforward. A carbon budget provides a structured framework that helps companies understand and stay within their allowable emissions over time. By establishing a linear trajectory for emissions and a budget below the line, the approach simplifies calculations for companies, making it easier to understand and implement.	Option boxes	Rubicon Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
We do not see the rationale to prevent companies using carbon credits in the first years of the implementation period. Companies should be provided with flexibility to ramp up their scope 3 reduction initiatives, and if they choose to use them all in early years, due to investments being made now that will reduce the gap in future years, they should be allowed to do so. From a time-value-of-carbon perspective (e.g. 100 tons reduced today is more valuable to mitigating climate change than 100 tons reduced in 2030), companies making investments TODAY in either Scope 3 or carbon credits should be prioritized. Guardrails should be implemented to ensure the use of high quality carbon credits, but not to limit the ability of companies to use credits to abate their scope 3 emissions. Remove the arbitrary 40% guardrail	Option boxes	Rubicon Carbon
A companies' Scope 3 gap will likely vary year-to-year for reasons beyond their control. Forcing them to decrease their gap every year, as the current method suggests, is unrealistic. Nontheless, to prevent a company from using a substantial proportion of its budget early on and then dropping the claim in later years, the 40% limit should be reduced. See next column for more information. The 40% budget limit would allow companies to cover all of their yearly emission gaps for the first few years without any meaningful internal decarbonization. To better limit companies from using a substantial part of the budget early on, the 40% limit should be reduced significantly, ideally to a scientifically derived limit instead of an arbitary number.	Option boxes	The Nature Conservancy
If the user is able to access reliable numbers to inform this approach then this could be acceptable. The goal should be to simplify the process wherever possible to encourage user uptake. As above	Option boxes	Accela Research
Once again, these arbitrary thresholds are a result of working with a broken measurement system. Fix the measurement system, and the thresholds become unnecessary. Please see our responses above. We recommend that the document be wholly revised based on our earlier comments.	Option boxes	E-liability Institute
Budgets are indeed essential to managing decarbonization consistent with geological net zero. But these budgets cannot be set top-down in a free society. Unless the VCMI is advocating that the United States and other Western market societies adopt Soviet-style central planning, we suggest that it keep its focus on developing rigorous carbon measurement and leave the question of budgeting to governments and the people. Please see our responses above. We recommend that the document be wholly revised based on our earlier comments.	Option boxes	E-liability Institute
This approach is a straightforward and understandable concept. Introducing an arbitrary limit as a guardrail of 40% could again reduce action being taken by companies. If an annual limit is deemed necessary, an alternative method could be to apply the annual (e.g. 24%) limit, however in any year whereby the gap is lower than 24%, this contributes to a 'pool which can be drawn down upon in future years to allow for fluctuations in performance against target. This would also prevent companies being able to benefit from the application of very high use of carbon credits in early years, and also accounts for the fact that reductions are more likely to be achievable earlier on in the reduction trajectory	Option boxes	Climate Impact Partners

Comments (compiled)	Section of the Claim	Respondent name/ organisation
as the quick wins or higher impact reductions can be realized. This method would establish the same alignment to 'overall carbon budget as described here, but ensure that there is the need or incentive to deliver stronger reductions early on. No further comments		
Whilst it ensures a credible science based approach, unsure whether it simplifies the process. None. None.	Option boxes	Sopra Steria Group
Under the current proposal, a budget is already implicitly included, since there is a provision to cap cumulative emissions at the level of the emissions which would have resulted under a linear trajectory.	Option boxes	Carbon Market Watch
The limit reduces but does not fully eliminate the risk of companies using up their budget in the early years and stopping making scope 3 claims if their budget runs out before the trajectory period (i.e. before the near-term target year). This risk is acceptable and inevitable, in our view, and we see this claim as a voluntary and exploratory claim that applies a learning-by-doing approach. Transparency is key, allowing e.g. stakeholders to observe if a company stops making scope 3 claims due to using up its budget before eliminating its gap. No further comments.	Option boxes	Perspectives Climate Research
TECHNICAL · A carbon budget could be a desirable option to improve flexibility of delivery. However, insofar as we understand the proposal, it appears only to allow an increase in the annual cap by taking from other years in the period, rather than allowing for distribution of emissions fully across the budget period. Tying to the claim year without 'carry over or 'future borrowing effectively makes it comparable to annual trajectories, just with a more flexible headroom for purchasing credits. We recommend additional consideration for carbon budget mechanisms for applying additional flexibility across years. There are two alternative options where carbon budgets could be more broadly implemented with the claim framework: 1. Over-delivery and carry over of budget is allowed: if over-delivery against the Scope 3 trajectory is delivered one year, it will allow full carry over to subsequent years. E.g. if in 2021, Company A overdelivers against its Scope 3 targets by 5ktCO2, and in 2022 it underdelivers by 10ktCO2, then 5ktCO2 from 2021 can be used for 2022, with only an additional 5ktCO2 requiring counterbalancing, not the full annual 10ktCO2. 2. Over-delivery and under-delivery is allowed, with reconciliation at the end of the budget period. Option 1 applies, as well as the ability to rely on future periods within the budget to compensate for the current period, where over-delivery against future periods is expected, strong guardrails would be needed to ensure it is not used as a stalling tactic and so that it doesnt create market issues e.g. creating a rush for credits at the end of the budget period.	Option boxes	Drax

Comments (compiled)	Section of the Claim	Respondent name/ organisation
REPUTATIONAL AND TECHNICAL · Re-baselining should also be considered as part of the calculations. E.g. if re-baselining affects prior periods, such that insufficient credits were purchased to compensate for the gap, are more credits needed to be purchased to validate historical claims? Or will the claim avoid any potential historical revisions to baselines?	Option boxes	Drax
The concept sounds rational and straightforward. A carbon budget provides a structured framework that helps companies understand and stay within their allowable emissions. Please clarify risks and consequences of applying this approach.	Option boxes	IETA
We do not see the rationale to prevent companies using carbon credits in the first years of the implementation period. From a time-value-of-carbon perspective (e.g. 100 tons reduced today is more valuable to mitigating climate change than 100 tons reduced in 2030), companies making investments TODAY in either Scope 3 or carbon credits should be prioritized. Guardrails should be implemented to ensure the use of high quality carbon credits, but not to limit the ability of companies to use credits to abate their scope 3 emissions. Please clarify risks and consequences of applying this approach. Remove the 40% guardrail.	Option boxes	IETA
The claim should not be prescriptive on how companies wish to participate. The claim must promote disclosure of emissions, use of credits and drive adoption or claims and reporting.	Option boxes	Carbonplace
In the early years of companies making claims, we should enable and promote the use of credits. This drives internal financial commitment to NetZero and promotes global emission reductions. If use of credits for 100% of scope 3 emissions is permitted this sets a benchmark for contributing to 100% of emissions in each year through reductions and investment. With good, standardised disclosures, stakeholders in the supply chain will drive the requirement to decarbonise overtime. Thus, in subsequent years of the claim a company will disclose a decreasing use of credits and an increase in decarbonisation.	Option boxes	Carbonplace
Carbon budget can be averaged yearly based on an integrated linear pathway from baseline year to interim target year. Having a nonlinear carbon budget can also more accurately reflect expected uncertainties and evolutions in time, such as anticipated technology breakthroughs. The greater the granularity of the emissions target in time the better the chances to course correct for any deviations on time. See comment above. Scope 3 Claim b) comment and above.	Option boxes	Center for Climate and Energy Solutions
The 40% limit (p.26) seems a little arbitrary. The guidance would have to offer a more thorough explanation about it, in order to keep it as guardrail. Also, in line with comment in Box , b), above, retiring high quality carbon credits beyond the 24% maximum scope 3 gap is desirable but could be the object of separate language and even be treated as progress toward a separate climate goal altogether, and not necessarily be part of a so called Scope 3 Claim, to avoid potential negative perception (See initial comment in "Scope 3 claim, b)). This potential negative perception does not happen with higher level claims, where companies meet the net zero pathway across	Option boxes	Center for Climate and Energy Solutions

Comments (compiled)	Section of the Claim	Respondent name/ organisation
scopes, and are rewarded as they do more by using beyond value chain credits.. See comment above. Scope 3 Claim b) comment and above.		
There are many different carbon budgets that are climate science and modeling based. However, the use of the carbon budget concept, although its simplifies the claim calculation does not ensure that the Scope 3 Claim is science based, since many factors in calculation depend of factors, such as the degree of auditing assurance applied to Scope 3 absolute emission reporting, that are not science-based.	Option boxes	Institute for Agriculture and Trade Policy
The calculation of a carbon budget is based on physical science and computer modeling assumptions and choices. The calculation of a carbon credit budget is based on policy scenarios, computer modeling choices and econometric outputs. Because there are so few high quality credits to buy and because the decision to retire those credits will be based primarily on rate of return on investment analysis and only secondarily on compliance with the terms of the Scope 3 Claim, buyers of high quality credits are most likely to retire those credits near and/or at the end of the net zero target commitment period. If the commitment period is 10 years, the 40% limit may suffice because companies will have more time to buy and retire credits. For companies that make five year commitments, the limit should be lowered to give companies less opportunity to retire most of their credits in the last year of the commitment. The percentage limit for the retirement of high quality credits in a specific year will depend on the number of years in a company's net zero target commitment.	Option boxes	Institute for Agriculture and Trade Policy
The multi-year consideration this entails could make it more complicated and increase the perceived risk of companies to participate. It also would give more flexibility to companies that are further from their target date than others (if you only have 2 years left until your target you have less budget flexibility than if you have 8 years left, even though	Option boxes	Conservation International
Difficult to judge without information on the portion of companies this higher threshold would exclude/include.	Option boxes	Conservation International
A cumulative under the curve approach is better because it allows flexibility over time and does not dictate a time specific answer. While method ensures that the company is committing to an equal cumulative reduction target under both methods, companies shall set the emission trajectory that better reflects their decarbonization strategy. None None	Option boxes	IETA
Box 6: Option to be considered In 'Figure 7: Scope 3 emissions budget calculation,' it is unclear how the relationship/conversion between 'emissions' and 'budget' is made. These details should be included in a Glossary at the beginning of the document, as the lack of detail significantly hinders the understanding of these concepts.	Option boxes	Carbonext
VCMI's Budget approach will be effective in providing flexibility to companies' fluctuations in emissions	Option boxes	The Nature Conservancy

Comments (compiled)	Section of the Claim	Respondent name/ organisation
it must lower the 40% yearly limit to ensure that companies do not abuse their budgets in early years.	Option boxes	The Nature Conservancy
Although the carbon budget requirements would require the company to reduce emissions between 2030 and 2035, companies could backslide on their targets having already benefitted from VCMI's validation of their 'climate action' for five years. Thus, the flexibility claim can can enable companies to distract from and delay meaningful action on climate in the next crucial years.	Option boxes	Anonymous
We consider that the VCMIs proposed Scope 3 Claim is potentially misleading. The nuances of the Scope 3 claim methodology particularly related to the emissions trajectory and carbon budget methodology significantly affect the transparency and integrity of the proposal. The VCMIs provisions for companies emissions trajectories, based on the use of a carbon budget approach, would risk distracting from and delaying short term action, by allowing companies to continue increasing their emissions in the short-term. Figure 2 of our briefing illustrates an example of a company with a target to reduce its scope 3 emissions by 50% between 2025 and 2035. Due to the 24% flexibility allowance in addition to VCMIs provision for companies to chart a non-linear pathway towards their targets, this company would be able to steadily increase its emissions for the first half of the target period up to 2030 while still qualifying for the VCMI Scope 3 Flexibility Claim. The VCMIs carbon budget approach would eventually require companies to reduce emissions over the latter half of the target period. However, companies could simply abandon or backslide on its targets at this point, after benefitting from the flexibility for years. This could potentially allow the company to use the Scope 3 Flexibility Claim to distract from and delay meaningful climate action. Short-term flexibility for corporations would delay necessary transitions and distract from their lack of progress - a fundamentally wrong approach to addressing the climate crisis. Companies must take immediate action to drastically reduce emissions within their value chains while developing long-term strategies for transitioning to net zero. We cannot afford any periods of inaction if we are to meet the goals of the Paris Agreement.	Option boxes	NewClimate Institute
The VCMIs provisions for companies emissions trajectories, based on the use of a carbon budget approach, would risk distracting from and delaying short term action, by allowing companies to continue increasing their emissions in the short-term. Figure 2 of our briefing illustrates an example of a company with a target to reduce its scope 3 emissions by 50% between 2025 and 2035. Due to the 24% flexibility allowance in addition to VCMIs provision for companies to chart a non-linear pathway towards their targets, this company would be able to steadily increase its emissions for the first half of the target period up to 2030 while still qualifying for the VCMI Scope 3 Flexibility Claim. The VCMIs carbon budget approach would eventually require companies to reduce emissions over the latter half of the target period. However, companies could simply abandon or backslide on its targets at this point, after benefitting from the flexibility for years. This could potentially allow the company to use the Scope 3 Flexibility Claim to distract from and delay meaningful climate action. Short-term flexibility for corporations would delay necessary transitions and distract from their lack of progress""a fundamentally wrong approach to addressing the climate crisis. Companies must take immediate action to drastically reduce emissions within their value chains while	Option boxes	NewClimate Institute

Comments (compiled)	Section of the Claim	Respondent name/ organisation
developing long-term strategies for transitioning to net zero. We cannot afford any periods of inaction if we are to meet the goals of the Paris Agreement.		
While the calculation of the emissions gap and trajectory seem like they would be quite complicated, the equation to calculate trajectory emissions is quite clear. Nonetheless, as VCMI notes, not all emissions reductions trajectories will be linear, so we encourage VCMI to consider providing more guidance and/or greater flexibility for companies selecting a non-linear trajectory. For example, using a rolling average over a five year period would provide greater flexibility than an annual check, due to non-linear trajectories, as would the cumulative carbon budget concept contemplated.	Option boxes	Anew Climate

22 Other/ general

Comments (compiled)	Section of the Claim	Respondent name/ organisation
RE: Voluntary Carbon Market Integrity Initiative Beta Scope 3 Claim Consultation The American Petroleum Institute (API) appreciates the opportunity to comment on the Voluntary Carbon Market Integrity Initiative (VCMI) Beta Scope 3 Claim. API represents all segments of America's oil and natural gas industry. Its approximately 600 members produce, process, and distribute the majority of the nation's energy. API and its members are committed to delivering solutions that reduce greenhouse gas (GHG) emissions while meeting society's growing energy needs. To that end, we have laid out a Climate Action Framework that presents actions we are taking to accelerate technology and innovation, further mitigate GHG emissions from operations, advance cleaner fuels, drive comparable and reliable climate reporting, and endorse a carbon pricing policy. API recognizes the role of high-integrity voluntary carbon markets (VCMs) in meeting climate goals and appreciates VCMI's aim of supporting the development of a credible, high-integrity market. Oil and natural gas companies are actively using the VCM to implement their corporate climate strategies, including by investing in GHG mitigation projects and channeling finance into scaling low-carbon technologies. As such, API supports market initiatives that meaningfully contribute to the scaling of high-integrity, inclusive VCMs that increase trust in the markets and acceptance for the use of carbon credits as one component of a company's broader climate strategy. Furthermore, API and its members recognize the many challenges of setting and progressing towards scope 3 emissions targets and the potential of carbon credits to provide one pathway to meet scope 3 emissions goals. We are supportive of VCMI's aim to continue driving climate action while recognizing the limitations created by these barriers. We provide the below high-level comments on the Beta Scope 3 Claim.	General	American Petroleum Institute
-	General	Anonymous
In the absence of regulatory requirements mandating corporate action on decarbonisation across scopes, voluntary standards like VCMI are critical to maintaining the momentum in climate action seen in recent years. Balancing ambitious target setting and high-quality standards with a pragmatic approach to implementation is critical to keeping corporate participation high and engaged. With many companies increasingly expressing frustration or concern with their ability to meet targets - particularly regarding Scope 3 emissions - granting companies greater flexibility in how they pursue their decarbonisation pathway, accompanied by sensible and sufficient guardrails to ensure no backsliding or decreased ambition, will help keep early corporate adopters in the game. VCMIs scientifically grounded and deeply considered approach strikes a good balance between pragmatism and environmental rigour and will encourage wider corporate engagement and investment in decarbonisation from the ground up.	General	Anonymous

Comments (compiled)	Section of the Claim	Respondent name/ organisation
API reiterates the importance of allowing companies to use high-integrity carbon credits to meet their climate targets across all scopes of emissions. High-integrity carbon credits provide a cost-effective tool that companies can use to contribute to the global GHG emissions reductions needed to meet international climate goals. API supports the mitigation hierarchy1 and recognizes that carbon credits provide acritical tool for progressing towards climate targets when complemented by efforts to reduce a company's direct GHG emissions. However, API recognizes that in some instances where direct GHG emissions reductions are not feasible to implement due to technological and/or financial barriers, high-integrity carbon credits may provide a better tool for reducing those direct GHG emissions to meet GHG reduction targets. Arbitrarily limiting companies' ability to use carbon credits in meeting climate goals reduces optionality, decreases affordability, and limits the incentive for investment in international GHG mitigation projects and low-carbon technology deployment. As such, API recommends that VCMI allow for high-integrity carbon credits to be used to meet climate targets for all GHG emissions, as a complement to internal GHG emissions reduction efforts. API appreciates VCMI providing companies with the option to use carbon credits to make the Scope 3 Claim and urges VCMI to continue considering the role high-integrity carbon credits can play in meeting climate targets across all scopes of emissions. References: The mitigation hierarchy is a framework that provides a systematic approach to addressing and reducing environmental impacts, such as GHG emissions. It consists of three components: Avoid, Reduce, and Compensate, Per the mitigation hierarchy, companies should prioritize direct emissions reductions when reasonable to implement. In cases where direct emissions reductions are not reasonable to implement (for example, due to technological considerations or cost-effectiveness limitations) companies should utilize high-integrity carbon credits to compensate for emissions. 2 Research commissioned to inform the development of the Beta Scope 3 claim identified the following challenges: decarbonization cost, engaging the supply chain, data limitations, organizational capacity, market timing, availability of renewable energy, lack of information around strategies to reduce scope 3 emissions, broader macro issues (e.g. COVID-19, regional conflict), inflexibility or lack of clarity on target setting and/or disclosure frameworks, lack of access to financing (e.g. lack of external incentives or funding) and governance limitations (e.g. lack of decision making structures),	General	American Petroleum Institute
Establishing and progressing towards scope 3 targets represents a significant challenge for many companies given the complexity of scope 3 emissions. API appreciates VCMI's recognition of the significant and genuine challenges2 associated with setting and meeting scope 3 emissions targets and their aim to provide increased flexibility to meet such targets. Due to these challenges, scope 3 emissions are incredibly complex to calculate, and companies are very limited in their ability to directly reduce scope 3 emissions. Scope 3 emissions are outside of a company's ownership, control and oversight, making scope 3 targets especially difficult to establish and achieve. The target-setting company has a very limited ability to directly implement measures to reduce scope 3 emissions. In the oil and natural gas industry, scope 3 emissions represent the majority of the sector's value chain emissions. However, these GHG emissions are controlled by other entities, providing limited pathways for companies to reduce scope 3 emissions in line with any established targets. Companies are similarly unable to influence the decisions of consumers and their generation of downstream GHG emissions.	General	American Petroleum Institute

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Many stakeholders along a company's value chain may lack the resources or expertise to carry out the significant data collection efforts needed to calculate and set targets for scope 3 emissions. Scope 3 emissions are those along a company's value chain but from sources outside of their ownership and control, generated by the operations of their suppliers and consumers. As acknowledged by VCMI, collecting the data necessary to understand scope 3 emissions and establish precise, workable targets to reduce them can be extremely challenging. To inventory scope 3 emissions and establish targets, companies are reliant on other parties along their value chain to collect and supply data on their scope 1 emissions. Data collection and GHG emissions calculation and reporting efforts can create a significant burden for these companies. As such, companies along the value chain vary in their resources and ability to collect and report such data, limiting the reporting company's ability to provide a complete and precise calculation of scope 3 emissions.		
Scope 3 calculation methodologies may limit a company's ability to account for emissions reductions efforts implemented across a company's value chain. Methodologies for calculating scope 3 emissions often yield less precise data compared to scope 1 and scope 2 emissions. Considering the data collection challenges discussed above, scope 3 calculations are often based on benchmark data rather than product emissions data obtained directly from suppliers. The benchmark factors used to develop the reporting company's scope 3 emissions inventory do not reflect emissions reductions efforts of individual suppliers across their value chain. As such, these emission reductions efforts would not be reflected in measuring the reporting organization's progress towards a scope 3 emissions target.	General	American Petroleum Institute
Why not publishing guidance on what companies can do to achieve their scope 3 targets? (insetting projects solo financed or co-financed, traceability improvement, supply shed approach, etc.)	General	Marine Klobut
As with the first credits to receive the Core Carbon Principles (CCP)-approved label that have been found to likely not represent additional emissions reductions (Badgley and Chay 2024), CORSIA eligible credits have likewise been found to have integrity problems. One major problem is that CORSIA credits include jurisdictional REDD+ credits. West et al (2023) and others have shown that most REDD+ projects are less beneficial than often claimed and have not reduced deforestation significantly, and those that did had benefits substantially lower than claimed. References: G. Badgley, F. Chay, The first offset credits approved by a major integrity program dont make the grade. CarbonPlan, (2024). https://carbonplan.org/research/icvcm-landfill-additionality B. K. Haya, Alford-Jones, K., Anderegg, W. R. L., Beymer-Farris, B., Blanchard, L., Bomfim, B., Chin, D., Evans, S., Hogan, M., Holm, J. A., McAfee, K., So, I. S., West, T. A. P., & Withey, L. (2023). Quality assessment of REDD+ carbon credit projects. Berkeley Carbon Trading Project. https://gspp.berkeley.edu/research-and-impact/centers/cepp/projects/berkeley-carbon-trading-project/REDD+	General	Libby Blanchard

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T. A. P. West, Wunder, S., Sills, E. O., BÃ¶rner, J., Rifai, S. W., Neidermeier, A. N., Frey, G. P., & Kontoleon, A. Action needed to make carbon offsets from forest conservation work for climate change mitigation. Science (2023). https://doi.org/10.1126/science.ade3535		
I think some parts can be improved and clarified, but overall I am quite convinced that it goes into the right direction, providing a bit of flexibility while driving climate investments and remaining credible enough for companies to in the end meet their climate targets.	General	Marine Klobut
This is intended as a general comment and to be anonymous on the scope 3 claim, the issues go beyond the control of VCMI and relate to discussions started under SBTi Net Zero Standard revision and the GHG Protocol and the responsibility for scope 3 emissions but are connected to our desire to make a VCMI claim as for any claim we would want to maintain and ideally improve over time. As of today for near term targets we are on track to deliver on scope 3 reductions however the feasibility to continue to our SBTi targets on 90% reduction on scope 3 won't be fully under our control and this won't change. Without broader societal decarbonization we are likely to plateau in our scope 3 reduction achievements and therefore get further away from our targets. This scenario I believe affects many companies and is not an issue currently addressed in the scope 3 claim. To give some context in one area a large proportion of our emissions comes from commuting which as a company we have some levers to help reduce but getting down to the levels required in later years will include significant decarbonization of public transport around the world to meet the targets which we will have little direct control over and equally we would not have any control over where our staff choose to live. In these cases where all practical measures have been taken by a company to reduce emissions we would be happy to source carbon credits equivalent to the gap but currently we would not fall under any available claim.	General	Anonymous
Significant uptake by companies would accelerate progress towards net zero by ensuring more companies use high integrity climate credits. It could also drive significant near-term action. No further comments	General	Philip Brady
We think more consideration should be given to how this claim might be used by companies over time. If the claim is used on a one-off, short-term or intermittent basis, then money will flow to climate projects, but there would be a risk that, used in this way, the claim would dis-incentivise decarbonisation activities by companies, by diverting money from long-term investments in their value chains. The question of whether companies could use the claim once, over a short period, or intermittently, is not addressed sufficiently in the consultation document.	General	Claire Wigg
No.	General	Libby Blanchard
As a firm, we currently calculate our scope 3 emissions annually on a best efforts basis and adding a formal mechanism around this (option 1), would help ensure the validity of this process. We work across the household consumer chain and all the companies we work with find scope 3 the most daunting and challenging aspect to measure, so we would also work with them to implement this approach.	General	Anonymous

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Guardrails are required to ensure integrity, we agree on that point 1. Guardrail seems like it is designed to ensure companies are making a degree of progress against scope 3 (and not just defaulting to using credits as a cheaper option). We agree with this in theory There is logic/science behind both approaches, although this is quite complex to read and understand.	General	Philip Brady
As outlined in our previous responses, while we are sympathetic to the idea that companies can "net" their emissions liabilities using credible removal offsets, this objective can scarcely be accomplished using the Scope 3 framework and the existing definitions of carbon offsets, both of which are riddled with conceptual flaws. We recommend that the document be revised on the basis described in our answers above. We stand ready to advise on drafting standards should VCMI accept this transformative opportunity.	General	E-liability Institute
Specific comments have been added in the individual sections.	General	Carbon Market Watch
1. The Core methodology for the Claim 1.3 A Single, Standardized Format Currently, there is no universally mandated standardized format for companies to make Scope 3 claims, although several guidelines, frameworks, and best practices exist. Many companies follow recognized frameworks (CDP, GHG Protocol, SBTi, ISO Standards, VCMI CCP) but each one often interprets them differently, leading to inconsistencies in how Scope 3 emissions and carbon claims are reported, along with massive burden on corporations' resources. While frameworks like those mentioned above exist, none of them fully integrate all elements needed for a standardized process for making voluntary Scope 3 carbon claims, particularly the connection to carbon credit retirement and third-party validation. Each framework serves different aspects of corporate climate action but does not provide an end-to-end solution for making standardized, credible Scope 3 claims in a consistent format. A single, standardized format for Scope 3 claims is essential for ensuring consistency across companies in emissions calculations and carbon credit retirement, enabling comparability across industries and regions. It would enhance transparency and accountability, simplifying third-party validation and ensuring all companies adhere to the same rigorous standards. Technologies and platforms exist to support this. If there is a strong push from stakeholders and alignment with key frameworks like the SBTi, GHG Protocol, and ISO 14068, we may see a more formalized, standardized format emerge within the next few years. However, at present, companies tend to use a combination of these frameworks, leading to varied approaches.	General	Seagrass Ltd
Companies that are off track for scope 3 should not loose all incentive to continue. The use of credits twaords the scope 3 gap (as long as clearly communicated) provides an honest interim solution that encourages to keep going instead of abandoning targets. The use of carbon credits should be allowed (temporarily) for gaps in scope 3 emissions.	General	ClimatePartner

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As outlined in previous responses, we are seeking a more substantive approach to corporate decarbonization based on rigorous carbon accounting. Please see our earlier responses. As outlined in previous responses, we are seeking a more substantive approach to corporate decarbonization based on rigorous carbon accounting. Please see our earlier responses.	General	E-liability Institute
Please see our responses above. We recommend that the document be wholly revised based on our earlier comments.	General	E-liability Institute
No carbon credits should be used for Scope 3 emissions.	General	ECOS
While the gap can be filled by credits, the framework needs to ensure that investments in carbon credits do not displace potential investment in decarbonisation alternatives which will unlock longer term, sustainable emission reduction. As an example, BP has a target to reduce scope 3 production emission of 361 Mt (2019) by 30% by 2030. Offsetting 24% of these emissions (86 Mt) at an assumed credit cost of $20/tonne would cost $1.7 billion annually. An alternative investment to high quality carbon credits could be investment in 2 GW of solar which would longer term impacts on the emissions of BP's portfolio. As above	General	Accela Research
Once again, this sort of convoluted argumentation is necessitated by adopting a Scope 3 approach to carbon measurement. Fix the measurement system, and all one will need is a robustly audited E-ledger to manage and track decarbonization. Please see our responses above. We recommend that the document be wholly revised based on our earlier comments.	Step 3: Meet the required carbon credit use and quality thresholds	E-liability Institute
n/a	Step 3: Meet the required carbon credit use and quality thresholds	BeZero Carbon
Please see our responses above. We recommend that the document be wholly revised based on our earlier comments.	General	E-liability Institute
Overall, we believe that an approach requiring significant investment in reducing Scope 3 emissions (which are not managed by the organizations) may restrict investments in reducing their own emissions (Scopes 1 and 2). An alternative could be a model where the investment for reducing Scope 3 emissions is structured as a shared responsibility, allowing the cost of this investment to be transparently passed on to the end consumer. However, it is essential that this strategy be implemented in a sector-specific manner, with special attention to avoiding inflation in essential sectors such as food and housing.	General	Carbonext

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There is a lack of accessible methodologies (SBTi is too expensive) and clear frameworks that standardize the publication of action plans, timelines, expenditures, baseline year definition, and reductions.		
It is important to analyze and try to prevent the 'leakage' of emissions from Scope 1 to Scope 3, as we see this as one way to reduce direct emissions (by outsourcing carbon-intensive parts of the operation).	General	Carbonext
Duplicate response. Scope 3 Claim Scope 3 emissions do not have clearly defined boundaries and, if taken literally, can extend indefinitely due to the interdependent nature of materials and processes. Before any goal reductions, it is important to clarify the boundaries of Scope 3. The limits of Scope 3 emissions must be clearly defined through a specific and transparent protocol in order to avoid discrepancies in claims between players in the same sector with similar characteristics. Based on our experience with various companies, we understand that defining the extent of Scope 3 emissions remains a challenge. Since this initiative involves investments (investing in carbon credits in an amount that at least equals their entire Scope 3 emissions gap), a standardized definition of this scope becomes essential for the success of the initiative in a fair manner for all players. The definition of the 'companys Scope 3 emissions gap' (a central concept of the initiative) should be clearly outlined at the beginning of this document, as currently, the reader must search for this information in subsequent sections. It is advisable to include an initial Glossary with key terms to facilitate an understanding of the initiative's rules from the outset. There are other critical points in this discussion on reducing Scope 3 emissions: 1) Given that the entirety of Scope 3 represents the Scope 1 emissions of other companies, what incentive do these other companies have to reduce their own Scope 1? Wouldn't it be important to incentivize emission reduction initiatives in companies' Scopes 1 and 2 through the generation of credits? 2) As currently outlined, the initiative does not identify incentives for reducing a companys own or controlled emissions or for improving its energy efficiency (Scopes 1 and 2). On the contrary, the initiative imposes a double burden for reducing emissions that the company does not manage (i.e., investments to reduce Scope 3 emissions + purchasing credits to offset the Scope 3 gap). This seems to create barriers to investing in emission reductions in processes directly managed by companies (Scopes 1 and 2). 3) Since a given company may be part of the Scope 3 emissions of numerous other companies involved in this initiative, how can we prevent the emissions of that company from being compensated/invested in multiple times?	General	Carbonext

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4) In line with question 3 above, wouldnt an initiative focused on managing Scope 3 emissions risk companies (with the profile mentioned in question 3) becoming complacent and waiting for investments from other companies that depend on them to reduce their Scope 3 emissions? 5) If Company A, which is part of Company Bs Scope 3, manages to reduce its Scope 1 emissions (which form part of Company B's Scope 3 emissions) using its own resources, how can we ensure that Company B does not unjustly claim these reductions in Scope 3, presenting them as its own achievement (rather than the achievement of Company A)? In other words, there is a risk that Company B could maintain its claim without making any investment in its Scope 3 (due to the efforts of a single supplier who reduced its emissions), while other companies may have invested heavily in Scope 3 emission reductions but are unable to maintain their claim (since their gap exceeds 24%). Would this be considered fair? Box 2: Option to be considered The Four Steps to Making a Scope 3 Claim Step 1: Comply with the Foundational Criteria No comments. Step 2: Meet the Scope 3 Claim requirements "Publicly disclose the barrier(s) faced in reducing Scope 3 emissions"□: it is important to bear in mind that the greatest barrier to reducing Scope 3 emissions lies in the fact that these emissions are not administered or managed by the company making the disclosure. In other words, the company disclosing the information is directly responsible for managing and reducing emissions in its Scopes 1 and 2 but cannot directly control the Scope 1 and 2 emissions of the companies that make up its Scope 3. This is the biggest barrier. For this step to be effective, it is essential that the boundaries for measuring Scope 3 emissions are standardized. Otherwise, some organizations may reduce their emissions simply by excluding certain items from their calculations, thereby shrinking their measurement boundaries (due to a lack of clear rules on Scope 3 emission inclusions). Regarding the recommendation to disclose guidelines for the retirement of carbon credits by companies that wish and are able to offset Scope 3 emissions: we agree and see great potential to promote more credible carbon markets and reduce integrity risks that		

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undermine the market and affect the credibility of a market with the potential to combat the climate emergency. Box 3: Option to be considered "â… selection of the high-quality carbon credit they chose to retire to make a Scope 3 Claim and plan for investments that will contribute to remove barriers to decarbonization."□: Generally speaking, are we not demanding too much from a company that is unable to reduce its Scope 3 emissions by asking it to both invest in reducing Scope 3 emissions and purchase credits to offset its excess Scope 3 emissions? What if all the investment and effort were focused solely on reducing these emissions or solely on purchasing credits? It should be considered that: i) Scope 3 emissions are not under the control of the company making the claim, and ii) the company that is part of Scope 3 has likely already made investments and was unable to reduce its Scope 1 emissions (in other words, reducing these emissions is already a significant challenge, requiring substantial investment). Step 3: Meet the required carbon credit use and quality thresholds No comments. Apply Guardrails & Box 4 "The scope 3 emissions gap must not exceed 24% of a companys scope 3 trajectory emissions included in the target boundary in the year it is making the claim."□: What are the penalties for non-compliance with this condition? This should be clearly stated in this part of the document. What safeguards are included in the initiative to ensure that a company is not underestimating the potential rate of its Scope 3 emission reductions in order to remain compliant with the 24% rule? Calculations needed No comments. Establish a scope 3 Emissions Trajectory There is a possibility that some companies may choose not to maximize their forecast emission reduction efforts in order to maintain a significant amount of emissions in Scope 3 that they can offset without exceeding the 24% gap limit. This behavior might be driven by a		

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desire to avoid excessive pressure to quickly reduce internal emissions, as doing so could require substantial investments in new technologies or significant operational changes. In other words, the company may opt to set fewer compromises to reduce emissions now, keeping them within a comfortable margin in relation to the 24% gap limit. Calculate the scope 3 Emissions Gap No comments. Box 5: Option to be considered "2. investment in measures to overcome remaining scope 3 barriers, which in turn will reduce future emissions, for the portion that exceeds the limit of the carbon credits use."□: The minimum acceptable dimension for these measures should be clearly defined, to avoid the risk of this clause being abusively used by companies that fail to meet their targets. "As an additional recommendation, the selection of high-quality carbon credits retired to make the claim could be intentionally related - sectorally and/or geographically - to the sources of scope 3 emissions contained in the companys scope 3 emissions gap."□: We primarily disagree with the sectoral restriction, as it could become another bottleneck in an already complex market. Regarding the geographical restriction, we partly agree, as preventing institutions from accessing markets outside their geographical areas of operation could undermine one of the markets greatest potential benefits: channeling capital into emerging countries and developing sustainable sectors. We agree with the national geographical restriction when it benefits emerging economies. Examples of Scope 3 Claim Calculations No comments. Box 6: Option to be considered It is not clear whether this option and 'Box 5: Option to be considered' are mutually exclusive or complementary. In 'Figure 7: Scope 3 emissions budget calculation,' it is unclear how the relationship/conversion between 'emissions' and 'budget' is made. These details should be included in a Glossary at the beginning of the document, as the lack of detail significantly hinders the understanding of these concepts.		

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Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework We understand that the 'third-party assurance' process should involve both carbon quantification and matters related to budget allocation and other quantifications tied to corporate management. In this context, are there already defined audit protocols for conducting this 'third-party assurance'? Who will be responsible for verifying the quality of these audits for 'third-party assurance'? General Questions Overall, we believe that an approach requiring significant investment in reducing Scope 3 emissions (which are not managed by the organizations) may restrict investments in reducing their own emissions (Scopes 1 and 2). An alternative could be a model where the investment for reducing Scope 3 emissions is structured as a shared responsibility, allowing the cost of this investment to be transparently passed on to the end consumer. However, it is essential that this strategy be implemented in a sector-specific manner, with special attention to avoiding inflation in essential sectors such as food and housing. There is a lack of accessible methodologies (SBTi is too expensive) and clear frameworks that standardize the publication of action plans, timelines, expenditures, baseline year definition, and reductions. It is unclear whether companies emitting more than 24% will be required to offset and still have their claims rejected, or whether compensation is mandatory at all, or if the risk is purely reputational. It is important to analyze and try to prevent the 'leakage' of emissions from Scope 1 to Scope 3, as we see this as one way to reduce direct emissions (by outsourcing carbon-intensive parts of the operation).		
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There are other critical points in this discussion on reducing Scope 3 emissions: 1) Given that the entirety of Scope 3 represents the Scope 1 emissions of other companies, what incentive do these other companies	General	Carbonext

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now, keeping them within a comfortable margin in relation to the 24% gap limit. Calculate the scope 3 Emissions Gap No comments. Box 5: Option to be considered "2. investment in measures to overcome remaining scope 3 barriers, which in turn will reduce future emissions, for the portion that exceeds the limit of the carbon credits use."□: The minimum acceptable dimension for these measures should be clearly defined, to avoid the risk of this clause being abusively used by companies that fail to meet their targets. "As an additional recommendation, the selection of high-quality carbon credits retired to make the claim could be intentionally related - sectorally and/or geographically - to the sources of scope 3 emissions contained in the companys scope 3 emissions gap."□: We primarily disagree with the sectoral restriction, as it could become another bottleneck in an already complex market. Regarding the geographical restriction, we partly agree, as preventing institutions from accessing markets outside their geographical areas of operation could undermine one of the markets greatest potential benefits: channeling capital into emerging countries and developing sustainable sectors. We agree with the national geographical restriction when it benefits emerging economies. Examples of Scope 3 Claim Calculations No comments. Box 6: Option to be considered It is not clear whether this option and 'Box 5: Option to be considered' are mutually exclusive or complementary. In 'Figure 7: Scope 3 emissions budget calculation,' it is unclear how the relationship/conversion between 'emissions' and 'budget' is made. These details should be included in a Glossary at the beginning of the document, as the lack of detail significantly hinders the understanding of these concepts. Step 4: Obtain third-party assurance following the VCMI monitoring, reporting & assurance (MRA) framework		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
We understand that the 'third-party assurance' process should involve both carbon quantification and matters related to budget allocation and other quantifications tied to corporate management. In this context, are there already defined audit protocols for conducting this 'third-party assurance'? Who will be responsible for verifying the quality of these audits for 'third-party assurance'? General Questions Overall, we believe that an approach requiring significant investment in reducing Scope 3 emissions (which are not managed by the organizations) may restrict investments in reducing their own emissions (Scopes 1 and 2). An alternative could be a model where the investment for reducing Scope 3 emissions is structured as a shared responsibility, allowing the cost of this investment to be transparently passed on to the end consumer. However, it is essential that this strategy be implemented in a sector-specific manner, with special attention to avoiding inflation in essential sectors such as food and housing. There is a lack of accessible methodologies (SBTi is too expensive) and clear frameworks that standardize the publication of action plans, timelines, expenditures, baseline year definition, and reductions. It is unclear whether companies emitting more than 24% will be required to offset and still have their claims rejected, or whether compensation is mandatory at all, or if the risk is purely reputational. It is important to analyze and try to prevent the 'leakage' of emissions from Scope 1 to Scope 3, as we see this as one way to reduce direct emissions (by outsourcing carbon-intensive parts of the operation).		
The Negative Emissions Platform welcomes VCMIs consultation on its Scope 3 beta claim and supports its objective of helping businesses to tackle Scope 3 emissions they are yet to abate. However, NEP believes the guidance should also play a more proactive role in supporting the delivery of net-zero targets by encouraging much-needed investment in carbon dioxide removal. The State of Carbon Dioxide Removal (2nd edition) publication[1] reports that approximately 7-9GT of carbon dioxide removal (CDR) will be required per year by mid-century to meet Paris-aligned scenarios. However, there is currently an identified CDR gap for those most sustainable pathways of 0.9-2.8 GtCO2 per year in 2030 and 0.4-5.4 GtCO2 per year in 2050. It is therefore well established that removals technologies are needed at gigatonne scale by mid-century to achieve net zero CO2 and address (limited) overshoot emissions thereafter by realising a net-negative CO2 emission balance. It is well understood by the scientific community that the ramp-up in permanent removals needs to start today, and therefore standards incentivising the use of carbon credits should reflect this in their framework[2]. VCMIs Scope 3 claim can help catalyse present day removals technologies by linking their deployment to corporate decarbonisation through high integrity carbon credits. Voluntary carbon markets have the potential to be a significant lever in scaling the deployment of carbon removal technologies. Critical to the success of such markets will be sufficient demand backed by clear guidance and incentives for participating corporates.	General	Negative Emissions Platform

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Allowing corporates to meet a portion of their science-based Scope 3 emissions reductions targets with high integrity carbon removals credits has the potential to increase climate ambition. As companies face significant barriers to meeting their Scope 3 targets, such as supply chain control, costs, and data limitations, it makes sense to allow them to support abatement outside their value chain as a means of taking responsibility for those ongoing emissions. From a climate standpoint, this is preferable to inaction, and from an economic perspective, opening up carbon markets can stimulate further activities in the green sector, generating significant co-benefits and creating additional economic value through projects. To ensure that VCMIs Scope 3 claim provides adequate incentives for the purchases of removals, it will be necessary for it to make distinction between those credits representing emissions reductions activities with those delivering carbon removals. This is due to the inherent price differential between the two mitigation approaches, which if unaddressed, would lead to removals not receiving support commensurate with their climatic value on grounds of economic costs. This distinction should extend to establishing a sub quota for CDR, especially in light of the 1.5°C ambition and the crucial role of CDR towards net-zero, at net-zero and most importantly, towards addressing legacy emissions and a need for a global net-negative CO2 emissions balance in the second half of the century. Such a distinction need not be either/or; rather, a portfolio approach to carbon credit purchases should be encouraged, with a blend of reductions and removals activities within. Such a portfolio could be based on the Oxford Offsetting Principles[3], which require the purchase of removals in any credit portfolio, increasing as a proportion over time. The Principles also advise an increasing emphasis on removals activities harnessing permanent carbon storage over time. Without proactive guidance and clear claims, companies will lack the necessary incentives to invest in carbon removals today so that they can be relied upon to address residual emissions tomorrow. The finalisation of an influential demand side standard like VCMIs Scope 3 claim represents a pivotal opportunity to ensure removals are integrated into present day decarbonisation action. [1] The State of Carbon Dioxide Removal 2024 - 2nd Edition. DOI 10.17605/OSF.IO/F85QJ (2024) [2] The State of Carbon Dioxide Removal 2024 - 2nd Edition. DOI 10.17605/OSF.IO/F85QJ (2024) [3]Oxford Principles for Net Zero Aligned Carbon Offsetting (revised 2024). Oxford: Smith School of Enterprise and the Environment, University of Oxford.		
See reference 138 Valero. Strongly disagree; see responsive above. See response above.	General	Anonymous
No thank you	General	AHDB

Comments (compiled)	Section of the Claim	Respondent name/ organisation
3. Pilot FincoEnergies suggests that VCMI tests its final draft Scope 3 Claim framework via a pilot to ensure in particular that it can be implemented with minimal possible complications and barriers by companies of varying sizes and types. FincoEnergies would be willing to contribute its internal expertise and access to varied clients to assist VCMI in such a pilot. We encourage VCMI to reach out to us to explore such a collaboration.	General	FincoEnergies
The trust, confidence, pathway and ambition that the framework provides will empower companies to have the confidence required to take responsibility for their scope 3 emissions gap while they simultaneously generate and implement actions plans for reducing the gap to zero, ultimately getting them back on track to meeting their net-zero targets. The subsequent expected increased participation in a high-integrity carbon market contributes to accelerating progress towards global net-zero. Survey question submission.	General	FincoEnergies
While it seems a reasonable balance has been struck, FincoEnergies would like to stress that the Scope 3 Claim framework requirements would represent a significant investment in time and money to fulfill, and perhaps present a prohibitive barrier to some companies. Therefore, FincoEnergies urges VCMI to balance the valid purpose of the requirements with ensuring they do not become a prohibitively high hurdle for companies of various size and type, again with the purpose of promoting an inclusive approach. This consideration is particularly pertinent at these early stages of development of the Scope 3 Claim when there should be a strong focus on encouraging and maintaining participation in the framework. As such, we suggest that VCMI does not increase the stringency of the requirements, and ensures it carefully considers and responds accordingly to the feedback on this topic from a wide variety of companies of various size and type. Survey question submission.	General	FincoEnergies
The proposal in itself risks doing the opposite of acceleration progress towards global net zero. Several voluntary and now in the EU legal standards on transition pathways follow the UN HLEG recommendations that do not permit carbon credits to be used, only for residual emissions (5-10%). VCMI's proposal risks taking putting climate efforts several steps behind.	General	ECOS
We strongly recommend that the VCMI reconsiders the aim of the Scope 3 Claim. Carbon credits may have a place in companys contribution claims, this is where they may have an impact and contribute to the Global Net zero. Permitting carbon credits to be used for Scope 3, risks the credibility of VCMI and a companys climate efforts. See sources below for further research: Cullenward D, Badgley G, Chay F. Carbon offsets are incompatible with the Paris Agreement. One Earth. 2023 Sep 15;6(9):1085-8.	General	ECOS

Comments (compiled)	Section of the Claim	Respondent name/ organisation
SBTi:https://sciencebasedtargets.org/resources/files/Evidence-Synthesis-Report-Part-1-Carbon-Credits.pdf		
MSCI Carbon Markets recently published updated research on the relationship between emissions performance and the use of carbon credits. This new analysis finds that constituents of the MSCI ACWI Investable Markets Index (IMI) that use carbon credits perform better on a range of climate-performance metrics than those that have not used carbon credits. Users of carbon credits have reduced their absolute Scope 1 and 2 emissions more than twice as fast as non-users over the last five years, at a rate of 3.6% per annum (p.a.) vs. 1.5% p.a., based on our analysis of 624 material carbon-credit users and 2,041 non-users. Material carbon-credit users were more likely to have set a climate target than non-users (92% vs. 52%), and those targets were more likely to meet commonly accepted target-credibility criteria such as external validation by a third party, existence of short-term or interim targets and a demonstrated track record of achieving past targets. Previous research also found that allowing the use of carbon credits within the context of emission reduction targets would incentivise a significant number of companies to set or maintain science-based targets.	General	MSCI
While many companies have set ambitious targets—often in line with the Science Based Targets initiative (SBTi)—most are currently not meeting those targets, and there are few consequences for non-compliance. Given the scale of this challenge, it should remain a priority for all interested parties to establish mechanisms that enable companies lagging behind to continue making efforts to improve their climate impact.	General	MSCI
https://www.msci.com/www/research-report/corporate-emissions-performance/04975753259	General	MSCI
The flexibility of the claim should incentivize companies to set climate targets, and demonstrate climate mitigation, particularly as Scope 3 emissions are reported as the biggest barrier to setting targets (SBTi survey).	General	Anonymous
Taking into account the proposed requirements and safeguards, the Scope 3 Claim will help accelerate progress towards achieving global net-zero goals, for those companies eligible to use the Scope 3 Claim (e.g. have an emissions gap of less than 24%) The requirements provide direction for participation, removing ambiguity around the purchase of carbon credits and applying towards corporate decarbonization. However, improvements to the approach need to be implemented to ensure that the framework provides an actionable approach for more companies to abate their scope 3 emissions, including: - The approach should not be phased out arbitrarily in 2038. If a phase out year is essential, consider allowing companies to propose their own phase out year when they believe they will have addressed the emissions gap. This greater flexibility would better accommodate the unique circumstances of a greater range of companies. - The approach should be extended to allow for companies who are off track on Scope 1 and 2 to also use carbon credits towards their	General	Anew Climate

Comments (compiled)	Section of the Claim	Respondent name/ organisation
goals (and not simply for contribution). - The approach needs to address how credits can be counted towards climate targets (the use case), and the approach needs to provide an incentive for more companies to take action, being inclusive for all regions, sectors and scales. There is no strong incentive for corporates to act unless credits can count toward achievement of science-aligned net-zero goals (e.g. credits used for compensation, not limited to contributing to the global good). Only 2 companies have made a VCMI claim to date. What will motivate more companies to use the claims code and S3 claim? VCMI needs to have impact at scale and not become impractical guidance and standards. We believe more companies will chose to use VCMI and leverage the Scope 3 Claim if carbon credits can be used for compensation (e.g. towards achievement of science-aligned net zero goals). - The approach should clarify the type of claim that companies will be allowed to make. This is of crucial importance. The Scope 3 Claim mechanism is sufficiently complicated to explain, but ultimately, guidance on how company claims are communicated externally to stakeholders is one of VCMIs key value adds. - The approach should allow companies to set their emission trajectories that best fit their circumstances, provided they are science aligned; - The approach should be implemented in a step-wise approach, considering stock takes and re-calibration options. The Scope 3 claim methodology is overly complicated and not clear or easy to understand. The rationale for imposing 2038 as the deadline for closing the emissions gap could also be better explained. Again, this feels like a very arbitrary deadline - some companies will certainly still be off track and the methodology to get them back on track should not change mid-way through their decarbonization journey. These companies should be given the same opportunity to get on track. We propose giving companies the opportunity to propose their target for getting on track, e.g. phasing out the need for carbon credits and the Scope 3 Claim. Related to this comment on the applicability of the Scope 3 guidance, VCMI should aim to be the practical framework for the companies who want to take action but need more flexibility to use environmental attributes such as carbon credits in parallel to their own value chain emission reductions. VCMI does not need to fit into the SBTI framework but should strive to be an alternative.		
The Scope 3 Flexibility Claim is directionally correct but does not go far enough in affording companies the flexibility to tackle their Scope 3 emissions. In particular, we are concerned that the too-tight guardrails could disincentivize some companies from taking action, particularly in the developing world where slower adoption of green technologies will make these targets much more challenging. We also highlighted that requiring CCP or CORSIA approval will limit the pool of available credits and keep climate finance from flowing to some ineligible but still high-quality projects. We have one more point that we raised in our statement (sent via email) that we have not made elsewhere in this form: The 2038 phaseout date will severely limit investment in impactful carbon projects	General	Rubicon Carbon

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The mandatory 2038 phaseout date on the use of credits by companies will inevitably limit the willingness of investors to get involved in impactful carbon projects. This is because it takes years for a carbon project to get off the ground and then once it is established, such projects typically deliver credits continuously over decades. To understand this, imagine a project that is just being scoped today: such a project may begin to deliver its first credits in 2029 or 2030, and in order for the project to pay back the up-front investment required, it may be scheduled to deliver credits for 30-70 years. A 2038 phaseout, on the other hand, means that demand for these credits will likely drop off 14 years from now (and only 7-8 years from the first credit issuance), and this fact will inevitably limit the appetite of investors to get involved in such projects at the start. This will severely constrain the size of the market, and will limit climate impact as a result. There should be no phaseout date on the use of credits.		
Pinwheels view is that the Scope 3 Claim risks undermining climate action and is does not focus on the right section of the corporate world. VCMI should instead focus on enabling and highlighting leadership in the corporate community rather than supporting those who are falling behind to make claims that could appear to stakeholders and the public to be a demonstration of highly effective climate action. We argue that carbon credits should not be used as a flexibility mechanism to suggest that companies are on track to meet their targets when they have fallen behind, nor as adequate compensation for falling short of those targets. There are a number of ways that the Scope 3 Claim could undermine effective climate action. We know that there is significant public confusion about climate claims, with consumer research by the UKs Advertising Standards Authority finding significant uncertainty around claims such as carbon neutral and Net Zero. This is likely to be exacerbated by the existence of an additional Scope 3 Claim. Both stakeholders and consumers are likely to be to believe that the Scope 3 Claim represents appropriately leading climate action. This will make it hard for stakeholders to appropriately distinguish who the frontrunners are. This is regrettable. The claim also risks slowing progress against value chain emission reductions as companies would be able to make a compelling claim without delivering those reductions. This inherently incentivises inaction. The flexibility set out in the consultation is too permissive as it allows companies to use a large volume of credits for a very long time, before requiring them to get back on their science-aligned decarbonisation trajectory. In addition, we have learned through practice in the VCM that claims underpinned by carbon credits are cannot be fulfilled by the underlying emissions reductions or removals. We know many carbon credits do not deliver metric tonne of reductions or removals and there is a risk of future reversal. This means claims will based on carbon credits will come under scrutiny and are likely to be considered false or misleading in the future. The risk of this particularly acute where a company that is behind on scope 3 reductions, and therefore the claim is seen to have enabled climate inaction. This risks undermining confidence in the VCM and corporate climate action broadly.	General	Pinwheel

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The right approach for companies as they reduce their emissions, particularly where they are struggling, should be reporting, not claiming. Better than enabling a compensation claim would be to strongly recommend that companies make contributions to climate projects, with the inputs and outcomes of those contributions robustly reported. Those contributions would not undermine collective climate action through creation of moral hazard, public and stakeholder confusion, or the inherent heightening of greenwash risk. Contributions are not reliant on balancing in value chain emissions, so are therefore much lower risk, both for the organisations making the claims but also for confidence in the market collectively.		
The science is clear: both emissions reductions and carbon removal projects are necessary to limit climate change, and these efforts must take place in parallel. To align with the Paris Agreement, governments and businesses must drastically and urgently reduce emissions. For this reason, we firmly believe that carbon credits should not be allowed to count towards 1.5C emissions reduction targets. Companies must continue working aggressively to reduce their Scope 3 emissions, and allowing gaps against those targets to be closed with carbon credits erodes the credibility of both emission reduction targets and the use of carbon credits.	General	Anonymous
It is unclear if the Scope 3 claim will accelerate progress to net-zero. The Scope 3 claim may provide some companies more confidence in setting targets, especially those hesitant due to uncertainty about their ability to decarbonize their value chain, however this benefit may be outweighed unless clear quantification of companies scope 3 levers and emissions strategies are achieved.	General	Accela Research
Please see our responses above.	General	E-liability Institute
The VCMI Scope 3 Claim is designed to provide guidance for companies in pursuing additional climate action. Acknowledging a role for carbon credits in decarbonisation will accelerate progress towards net-zero. Incorporating a risk-based understanding of carbon credits could unlock further use and increase credibility of claims.	General	BeZero Carbon
Use of the Scope 3 flexibility claim also risks undermining progress on climate targets undertaken by frontrunner companies. There are companies which are engaging in the necessary pace and scale of climate action to reduce emissions within their value chains (see examples in Corporate Climate Responsibility Monitor 2024). The Scope 3 Claim could enable laggardly companies which have not undertaken efforts of the same level of ambition to reduce their value chain emissions to be able to claim similar progress towards reduction targets. This would disincentivise ambitious first movers, and could penalise front runners who have already committed and invested in ambitious mitigation pathways under the assumption there is no room for offsets. Some first mover companies have already spoken out against the flexible use of offsets on these grounds (see statements from H&M, and a number of French companies).	General	Anonymous

Comments (compiled)	Section of the Claim	Respondent name/ organisation
We are concerned that VCMI's Scope 3 Claim is misaligned with recent developments in tackling the challenges that companies face in reducing Scope 3 emissions. This year, the Science Based Targets initiative published a Scope 3 discussion paper (Aligning Corporate Value Chains to global Climate Goals, July 2024) to set out a number of frameworks to which will enable companies to focus on critical emission sources through transition-specific alignment targets, rather than relying only on aggregated GHG metrics that are vulnerable to creative accounting. This includes a disaggregation of outcome-based and impact-based targets, so that companies can gain recognition for aligning theirprocurement with their climate goals, leveraging their influence to catalyse decarbonisation through the supply chain, rather than relying on emissions data from sources which are not directly in their control to measure their progress. SBTi's robust and innovative approaches to Scope 3 challenges encourages companies to act on what they can control to reduce emissions directly linked to their own supply chains, rather than rely on outdated offsetting models, which were also found to be ineffective in SBTi's Synthesis report on carbon credits (July 2024). Other leading thinkers on science-based corporate net zero are developing similar ideas on how to credibly account for carbon credit purchases in company reports on climate progress, while emphasising the need to prioritise activities which result in emissions reductions directly within companies' value chains (see this paper, Is impact out of scope?, Axelsson et al, 2024). These developments do not denounce the purchase of carbon credits outright, but promote realistic accounting methods and target setting frameworks which allow companies to be recognised for directandindirect action on climate, through in-value chain mitigation and beyond value chain contributions, without conflating the two and encouraging manipulative emissions accounting. VCMI's Scope 3 Claim overlooks these crucial developments, and risks further fragmenting the patchwork of corporate climate standards and undermining urgent and necessary action on Scope 3 emissions by promoting a less robust alternative.	General	Anonymous
While a VCMI Carbon Integrity Claim demonstrates that a company excels in climate ambition and action, we welcome VCMI Scope 3 Claim that would allow companies facing Scope 3 challenges to also demonstrate their commitment and progress. Scope 3 emissions still pose a significant challenge for majority of the companies with net zero targets as well as deter new companies from setting a target in the first place. With the right guardrails in place, this initiative can promote wider participation in high integrity voluntary carbon markets, facilitating essential climate finance for emissions reduction and removal projects. However, we believe that fewer companies would be able to make a Scope 3 Claim compared to the previous proposal, as the additional criteria proposed and the 'emissions gap approach will both reduce how many companies are eligible to make a claim. In addition, reporting, reducing and then compensating for Scope 3 emissions with carbon credit in line with VCMI guidelines may be unachievable for some companies, particularly smaller firms, those in the Global South and those with complex supply chains. Overall, we suggest VCMI to allow for flexibility on 24% threshold, phaseout date and eligible credits to ensure greater uptake and impact.	General	RWEST

Comments (compiled)	Section of the Claim	Respondent name/ organisation
We do not agree with this statement. The entire Scope 3 claim methodology is misguided and will not aid in the acceleration towards global net-zero. As previously mentioned, the 24% flexibility is much too high of an allowance. If companies were to embrace this high-level of flexibility instead of decreasing their indirect emissions, it would severely threaten - rather than help us to meet - our global climate goals. While we recognise the challenges that companies face in tackling scope 3 emissions, the VCMI Scope 3 Claim is simply neither the best nor the most innovative approach. VCMI should look to the methodology presented by SBTi, who is at the forefront in the area of climate target setting and validation. SBTis proposed scope 3 "alignment targets"□ are more concrete and useful because they provide a focused and actionable framework that ensures a company's activities are directly contributing to global climate objectives. While alignment targets concentrate on specific, sector-relevant actions that could increase clarity and accountability, traditional aggregated GHG metrics lend themselves to obfuscation and creative accounting. Please refer to the criticism throughout the document. No.	General	Carbon Market Watch
The VCMI Scope 3 Claim document indicates that after January 1, 2026, claims could be substantiated solely through the purchase of carbon credits labeled with the Core Carbon Principles (CCP) certification. However, there are ongoing concerns about the CCP label, particularly regarding its lack of a requirement for host-country authorization under Article 6 of the Paris Agreement. Host-country authorization is crucial because it ensures that carbon credits are aligned with the countrys Nationally Determined Contributions (NDCs), safeguarding the integrity of the credits. Without this authorization, there is a risk of "double counting," where both the host country and the purchasing company claim the same carbon reductions. This undermines the overall integrity of the carbon market and diminishes its effectiveness in meeting global climate objectives. Moreover, the absence of host-country authorization creates loopholes, potentially allowing for emissions reductions to be counted multiple times, further diluting the value of carbon credits. Furthermore, the CCP certification includes Nature-Based Solutions (NBS) credits, which face several well-documented challenges: Permanence: Forest projects, a common form of NBS, struggle to guarantee long-term climate benefits. For meaningful climate protection, forests need to be preserved for at least 50 to 100 years, but there is currently no mechanism that ensures forest projects will last that long. Uncertain market conditions and the continued need for active forest protection""especially in developing countries""complicate this further. Leakage: The issue of leakage remains unresolved. When forest conservation in one area leads to deforestation being displaced to other regions, the overall climate benefit is negated. There is no clear method to accurately measure and mitigate the climate impacts of such displacement.	General	atmosfair

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Uncertain COâ,, Offset Market: Forest project operators often require significant upfront investment, leading to the sale of "upfront certificates," where credits are issued for future carbon sequestration by trees that have not yet fully matured. This creates a mismatch between when the credits are sold and when the carbon is sequestered, reducing the reliability of these credits. Given that the VCMI Scope 3 Claim was designed to address challenges companies face in meeting emissions goals, particularly those with approved Science-Based Targets (SBTi), it is essential that the claim pushes for the highest quality carbon credits. These credits should demonstrate clear additionality and secure host-country authorization under Article 6 of the Paris Agreement, ensuring they contribute meaningfully to global climate mitigation efforts. We strongly recommend that, in the long run, the Scope 3 Claim should exclusively consider carbon credits validated under Article 6 of the Paris Agreement. This recommendation is based on three key pillars that ensure the highest levels of integrity and accountability in carbon markets: Transparency: Article 6.2 mandates robust reporting on the use of Internationally Transferred Mitigation Outcomes (ITMOs), ensuring that emissions reductions are transparently tracked and accounted for. Additionally, the Enhanced Transparency Framework (ETF) from Article 13 requires detailed disclosure on how these ITMOs align with Nationally Determined Contributions (NDCs), preventing double counting and ensuring transparent, verifiable climate action. International Oversight and Strong Governance: Article 6.4 establishes a centralized supervisory body that oversees the validation, implementation, and monitoring of projects. This body ensures that all emissions reductions are rigorously verified before credits are issued, guaranteeing that only high-standard, accountable credits are traded globally. Host Country Involvement: Article 6 requires letters of authorization (LoAs) from host countries, confirming their voluntary participation and ensuring that emissions reductions are aligned with national climate strategies and NDCs. This process upholds the sovereignty of the host country and ensures that all projects meaningfully contribute to national and global climate goals. By adopting these Article 6-aligned credits, the Scope 3 Claim would promote transparency, rigorous oversight, and true climate alignment at both the national and international levels. N.A.		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Patch is of the view that VCMI can play a critical role in designing a framework that motivates corporates to maximise their decarbonisation potential, and take responsibility for residual emissions across their Scope 1, 2 and 3 emissions sooner rather than later. In general, Patch is supportive of VCMI's proposed Scope 3 Claim and associated guardrails. We view the following as important key principles to follow in finalizing a Scope 3 Claim, many of which we recognize are included in VCMI's proposed Scope 3 Claim: 1. Inclusion of an annual neutralisation target that provides a clear accounting period for corporates to take action against residual emissions 2. Support for the use of both nature based and engineered carbon credits, and reduction and removal credits, aligning with the IPCC standards and the Oxford Offsetting Principles. 3. Clear guidance on how corporates can account for and communicate action on annual residual emissions. 4. Consideration of disclosure requirements on the use of carbon credits, to streamline reporting requirements as best possible, for example the Corporate Sustainability Reporting Directive in the UK and California 1305 in the United States. 5. Adoption/ alignment with other global standards and bodies that are focused on driving quality and accountability in the use of carbon credits. 6. A mechanism to safeguard against the misuse of carbon credits, for example a tapering off of the percentage of scope 3 emissions that can be neutralised with carbon credits. With a view to sharing additional resources, we would also like to highlight several key reports that provide evidence of how corporates are tackling climate change through both decarbonization and use of high integrity carbon credits to tackle residual emissions include: https://www.nasdaq.com/solutions/corporate-esg-solutions/resources/global-net-zero-pulse-report/2024?utm_campaign=CPE-24-09-23-NYCW2024OrganicSocial&utm_medium=OrganicSocial&utm_source=LinkedIn https://www.ecosystemmarketplace.com/articles/new-research-carbon-credits-are-associated-with-businesses-decarbonizing-faster/ https://www.msci.com/www/research-report/corporate-emission-performance/04624149658 https://www.wemeanbusinesscoalition.org/accelerating-corporate-climate-finance/#key-findings	General	Patch

Comments (compiled)	Section of the Claim	Respondent name/ organisation
High-quality durable carbon removals are important to accelerate the global transition to net-zero and deliver the net in net-zero emissions. Puro.earth, a global carbon-crediting platform for durable carbon removals, supports that the VCMI should recognise and incentivize the immediate use of high-quality carbon removal credits. Clear incentives for companies to use high-quality carbon credits in the near-term will enable investment in projects and the supply of durable carbon removal to scale. We support the concept near-term neutralisation milestones on the pathway to net-zero. Near-term neutralisation milestones could enable companies providing durable CDR to scale this decade to reach the volumes required in the 2040s. In parallel, this supports companies wishing to meet future net-zero emissions and the activities they need to deliver the "net" in net-zero emissions. Puro.earth also asks for alignment between initiatives, with the new ISO net zero standard as well as emerging legislation such as the EU Green Claims Directive and work from the World Bank and SBTi (Science Based Targets initiative) revision to the Corporate Net-Zero Standard, and the Integrity Council on the VCM. In summary, we ask the VCMI to cover all scopes of emissions, to differentiate between avoidance, reduction and removals, and give a clear role for high-quality durable carbon removal credits on the pathway to net-zero emissions.	General	Puro.earth
Carbonplace wishes to express our support for the Voluntary Carbon Markets Integrity Initiative's (VCMI) open consultation on a scope 3 claim. We believe that this initiative is crucial for advancing the use of carbon credits and carbon markets as a key tool to address scope 3 emissions and accelerate the path to NetZero We commend the VCMI for initiating this consultation and for the valuable work being done by the Science Based Targets Initiative (SBTi) in developing guidance on the use of carbon credits. The SBTi's initial framework provides a solid foundation for exploring the potential of carbon credits to contribute to climate mitigation efforts. However, we recognise that for many companies, a significant portion of their emissions fall within scope 3, and there is currently a lack of clear and actionable guidance on how to address these emissions effectively. Carbon credits can offer a valuable interim solution for companies to make a meaningful impact on their carbon footprint, particularly for emissions that are difficult to abate or control directly. Moreover, carbon markets provide a mechanism for all companies to contribute to reducing global emissions. By developing robust and credible scope 3 claim standards, the VCMI can play a vital role in: • Driving standardised disclosure of corporate emissions and use of credits. • Encouraging responsible and transparent use of carbon credits: Clear guidelines can help to prevent the misuse of credits and ensure that they are used to support genuine emissions reductions. • Providing companies with a pathway to climate action: Well-defined scope 3 claims can empower companies to take immediate steps	General	Carbonplace

Comments (compiled)	Section of the Claim	Respondent name/ organisation
to reduce their carbon footprint and contribute to a more sustainable future. • Promoting market integrity and confidence: A standardised approach to scope 3 claims can help to build trust in the voluntary carbon market and attract greater investment in climate solutions. We urge the VCMI to continue its efforts to develop comprehensive and science-based guidelines for scope 3 claims. By working collaboratively with stakeholders across the industry, we can create a framework that supports the effective use of carbon credits as a tool for climate mitigation and drives positive change.		
Overall we welcome VCMI's consideration of flexibility and a more pragmatic approach to corporate net zero delivery. Taking into account the proposed requirements and safeguards, the Scope 3 Claim could help accelerate progress towards achieving global net-zero goals, for those companies eligible to use the Scope 3 Claim (e.g. have an emissions gap of less than 24%). The requirements provide direction for participation, removing ambiguity around the purchase of carbon credits and applying towards corporate decarbonization. However, improvements to the approach can be implemented to ensure that the framework provides an actionable approach for companies to abate their scope 3 emissions, including: 1. Alignment with the IETA Guidelines for the use of high quality carbon credits; 2. The approach needs to provide an incentive for companies to take action, being inclusive for all regions, sectors and scales. There is no strong incentive for corporates to act unless credits can count toward achievement of science-aligned net-zero short and long term targets. Only 2 companies have made a VCMI claim to date. The approach needs to motivate more companies to use the claims code and S3 claim. VCMI needs to have impact at scale and not become impractical guidance and standard. We believe more companies will chose to use VCMI and leverage the Scope 3 Claim if carbon credits can be used for compensation (e.g. towards achievement of science-aligned net zero goals); 3. The approach shall address how credits can be counted towards climate targets (the use case), as this is the priority and less so the claim. We recommend VCMI pays equivalent attention to use cases; 4. The approach shall clarify the type of claim that companies will be allowed to make (exact claim name/terminology).This is of crucial importance. The Scope 3 Claim mechanism is sufficiently complicated to explain, but ultimately, guidance on how company claims are communicated externally to stakeholders is one of VCMIs key value adds;	General	IETA

Comments (compiled)	Section of the Claim	Respondent name/ organisation
5. The approach need to provide enough flexibility in terms of emission gap thresholds and phase-out year to accommodate all types of companies´ circumstances and sectors. The 24% limit is overly arbitrary and will likely exclude companies who want to leverage this mechanism. The approach should not be phased out arbitrarily in 2038. If a phase out year is essential, consider allowing companies to propose their own phase out year when they believe they will have addressed the emissions gap. This greater flexibility would better accommodate the unique circumstances of a greater range of companies; 6. The approach needs to ensure no double-claiming occurs between scope 1, 2 and 3 emissions; 7. The approach should be extended to allow for companies who are off track on Scope 1 and 2 to also use carbon credits towards their goals (and not simply for contribution); 8. The approach shall allow companies to set their emission trajectories that best fit their circumstances, provided they are science aligned; 9. The approach shall be implemented in a step-wise approach, considering stock takes and re-calibration options. In the absence of a consistent, formalized standard for the industry, this provides guidance on market participation to organizations. However, the 24% emissions gap threshold and 2038 phase-out are overly arbitrary. Similarly, while we support reporting on progress, and believe this should be encouraged, requiring that companies report on their failures as to why they havent made more progress at closing the emissions gap is overly onerous and unrealistic.		
The Scope 3 Claim, with the proposed requirements and guardrails, offers a framework to address scope 3 targets, channeling financial flows to initiatives that reduce value chain emissions. The proposed methodology balances flexibility, rigor and pragmatism, adding credibility to the ecosystem of voluntary carbon market initiatives. The guardrails and timeline of the methodology was derived from a robust data-driven approach that reassures the guardrails and targets are both ambitious and realistic. Please consider all prior comments on technical points and suggested language addition on some reputationally sensitive issues.	General	Center for Climate and Energy Solutions
General comments (summary): First, congratulations. A lot of work and background research has gone into it and there is a clear positive evolution from the first draft. The proposed text of the Scope 3 Claim offers a generally balanced and credible approach to enable companies to address their missed scope 3 targets through high-integrity carbon credits with a series of guardrails and requirements to making the claim. We especially	General	Center for Climate and Energy Solutions

Comments (compiled)	Section of the Claim	Respondent name/ organisation
appreciate the requirements around disclosing the reasons for not being able to meet the target and remediation plan enabling progress. In addition to several comments, we take the opportunity to offer, through this consultation: 1. a more general recommendation on building the right ecosystem to enhance companies' buy in for the Scope 3 claim 2. two main technical recommendations briefly reported here and further elaborated in relevant questions below 1) We do believe that the success of the VCMI Scope 3 Claim will be enhanced by an acknowledgment of different and complementary efforts supporting supply chain decarbonization, including through the use of environmental attribute certificates representing emissions reductions within a company's value chain (e.g. AIM Platform). In this context, we encourage further discussions on how the VCM can enhance implementation of within value chain solutions . 2) A clarification would also be needed regarding the accessibility of the claim 'any given year' until 2038. Would this include the time t(y) = t(interim target) or only as long as t(y) < t(interim target) ? This would clarify whether it is possible for a company to make such a Claim on the way to meeting the interim target only, or even at the interim target year (which could be more problematic for some). 3) On a linguistic more than technical note, and in the attempt to strike a balance that could help create more convergence between VCMI and other efforts, we suggest considering to separate out communication of the use of carbon credits covering the Scope 3 Claim emissions gap and any retirement of credits above and beyond The point here is to avoid having the same language to cover multiple objectives (like the higher level claims do, Silver, Gold, Platinum) when the internal decarbonization target has actually been missed. The other higher level claims (Silver, Gold, Platinum) are accessible only once net zero pathway is met/companies are on track to meeting their interim targets; and differ for about how many carbon credits (as % of remaining emissions) are retired to go above and beyond committed decarbonization. The clarity of the Scope 3 claim and its alignment with the mitigation hierarchy may be blurred with the simple "at least"□ - we would rather suggest having a Scope 3 claim that states the coverage of the gap on one side, and any excess be part of a separate "addendum"□ communication, whenever this situation is verified, with separate and clear communication of credits retired above and beyond. If a company had the appetite and capacity to purchase and retire more high-quality carbon credits, i.e. beyond what would be used to cover the scope 3 emissions gap, and sourced from geographies and sectors not necessarily related to the supply chain, we suggest this beyond value chain effort be part of additional language for the Scope 3 claim (if not a separate claim altogether), to avoid potential confusion and greenwashing accusations.		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Other comments on the text above: We suggest elaborating on the definition of the terms "trajectory emissions" and "target boundary" as explicitly as possible in the main body of the text. A glossary at the beginning of the final document, including these terms, could be helpful. We acknowledge that there is a footnote explanation for trajectory emissions, which is expressed as "the emissions indicated by the company's trajectory consistent with its net zero commitment in the year the company is making a claim". To avoid using "trajectory" within the definition of "trajectory emissions" itself, the definition could be rephrased as "emissions indicated by the company's pathway in line with science-aligned scope 3 targets". The Scope 3 Claims guidance offers no definition for "target boundary". The GHG Protocol for example uses the term "boundary" to refer to the relevant organizational assets and other sources that influence the calculation of their scope 1, 2, and 3 emissions. The Scope 3 Claims guidance would be strengthened if it explicitly acknowledged corporate transition plans. It is generally accepted that a science-aligned corporate net-zero target is not credible unless it is accompanied by a transition plan that lays out the strategies and actions that will be taken to achieve the net-zero target. Voluntary guidance from GFANZ, UK TPT, and ISSB outlines best practice for corporate transition planning. The EU CSRD requires specific disclosures around transition planning. Actions that are being taken by a company to address Scope 3 emissions should be embodied in the transition plan. When companies have to modify strategy and tools used to address a Scope 3 emissions gap this should be reflected in a revised transition plan and reporting. This will help ensure that the use of a Scope 3 Claim is part of a holistic corporate emission reduction strategy.		
Overall, FincoEnergies supports the initiative in the general sense. However, we provide further feedback on the specifics of the system later in this consultation feedback.	General	FincoEnergies
We strongly support VCMI's goal of incentivizing companies to reduce embedded emissions in procured goods and services and recognize the importance of substantiating embodied emissions. However, we strongly disagree with the fundamental methodology used to develop Scope 3 claims. We urge VCMI to adopt a more rigorous method for carbon accounting that is readily available for VCMI to adopt (detailed below). The construction of Scope 3 measures, which begins from the reporting entity's perspective and attempts to divine emissions up and down the value chain, is fundamentally flawed. This approach cannot be operationalized in practice without guesstimates and industry	General	E-liability Institute

Comments (compiled)	Section of the Claim	Respondent name/ organisation
averages, rendering accurate data on actual emissions attributable to a company's actions infeasible. Moreover, the Scope 3 standard blurs the line between upstream incurred emissions and downstream prospective emissions, diluting accountability. Holding entities responsible for emissions they cannot control or did not directly influence fosters an environment of diffused responsibility and chicanery rather than enhancing overall accountability. The redundancy and economic inefficiency inherent in Scope 3 calculations further weaken its credibility. Each entity in a value chain must engage in similar guesstimates, likely violating basic cost-benefit principles. Most concerning is how the Scope 3 framework permits multiple counting of the same emissions (and reductions) by different entities, leading to gross over-estimates of global emissions (and reductions). Such over-counting indicates a system that lacks basic integrity. All these defects and limitations would be eliminated if VCMI adopted the E-liability carbon accounting framework, which offers a more rigorous method for carbon accounting, based on tried-and-tested financial-accounting principles. This approach is detailed in the November 2021 Harvard Business Review article "Accounting for Climate Change"□ by Professors Robert S. Kaplan (Harvard) and Karthik Ramanna (Oxford), accessible here: (https://hbr.org/2021/11/accounting-for-climate-change (published, paywall) or http://dx.doi.org/10.2139/ssrn.3900146 (unpublished, free). The E-liability Institute's draft proto-standard for carbon accounting provides clear guidelines on how entities can calculate and report the greenhouse gas (GHG) emissions embedded in their outputs (https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4957358). The E-liability method incentivizes companies to use decarbonization targets to drive their product design, sourcing, purchasing, and logistics decisions. By utilizing primary supplier-specific emissions data rather than industry averages, companies gain an accurate understanding of supply-chain emissions effected by their actions. This method ensures accountability by transferring the GHG information embedded in products along the supply chain, much like a value-added system. Each company is responsible for its direct emissions and all upstream emissions related to its purchased products and services. This system simplifies the carbon reporting process, enabling companies to produce standardized (comparable and consistent) reports of their cradle-to-gate carbon footprints, akin to well-understood financial reporting. We further acknowledge that a comprehensive strategy for addressing climate change must encompass the removal of prior emissions from the atmosphere. However, we caution against the current structure of carbon markets. Without robust accounting for monitoring offsets, current trading systems facilitate misrepresentation and fraud."Pathways versus incentives: climate activism to climate-aligned portfolio management,"□ a recently published article in the Oxford Open Climate Change Journal by researchers at Stanford University,		

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highlights the challenges of emissions alignment exercises and the need for accurate and verifiable carbon accounting in pursuit of climate-aligned investment decision-making (https://academic.oup.com/oocc/article/4/1/kgae013/7723598?searchresult=1). To address our concerns, we propose five principles to underpin markets for GHG removal and storage, based on the August 2023 HBR article "Accounting for Carbon Offsets," co-authored by Professor Robert Kaplan, Professor Karthik Ramanna, and Marc Roston (https://hbr.org/2023/07/accounting-for-carbon-offsets). We recommend that VCMI consider how to embed these principles into its framework more generally. Only removal offsets may reduce reported emissions: A valid offset must remove an equivalent quantity of GHG from the atmosphere and sequester it for at least as long as the underlying emissions remain in the atmosphere. Some current standards fail to differentiate between removal offsets (which address existing GHG) and avoidance offsets (which merely prevent prospective GHG from being released). Companies should be permitted to buy or sell valid removal offsets (but not underlying emissions or E-liabilities): This encourages firms to treat carbon removals as any other purchased good or service, allowing entities with a comparative advantage in capturing and sequestering carbon to access funding for these beneficial activities. The criteria for recognition of removal offsets as assets on environmental ledgers. The criteria for "netting" removal offsets against incurred emissions or E-liabilities. The criteria for determining when and how a previously recognized removal offset asset is impaired (for instance, due to a natural disaster). In conclusion, we strongly advise VCMI to reject the Scope 3 claims framework in light of its deficiencies described above. Adopting the E-liability and E-asset methods for carbon accounting will ensure greater accuracy and accountability in emissions reporting, supporting vibrant markets that drive the global transition to geological net zero. VCMI has a unique opportunity to do for the world what the introduction of Generally Accepted Accounting Principles (or GAAP) did starting in the 1930s - i.e., unleash innovation, prosperity, and sustained wellbeing. We appreciate your consideration of our recommendations and look forward to engaging further in this critical dialogue. We respectfully disagree with the premise of the Scope 3 Claim as articulated by the VCMI. One critical flaw in the existing framework, particularly within the GHG Protocol, is its potential for the corporate sector to grossly overcount the emissions reductions made by a single entity. For example, the aviation sector's emissions reductions, as highlighted in a recent Bloomberg article, illustrate how overlapping claims mislead stakeholders about actual progress in emissions reduction (https://www.bloomberg.com/news/articles/2024-07-24/the-accounting-flaw-at-the-heart-of-financed-emissions). We are sympathetic to the idea that companies can "net" their emissions liabilities using credible removal offsets. This is the whole purpose of the E-liability and E-asset framework (together, E-ledgers). However, this objective can scarcely be accomplished using the Scope 3 framework and the existing definitions of carbon offsets, both of which are riddled with conceptual flaws. We recommend that		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
the document be revised on the basis described in our answers above. We stand ready to advise on drafting standards should VCMI accept this transformative opportunity.		
What is the Carbon Integrity Claim referring to? Should we simply aim at this instead of having that as a optional secondary target ? the last sentence of the claim bring a new concept of Carbon Integrity Claim which confuse the whole climate in our opinion. We should aim at the most ambitious claim possible	General	BURN manufacturing
N/A	General	Carbonplace
In our view, the Scope 3 claim methodology is neither fully clear nor overly complex. The Voluntary Carbon Markets Integrity Initiative (VCMI) introduced the Scope 3 Claim to help companies tackle the significant challenges of reducing Scope 3 emissions, which are crucial for achieving net-zero goals. Currently, over 80% of the world's largest companies have yet to set meaningful emission reduction targets. Even those with science-based targets often struggle with Scope 3 reductions, due to high costs and the complexity of their supply chains. The Scope 3 Claim offers a way for companies to take immediate action by purchasing high-quality carbon credits while simultaneously investing in long-term decarbonization strategies. This framework ensures companies stay aligned with science-based pathways and avoid greenwashing, with the ultimate goal of accelerating corporate decarbonization by 2038. Full implementation is targeted for 2025. By providing this balance between immediate action and long-term planning, the Scope 3 Claim could serve as an essential tool in helping businesses move forward more effectively.	General	Solutions Will
API has submitted high-level comments on the VCMI Beta Scope 3 Claim via email to vcmiscope3claim@bsigroup.com.	General	American Petroleum Institute

Comments (compiled)	Section of the Claim	Respondent name/ organisation
For the SBTi's latest publications on the potential role of environmental attribute certificates including carbon credits in addressing value chain emissions, please refer to our four publications released on 30 July, including: Scope 3 discussion paper Synthesis report of evidence on the effectiveness of Environmental Attribute Certificates in corporate climate targets - Part 1: Carbon credits The SBTi is also conducting research to understand how the ambition of companies' future targets should be adjusted if current targets are not met. This research is focussed on developing methods that would retain the carbon budget, and does not consider the use of carbon credits to act as a substitute for value chain emission reductions. We have highlighted several relevant sections of the July publications below. Please refer to the full reports for all relevant details: Scope 3 discussion paper Pages: p.34-p.43 Chapter: Exploring the role of environmental attribute certificates in addressing value chain emissions. This sub-section provides examples of scenarios where certification might help to substantiate claims in corporate mitigation strategies consistent with achieving net-zero emissions globally. It also highlights risks associated with scenarios deemed to be more sensitive. These scenarios are presented solely to illustrate potential uses of certificates in scenarios that the authors have identified as potentially consistent with global climate goals and should be understood as neither exhaustive nor prescriptive. The inclusion of any of these scenarios, or others, in SBTi standards is subject to the standard development process described in the SOP for Development of SBTi Standards. Scenario 3: Use of carbon credits from mitigation activities within the value chain to substantiate value chain emission reduction claims It is important to note that SBTi standards require that carbon credits are not counted as emission reductions toward the progress of companies' science-based targets. However, this scenario suggests the possibility of carbon credits to support value chain emission reduction claims if they represent emission abatement (i.e. emission reduction within the value chain, as opposed to emissions	General	SBTi

Comments (compiled)	Section of the Claim	Respondent name/ organisation
avoidance or carbon dioxide removal) from sources traceable to the company's value chain, and that these mitigation outcomes are fungible with corporate GHG emissions inventory. Some of the areas that require further exploration in the use case of carbon credits to substantiate value chain emission reduction claims include: Defining and standardizing value chain traceability. Accounting adjustments when baseline emissions from the emission source are estimated using secondary data. Adjusting for activities issuing multiple certificates that substantiate climate claims (e.g. commodity certificates). Adjustments needed to prevent double claiming. Furthermore, additional guidance is needed on appropriate claims for entities directly mitigating an emission source (e.g. through the provision of finance) versus those with indirect involvement in the abatement activity. Scenario 4: Use of carbon credits to support neutralization of residual emissions The SBTi Corporate Net-Zero Standard requires companies to neutralize the climate impact of scientifically-defined residual emissions at their net-zero target year and any future emissions by permanently removing and storing carbon from the atmosphere. Scientifically-defined residual emissions are those that remain after the implementation of all possible mitigation measures considered in pathways that limit warming to 1.5°C with no or limited overshoot, covering scope 1, 2, and 3 emissions. Carbon credits from GHG removal activities are a potential means to finance the neutralization of these residual emissions. The SBTi is conducting research to identify eligible solutions and technologies to ensure that neutralization is achieved through carbon removal and storage with permanence matching the impact of any remaining residual emissions. The SBTi will subsequently work to establish guidelines to ensure the effective and responsible use of these neutralization methods within its standards. Some of the key concepts being explored include: Matching emissions type with storage type (biogenic or geologic): This approach would require that the type of carbon removal matches the type of emission, whether biogenic or fossil, to ensure compatibility with the carbon cycle's slow or fast domains. Matching atmospheric lifetime with storage timescale (physical equivalence): This approach would require the storage duration to		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
match the atmospheric lifetime of the residual GHGs, allowing short-lived GHGs (e.g. methane) to be neutralized by temporary storage and long-lived GHGs (e.g. carbon dioxide) by long-term storage. Establishing fungibility between removal methods (economic equivalence): Other approaches involve creating equivalence ratios to quantitatively value carbon dioxide removal (CDR) with different levels of permanence in carbon removal, balancing the economic benefits of reducing warming temporarily against long-term climate damage costs. However, these approaches carry risks due to potential discrepancies in assessing storage times, costs, and impacts on long-term temperature change. Scenario 5: Use of carbon credits to support beyond value chain mitigation Businesses can play a critical role in the transition towards a net-zero economy, not only by driving this transformation within their immediate operations and value chains, but also by contributing to the broader societal shift towards net-zero through beyond value chain mitigation (BVCM). Companies can deliver BVCM through a range of instruments including through the purchase and retirement of high-quality carbon credits and direct investments (e.g. equity, debt or project finance). The traditional practice of offsetting, which implies purchasing carbon credits instead of abating emissions at their source, involves a number of risks, especially considering that all emissions sources, including those within corporate value chains and those beyond, need to be mitigated to achieve a state of global net-zero emissions. However, corporates and corporate decarbonization programs might incentivize and contribute to mitigation finance to support beyond value chain mitigation through carbon markets. To support this, this paper explores how companies could be incentivized to abate emissions within their value chain while also taking responsibility for unabated emissions through beyond value chain mitigation. Some of the risks that are known about the practice of emissions offsetting and potential mitigation measures are presented in Table 2 on p.40. These mitigation measures may be considered in the use case described in this scenario. Synthesis report of evidence on the effectiveness of Environmental Attribute Certificates in corporate climate targets - Part 1: Carbon credits Summary of key findings across themes and evidence tiers (table 2, p.8) Theme 1: Mitigation outcomes and conditions for effectiveness (Total number of relevant submission = 41)		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
The empirical and observational evidence in Tiers A and B (those with less risk of bias or irrelevance) suggests that various types of carbon credits are ineffective in delivering their intended mitigation outcomes. Evidence in Tier C (those with higher risk of bias or irrelevance) shows more mixed results. There was no evidence submitted that identified characteristics or operating conditions associated with effective carbon credits and projects. Theme 2: Corporate Use Cases for Carbon Credits and Implications for Net-Zero Aligned Transformation and Climate Finance (Total number of relevant submission = 31) The evidence suggests that there could be clear risks to corporate use of carbon credits for the purpose of offsetting. This includes potential unintended effects of hindering the net-zero transformation and/or reducing climate finance. BVCM and contribution claim approaches may represent preferable models for accelerating net-zero transformation and increasing climate finance. Theme 3: Claims (Total number of relevant submission = 19) All Tier A evidence challenge the legitimacy of offsetting claims, arguing that treating carbon credits as fungible with other sources, sinks, or reductions of emissions is inadvisable, illogical, or damaging to global mitigation goals. Two of the three Tier B evidence submissions oppose offsetting claims and 10 of the 12 Tier C evidence submissions directly oppose offsetting claims, with the other two not taking a strong stance either way. A number of evidence submissions highlight that the quantity and diversity of claims has created confusion amongst corporates and other actors.		
We understand that VCMI intends for the Scope 3 claim to enable companies to credibly purchase carbon credits to cover gaps in reducing Scope 3 emissions along net-zero timelines due to a range market, technologic, and other barriers, but the claim potentially undermines company incentive to focus on and even accelerate Scope 3 reductions and portrays carbon credit purchases as a stopgap measure rather than a necessary element alongside operations and value chain reductions to support climate imperatives, including investment in nature, methane destruction, etc. While companies are struggling to address certain categories of Scope 3 emissions, VCMI must ensure that companies set and meet near-term reduction targets (particularly between now and 2030) and that credit purchase does not come at the expense of continued	Option boxes	Netflix

Comments (compiled)	Section of the Claim	Respondent name/ organisation
progress toward meeting such targets. Existing climate target initiatives such as SBTi are currently amending their recognized pathways for how companies set and meet Scope 3 reduction targets, and VCMI should complement these efforts. The Scope 3 claim's provisions for companies to disclose and discuss the barriers they face in reducing Scope 3 emissions and for "investing to overcome existing barriers"□ are not sufficient in demonstrating that a company will eventually get back on track in making necessary Scope 3 reductions. Public critics of the Scope 3 claim argue that it permits carbon credit purchases to substitute for necessary immediate Scope 3 reductions and limits company ambition in accelerating Scope 3 reductions and resources that could otherwise go toward reductions. To address these criticisms, VCMI should strengthen several criteria for making the Scope 3 claim, including: - Emphasizing that credit purchases must address emissions outside of a GHG reduction target boundary. - Directing companies to focus on carbon credits that are sectorally or geographically-related to emissions sources that they will eventually have to address under Scope 3 reduction targets. - Developing clearer metrics and criteria for companies to indicate when they will get back on the necessary trajectory for reducing Scope 3 emissions. Directing companies to source sectorally relevant carbon credits could potentially help bolster the credibility of the Scope 3 claim since companies would focus on solutions that they will ultimately need to achieve Scope 3 reductions.		
We disagree with the idea that setting a Scope 3 emissions gap limit at 24% is an adequate threshold to ensure meaningful progress. 24% of a make-believe number is still a make-believe number. The current Scope 3 framework is deeply flawed due to its reliance on broad estimates and lack of precise carbon accounting. This threshold may enable some companies to claim progress without accurately accounting for the full extent of their emissions. Rather than setting arbitrary limits, we need robust carbon accounting methods like the E-liability approach, which provides granular, auditable emissions data across the value chain. Only then can we ensure that companies are genuinely reducing emissions and not exploiting gaps in the system. As outlined in previous responses, we respectfully disagree with the premise of the Scope 3 Claim as a meaningful basis for accountability. We recommend that the document be revised on the basis described in our answers above. We stand ready to advise on drafting standards should VCMI accept this transformative opportunity.	General	E-liability Institute
It is reasonable to have this expectation as long as companies don't break their promises in the future. The idea of rewarding companies for insufficient short-term climate action in order to incentivise long-term action is misguided because companies have a strong motivation to make - and profit from - these claims now, regardless of their actual future intentions. Companies that have a change of heart can then withdraw from the initiative at a later time, which has been done before, e.g. when Shell abandoned its 2035 target and weakened its 2030 goal.	General	Carbon Market Watch
For the SBTis latest publications exploring the potential role of environmental attribute certificates including carbon credits in addressing value chain emissionsplease refer to our four publications released on 30 July, including:	General	SBTi

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Scope 3 discussion paper Synthesis report of evidence on the effectiveness of Environmental Attribute Certificates in corporate climate targets - Part 1: Carbon credits The SBTi is also conducting research to understand how the ambition of companies' future targets should be adjusted if current targets are not met. This research is focussed on developing methods that would retain the carbon budget, and does not consider the use of carbon credits to act as a substitute for value chain emission reductions. We have highlighted several relevant sections of the July publications below. Please refer to the full reports for all relevant details: Scope 3 discussion paper Pages: p.34-p.43 Chapter: Exploring the role of environmental attribute certificates in addressing value chain emissions. This sub-section provides examples of scenarios where certification might help to substantiate claims in corporate mitigation strategies consistent with achieving net-zero emissions globally. It also highlights risks associated with scenarios deemed to be more sensitive. These scenarios are presented solely to illustrate potential uses of certificates in scenarios that the authors have identified as potentially consistent with global climate goals and shouldbe understood as neither exhaustive nor prescriptive. The inclusion of any of these scenarios, or others, in SBTi standards is subject to the standard development process described in the SOP for Development of SBTi Standards. Scenario 3: Use of carbon credits from mitigation activities within the value chain to substantiate value chain emission reduction claims It is important to note that SBTi standards require that carbon credits are not counted as emission reductions toward the progress of companies science-based targets. However, this scenario suggests the possibility of carbon credits to support value chain emission reduction claims if they represent emission abatement (i.e. emission reduction within the value chain, as opposed to emissions avoidance or carbon dioxide removal) from sources traceable to the company's value chain, and that these mitigation outcomes are fungible with corporate GHG emissions inventory. Some of the areas that require further exploration in the use case of carbon credits to substantiate value chain emission reduction claims include:		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Defining and standardizing value chain traceability. Accounting adjustments when baseline emissions from the emission source are estimated using secondary data. Adjusting for activities issuing multiple certificates that substantiate climate claims (e.g. commodity certificates). Adjustments needed to prevent double claiming. Furthermore, additional guidance is needed on appropriate claims for entities directly mitigating an emission source (e.g. through the provision of finance) versus those with indirect involvement in the abatement activity. Scenario 4: Use of carbon credits to support neutralization of residual emissions The SBTi Corporate Net-Zero Standard requires companies to neutralize the climate impact of scientifically-defined residual emissions at their net-zero target year and any future emissions by permanently removing and storing carbon from the atmosphere. Scientifically-defined residual emissions are those that remain after the implementation of all possible mitigation measures considered in pathways that limit warming to 1.5°C with no or limited overshoot, covering scope 1, 2, and 3 emissions. Carbon credits from GHG removal activities are a potential means to finance the neutralization of these residual emissions. The SBTi is conducting research to identify eligible solutions and technologies to ensure that neutralization is achieved through carbon removal and storage with permanence matching the impact of any remaining residual emissions. The SBTi will subsequently work to establish guidelines to ensure the effective and responsible use of these neutralization methods within its standards. Some of the key concepts being explored include: Matching emissions type with storage type (biogenic or geologic): This approach would require that the type of carbon removal matches the type of emission, whether biogenic or fossil, to ensure compatibility with the carbon cycle's slow or fast domains. Matching atmospheric lifetime with storage timescale (physical equivalence): This approach would require the storage duration to match the atmospheric lifetime of the residual GHGs, allowing short-lived GHGs (e.g. methane) to be neutralized by temporary storage and long-lived GHGs (e.g. carbon dioxide) by long-term storage. Establishing fungibility between removal methods (economic equivalence): Other approaches involve creating equivalence ratios to quantitatively value carbon dioxide removal (CDR) with different levels of permanence in carbon removal, balancing the economic		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
benefits of reducing warming temporarily against long-term climate damage costs. However, these approaches carry risks due to potential discrepancies in assessing storage times, costs, and impacts on long-term temperature change. Scenario 5: Use of carbon credits to support beyond value chain mitigation Businesses can play a critical role in the transition towards a net-zero economy, not only by driving this transformation within their immediate operations and value chains, but also by contributing to the broader societal shift towards net-zero through beyond value chain mitigation (BVCM). Companies can deliver BVCM through a range of instruments including through the purchase and retirement of high-quality carbon credits and direct investments (e.g. equity, debt or project finance). The traditional practice of offsetting, which implies purchasing carbon credits instead of abating emissions at their source, involves a number of risks, especially considering that all emissions sources, including those within corporate value chains and those beyond, need to be mitigated to achieve a state of global net-zero emissions. However, corporates and corporate decarbonization programs might incentivize and contribute to mitigation finance to support beyond value chain mitigation through carbon markets. To support this, this paper explores how companies could be incentivized to abate emissions within their value chain while also taking responsibility for unabated emissions through beyond value chain mitigation. Some of the risks that are known about the practice of emissions offsetting and potential mitigation measures are presented in Table 2 on p.40. These mitigation measures may be considered in the use case described in this scenario. Synthesis report of evidence on the effectiveness of Environmental Attribute Certificates in corporate climate targets - Part 1: Carbon credits Summary of key findings across themes and evidence tiers (table 2, p.8) Theme 1: Mitigation outcomes and conditions for effectiveness (Total number of relevant submission = 41) The empirical and observational evidence in Tiers A and B (those with less risk of bias or irrelevance) suggests that various types of carbon credits are ineffective in delivering their intended mitigation outcomes.		

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Evidence in Tier C (those with higher risk of bias or irrelevance) shows more mixed results. There was no evidence submitted that identified characteristics or operating conditions associated with effective carbon credits and projects. Theme 2: Corporate Use Cases for Carbon Credits and Implications for Net-Zero Aligned Transformation and Climate Finance (Total number of relevant submission = 31) The evidence suggests that there could be clear risks to corporate use of carbon credits for the purpose of offsetting. This includes potential unintended effects of hindering the net-zero transformation and/or reducing climate finance. BVCM and contribution claim approaches may represent preferable models for accelerating net-zero transformation and increasing climate finance. Theme 3: Claims (Total number of relevant submission = 19) All Tier A evidence challenge the legitimacy of offsetting claims, arguing that treating carbon credits as fungible with other sources, sinks, or reductions of emissions is inadvisable, illogical, or damaging to global mitigation goals. Two of the three Tier B evidence submissions oppose offsetting claims and 10 of the 12 Tier C evidence submissions directly oppose offsetting claims, with the other two not taking a strong stance either way. A number of evidence submissions highlight that the quantity and diversity of claims has created confusion amongst corporates and other actors.		
This statement seems to be similar to Box 3 statement and does not accurately reflect the information presented in this section.	General	AHDB
While encouraging companies to choose sectorally and geographically aligned credits may seem like a way to localize responsibility for emissions, the approach of using carbon credits in the first place shifts away the focus from real emission reductions within the value chain.Carbon credits should not be used in Scope 3. We urge VCMI to reconsider the proposal in this paper, as it risks the reputation and credibility of VCMI and a company that decides to use it.	General	ECOS

Comments (compiled)	Section of the Claim	Respondent name/ organisation
As outlined in previous responses, we respectfully disagree with the premise of the Scope 3 Claim as a meaningful basis for accountability. We recommend that the document be revised on the basis of our previous comments. As outlined in previous responses, we respectfully disagree with the premise of the Scope 3 Claim as a meaningful basis for accountability. We recommend that the document be revised on the basis of our previous comments.	General	E-liability Institute
A review date (e.g. about 5 years) is useful to assess if the guidance is serving its purpose and still relevant. The requirements can be tightened or loosened, or changed completely. Put in place a review date for Scope 3 guidance, with the potential for guidance to be revised and adjusted.	General	Anonymous
Additional recommendation for an organisation to put a price on carbon (above and beyond the current price of a carbon credit) as a mechanism to drive reduction in the business. For more on internal carbon pricing, see: - our webinar, featuring CDP 's carbon pricing report, and WSP, who helped Microsoft implement their internal carbon fee: https://www.youtube.com/watch?v=TEBj376woHk - https://www.climateimpact.com/news-insights/insights/climate-calculus-series-whats-the-right-price-for-carbon/	General	Climate Impact Partners
We think that these requirements - as opposed to the claim itself - could allow stakeholders to potentially assess whether companies are making meaningful efforts towards achieving their targets. There are, however, some problems. Increased transparency: a welcome step - We agree that these requirements could allow stakeholders to potentially assess whether companies are making meaningful efforts because of the increased transparency regarding actions taken towards scope 1 and 2 targets and to tackle the obstacles to scope 3 emission reduction. This transparency requirement is a welcome development, but the question of whether or not stakeholders can reliably assess meaningful action, i.e. credible decarbonisation commitments, is dependent on whether or not these stakeholders are able to process this information and make sense of it. One major flaw we see is in the ability for companies to set their own decarbonisation pathways, which might include a significant rise in emissions in the short-term. Companies could communicate that they are "on track€ to meeting their scope 3 targets, which most people will interpret as meaning that they are reducing their absolute emissions, when in reality their emissions are rising. Option to use intensity targets: an unwelcome step - VCMI should not allow companies to set intensity targets and should require companies to only set absolute targets. The key problem with intensity targets is that they may not lead to a decrease in overall emissions, so stakeholders may not be able to properly assess whether a company has made meaningful efforts to meet their targets. A company who sets intensity targets and uses the Scope 3 Claim can therefore easily mislead stakeholders who won't be able to differentiate between companies who are making meaningful efforts and those who are not, i.e. the laggards. 2038 timeline too late - If companies are only required to "phase out carbon credit use to make the Scope 3 Claim, no later than 2038€, stakeholders will not be able to differentiate between those companies who are making meaningful efforts and those who are not. The 2038 phase-out date is one of the key problems with the Scope 3 Flexibility Framework because it permits companies to use large	General	Carbon Market Watch

Comments (compiled)	Section of the Claim	Respondent name/ organisation
volumes of credits for an extended period of time before they have to return to their science-aligned decarbonisation trajectory. In other words, companies would be allowed to pollute more than their annual decarbonisation target - for scope 3 - by 24% until the phase-out date.		
P.16 and 17 of the Guidance offers a generally balanced text and substantial requirements that actually make it challenging for companies to take the Scope 3 claim lightly -- the level of disclosure on barriers and remediation plans is demanding enough so that a Scope 3 Claim effectively becomes a fallback position for a company that had set its mind to reaching higher integrity claims (Silver, Gold, Platinum). Companies should be pursuing Scope 3 Claims as part of their overall corporate net-zero strategy, which should be embodied in a transition plan. The current wording of the guidance does not provide sufficient context to make it clear whether companies are pursuing an ad hoc Scope 3 strategy or if these activities are part of an overall corporate emissions reduction strategy. The guidance should make it clear that the expectation is both a science-aligned target and a transition plan that lays out the strategy to achieve that target. A key component of a corporate transition plan is to identify interdependencies (e.g., need for new technology, revised government policies, additional financing) that if not addressed could become barriers to achieving the emission reduction target. The transition plan lays out targets and strategy for Scopes 1-3, and provides the context for reporting on progress made, assessing whether a company is on track, and should be updated to reflect a change in strategy needed to address any emissions gap. Please take note of the suggestion above of allowing the use of carbon credits up to 24% maximum scope 3 emissions gap limit for a so called scope 3 claim', and address any additional carbon credits purchased outside the value chain as a separate claim. Text could be amended to reflect this suggestion. None	General	Center for Climate and Energy Solutions
No comment.	Step 4	Invert
I this is right thinking in the right direction None	Step 4	BEKSOLAR VENTURES
In order to instil trust and confidence in the integrity of Scope 3 Claim framework and the credit retirements made via the framework, the inclusion of an assurance mechanism is essential. FincoEnergies therefore supports this requirement.	Step 4	FincoEnergies
If a company purchases carbon credits for contribution claims or for its residual emissions when it comes to that point, these need to be third party verified. These need to be reported separately from the rest of a companys GHG inventory and not be part of a companys transition pathway.	Step 4	ECOS

23 Policy/ regulation

Comments (compiled)	Section of the Claim	Respondent name/ organisation
it's unclear how this mechanism will be enforced. Are there penalties for failing to meet the stated reduction goals or relying too heavily on carbon credits?	General	Hatem Ali
1. The Core methodology for the Claim Penalties/Incentives: Introduce penalties or incentives for companies that fail to meet intermediate targets. For example, if a company's Scope 3 emissions gap exceeds a certain percentage at a specific time point (e.g., 2028 or 2033), they could be required to purchase additional credits or take immediate corrective action. These revenues should go directly in sector-related capital pools that unlock abatement technologies specific to those unable to meet targets and scale technologies more quickly. A body would need to be decided as to how these might be managed, ideally an existing body.	General	Seagrass Ltd
We support the endeavours and purpose of the Scope 3 claim. In particular, we support the use of carbon credits to compensate for hard-to-abate 'residual' emissions within Scope 3. However, to improve credibility and desirability of the claim we provide the following recommendations: · Appetite of corporates to use the guidance will highly depend on corporates receiving either reputational benefit or incentives for achieving/maintaining the claim. At this current time, we do not expect the VCMI claim in isolation will be sufficient and will rather need recognition by other programmes (e.g. CDP/SBTi) or policy & regulation to encourage uptake. Accordingly, the guidance may benefit by a clear ambition and/or engagement strategy to support it. For instance, the US Government announced earlier this year that they recognise compensation of residual emissions within Scope 3 as an appropriate use case for carbon credits[1]. Receiving support/endorsement from the likes of the US Government (and other entities that recognise Scope 3 compensation as an appropriate use case for carbon credits) would almost certainly help build momentum behind the claim/guidance. [1] U.S. Department of the Treasury Releases Joint Policy Statement and Principles on Voluntary Carbon Markets | U.S. Department of the Treasury	General	Drax
The guidance should have very clear rules on the claims and labels that companies can (and cannot) use when marketing themselves in accordance with the guidance. This should pay due regard to the EU Green Claims Directive and other relevant greenwashing regulation	Step 4	Drax

24 Procurement guidelines

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Step 2: Meet the Scope 3 Claim requirements Regarding the recommendation to disclose guidelines for the retirement of carbon credits by companies that wish and are able to offset Scope 3 emissions: we agree and see great potential to promote more credible carbon markets and reduce integrity risks that undermine the market and affect the credibility of a market with the potential to combat the climate emergency.	Step 2: Meet the Scope 3 Claim requirements	Carbonext
Please see above comments for feedback on this section. Additionally, while we welcome an optional recommendation that companies disclose details on carbon credit procurement strategy and priorities, and/or disclosure on how carbon credits are ultimately selected, we do not support requiring the companies disclose the company's full carbon procurement strategy or guidelines. We support a reasonable amount of transparent disclosure, and while sending clear market signals to the VCM is welcome, disclosure of all elements of procurement decisions is unnecessary and increases the burden of reporting.	Step 2: Meet the Scope 3 Claim requirements	Anew Climate
While we welcome an optional recommendation that companies disclose details on carbon credit procurement strategy and priorities, and/or disclosure on how carbon credits are ultimately selected, we do not support requiring the companies disclose the company's full carbon procurement strategy or guidelines. We support a reasonable amount of transparent disclosure, and while sending clear market signals to the VCM is welcome, disclosure of all elements of procurement decisions is unnecessary and increases the burden of reporting.	Step 2: Meet the Scope 3 Claim requirements	Rubicon Carbon
A company's carbon credit procurement guidelines should not rely on binary quality initiatives as their only measure of the effectiveness of carbon credits. Project-level risk-based ratings can provide a nuanced understanding of the varying levels of risks between projects. Using a quantified risk score, BeZero Carbon proposed a portfolio approach using "risk-adjusted tonnes" as the basis of making a credible claim in the linked White Paper, "Making Credible Claims" https://bezerocarbon.com/insights/making-credible-claims	Step 2: Meet the Scope 3 Claim requirements	BeZero Carbon
While we welcome an optional recommendation that companies disclose details on carbon credit procurement strategy and priorities, and/or disclosure on how carbon credits are ultimately selected, this should not be made mandatory.	Step 2: Meet the Scope 3 Claim requirements	Climate Impact Partners
We support disclosure of a company 's carbon credit procurement guidelines	Step 2: Meet the Scope 3 Claim requirements	Drax
We support the recommendation to develop and disclose carbon credit procurement guidelines. By outlining their criteria for selecting carbon credits, companies can demonstrate their commitment to responsible and impactful carbon offsetting. This	Step 2: Meet the Scope 3 Claim requirements	Carbonplace

transparency can help to build trust with stakeholders and ensure that carbon credits are used effectively to support climate mitigation efforts.		

25 Reputational

Comments (compiled)	Section of the Claim	Respondent name/ organisation
If companies can have faith that their carbon credits accounting is recognised by a reputable standard they are more likely to make that investment. The more companies are incentivised the better it is for their and the economy's decarbonisaiton. No.	General	Mundys
We disagree that Scope 3 Claim requirements enable stakeholders to effectively assess whether companies are making meaningful efforts to achieve their targets. While the intention behind these requirements is commendable, the fundamental issues with Scope 3 emissions measurement render them inadequate for providing a clear picture of a company's true climate impact. Please see our earlier responses. As outlined in previous responses, we respectfully disagree with the premise of the Scope 3 Claim as a meaningful basis for accountability. Please see our earlier responses.	General	E-liability Institute
We welcome the inclusion of high-quality carbon credits to cover the scope 3 emissions gap, but wish to highlight the importance of reducing emissions overall as a first step, and ensuring the claim is not misused for the basis of corporate greenwashing. We further wish to highlight the encouragement of immediate action, and the importance of corporate responsibility for the not yet reduceable emissions, rather than waiting for perfect solutions. However, this claim, as such, does not contribute to corporates meeting set reduction targets, but rather to take responsibility for taking wider action, while working to overcome barriers to reduce scope 3 emissions overall.	General	Anonymous
Overall, we do not support the Scope 3 Claim as it is written, as it allows companies to depart from their science-aligned decarbonization trajectories, and do so for a very long time.	General	Libby Blanchard
the Scope 3 Claim allows companies to pollute greenhouse gas (GHG) emissions more than their annual target up to 24% of trajectory emissions each year until 2038. This overshoot of 24% per year starkly contrasts the necessary reduction rate of 4-5% per year needed between 2020 and 2030, and approximately 7-8% per year beyond 2030, to meet the Paris Agreement's goal of limiting warming to 1.5°C (IPCC 2018). Allowing companies to increase their scope 3 emissions by up to 24% of their scope 3 trajectory emissions is out of alignment with near-term targets. If a significant number of companies use this claiming path instead of reducing their indirect emissions, the VCMI Scope 3 Claim would significantly undermine effective global climate mitigation action. Further, allowing companies to make a Scope 3 Claim	General	Libby Blanchard

Comments (compiled)	Section of the Claim	Respondent name/ organisation
while polluting in excess of their annual decarbonization target by up to 24% will result in greenwashing accusations and a real risk of misleading consumers and investors into thinking companies are decarbonizing, and doing so more ambitiously than is actually the case.		
whether a financial tool can be used towards inventory is down to relevance. if it is not relevant, then it cannot count. suggesting otherwise could be seen as promoting false or misleading claims.	General	Anonymous
The terminology of the claim would be important; if it could be interpreted as an offsetting claim, it would be misleading. If the claim would imply a form of contribution, then it would raise the question why this is any different to the existing set of VCMI's Silver, Gold and Platinum contribution claims.	General	Anonymous
Well established standards and guidelines such as the UN HLEG, SBTi Corporate Net Zero Standard and ISO IWA 42 'Net zero guidelines' do not permit credits to be used within a companys value chain on its net zero pathway, regardless of the emission gap between its set targets. If the VCMI permits companies to use carbon credits, it risks damaging its own credibility but also that of the company. For companies to be credible, they should demonstrate direct investment in Scope 3 emission reductions.	General	ECOS
We urge VCMI to reconsider the proposal in this paper, as it risks the reputation and credibility of VCMI and a company that decides to use it.	General	ECOS
Please see our arguments above. The claim is unworkable, bordering on fraudulent. A credible solution would involve a transformative shift toward sound carbon accounting principles, such as the E-liability and E-asset framework. Please do not hesitate to contact us if you have questions or seek any clarifications on this submission. We are academics who seek to bring our expertise in accounting, auditing, and market operations to solve this great global challenge, and we remain at your service.	General	E-liability Institute
A credible approach. Strikes the right balance, and clear demonstration against greenwashing in the voluntary carbon market accusations. The word 'Claim in this 'Scope 3 Claim could be confusing as a title for this initiative [Claim for what? Linked to what? Connection with SBTi? Etc.} Perhaps naming it 'BVCM for Scope 3 Net Zero would be better and resonate with SBTi Net Zero standard.	General	Sopra Steria Group

Comments (compiled)	Section of the Claim	Respondent name/ organisation
Yes, we believe the claim has the potential to encourage companies that currently do not dare to engage in carbon credit purchases, due to reputational risks relating to carbon credit use by companies that are not fully science-aligned, to engage in carbon credit purchases in a manner that reduces risks of greenwashing accusations. We see that companies that are not on track to meeting their science-based targets face a reputational risk in using carbon credits that undermines carbon credit demand and, consequently, private finance for additional mitigation. The adequacy remains to be seen but we support learn-by-doing sooner rather than later, even if the initial approach is not perfect. No further comments.	General	Perspectives Climate Research
The Scope 3 claim as presented is a mechanism by which an organisation can take additional responsibility over the shortfall in achieved Scope 3 reduction compared to the target. It should be made very clear up front that this claim is not a mechanism to loosen reduction requirements, nor to 'permit' them to fall behind their emissions target, nor use carbon credits to achieve their reduction goals - but in fact go above and beyond to recognise that they are behind their science aligned target and avoid or remove the equivalent carbon.	General	Climate Impact Partners
There is a wholely inadequate understanding of what it takes to reach Net Zero. Far too many believe signing a renewable energy contract and buying electric vehicles is enough. However renewables are not carbon free. The purchase of theoretical carbon credits should be illegal - it is a greenwashing exercise used to excue the continued waste of energy. We need more to follow the lead of Easyjet who abandoned carbon credits as they could see greater carbon reduction when spending the cash on carbon savings. Carbon footprints must be changed to acknowledge the higher of actual or average gCO2/kwh. - for every wasted kwh of low carbon renewable we force someone else to depend on fossil fuels. When I prepared for moderating a panel debate about wind power I could see the UK report an average of 71gCO2/kwh yet we were importing 3% of our energy from the Netherlands at 384g/CO2/kwh. We have no control over the carbon of imported energy. Arguably we should report it as their maximum. We MUST do far more to avoid the need for energy - if we reduced demand by 3% we would have no need to import from the Netherlands and could show an immediate 20% saving in average gCO2/khw. the idea that Scope3 emissions can be reduced to the levels suggested is laughable - without some real help for those of us with better than net zero solutions we can never get anywhere near a genuine Net Zero. Many herbs and salads cost more to deliver than to grow. Cash and carbon go very much hand in hand - avoid one and you automatically reduce the other. We MUST stop the growing, packing and delivery of food we know will be wasted. Tesco suggested 60% of bagged salads are not consumed. They will have come from a grower who has paid to create ideal growing conditions and, after following a tortuous cash and carbon expensive supply chain end up at many buildings that already pay to dump perfect conditions for a greenhouse. https://cityfarmsystems.com were nominated by US based Impact Entrepreneur for this year's Earthshot Prize as they show how to take advantage of this and use the building's Scope 1&2 emissions to avoid 99% of related Scope3. They can despatch 1kg of seed and hand 1tonne of produce to the end user building as needed over a period of time. Vertical farms do no more than replicate the potato crisp supply chain swapping the crisps for perishable salad	General	City Farm Systems

Comments (compiled)	Section of the Claim	Respondent name/ organisation
leaves. A truck can deliver 26 tonnes of potatoes - but only 1.3 tonnes of crisps and vast amounts of single use packaging that we also need to avoid. Distributed growing addresses many of the SDGs in ways others can only dream of. See notes above - your starting point is hopelessly inadequate. We need to start by recognising just how difficult it is to achieve Net Zero without substantial change by all. The government should move away from their vindictive jealousy of private education and make real changes. Rather than add VAT to education they should put parent car exclusion zones around every school. There are far too many schools where parents add 20-30 minutes to every passing vehicles journey times during school terms. The time, congestion and pollution savings would be significant for everybody and this is literally a case of the polluter pays.		
WWF sees some positive elements in the proposed design of the scope 3 claim, but on balance does not think it is a useful contribution to corporate efforts, because especially in light of the efforts elsewhere (including in SBTi) to allow offsets as a substitute for in value chain actions, there is a very high risk that this claim will have the effect of increasing the appeal of offsetting and reducing corporate efforts to decarbonize the company's own value chain.	General	WWF
The methodology in itself is misleading and risk leading to mitigation deterrence and greenwashing. The emission trajectory presented is inconsistent with the mitigation hierarchy and lacks credible scientific reasoning. In addition, both the emission trajectory and the carbon budget methodology affect the transparency and integrity of the whole proposal, as well as risking a companys own integrity and credibility. See Chapter 2 on IPCC report Mitigation Pathways compatible with 1.5 https://www.ipcc.ch/sr15/ We find the methodology itself that is problematic, not the formatting of the text.	General	ECOS
Important clarification to be made: It could be interpreted that the Scope 3 Claim is intended to be a flexibility mechanism to address scope 3 value chain emissions among companies that are on their way to meeting their interim scope 3 targets, while the interim target has to be met. This is what is illustrated in graphics pages 21 and 23 of the guidance. Or is VCMI's Scope 3 Claim allowing companies to make a scope 3 claim at t(y) = t(interim target year)? Please clarify this point as the latter would have stronger reputational implications.	General	Center for Climate and Energy Solutions
We urge VCMI to reconsider the proposal in this paper, as it risks the reputation and credibility of VCMI and a company that decides to use it.	General	ECOS
The text focusses on the integrity of the carbon offset which is important to ensure the credit is indeed legit and does not lead to double counting or greenwashing. The ICVCM CCP are comprehensive and safeguard the carbon removal's integrity.	General	AHDB

Comments (compiled)	Section of the Claim	Respondent name/ organisation
FincoEnergies supports the claim requirements. However again, FincoEnergies urges VCMI to strike a balance between requirements support integrity with the barriers/hurdles these can present to companies in participating in the Scope 3 Claim System. This is particularly pertinent at these early stages of development of the Scope 3 Claim when there should be a strong focus on encouraging and maintaining participation in the framework.	General	FincoEnergies
[Disagree]The requirements presented do not necessarily enable transparent assessment. As Scope 3 Claim gives the option for a company to report Scope 1 and 2 reductions through an intensity basis, this method does not actually guarantee emissions to be reduced, as the emissions are measured relative to a company's output (i.e. per unit of product, revenue). A company may be reducing its emissions per unit of production, but may increase the actual production overall, leading to the increase of absolute emissions, thus not being aligned to 1.5C nor providing accurate GHG accounting. The aim of a standard is to harmonise practices and to ensure comparability between users of the standard. he VCMI Scope 3 Claim does not provide clear guidelines for what constitutes a valid barrier for companies nor what is sufficient for a company to demonstrate meaningful commitment, this leaves too much to the discretion of the standard users. It may risk companies to self-define barriers in a way that may delay taking responsibility for emissions that are within their influence. Moreover, it may risk mitigation deterrence, by not having a clear threshold of what is a clear, demonstrable commitment to Scope 3 reduction. The value of companies disclosing their emission gap will also depend on how and where companies are required to disclose it. Moreover, the VCMI proposal does not clearly define how this would affect companies communications related to their targets validated by the Science Based Targets initiative (SBTi), and what is the specific terminology of the Scope 3 Claim that companies can use. we urge VCMI to reconsider the proposal in this paper, as it risks the reputation and credibility of VCMI and a company who decides to use it.	General	ECOS

26 Scope 1 and scope 2 targets

Comments (compiled)	Section of the Claim	Respondent name/ organisation
It is not understandable why this calculation is only required for scope 3 but not for scope 1 and 2. It is recommended to include the same calculation method for scope 1 and 2 and that for both cases no gap is allowed to achieve any VCMI claim.	Step 3: Meet the required carbon credit use and quality thresholds	Javier Castro
It should be clear the companies that have a scope 3 gap will never be able to achieve gold or platinum level. Also companies that have a gap on stop 1 or 2 should not be allowed at all to get a scope 3 claim.	Step 2: Meet the Scope 3 Claim requirements	Javier Castro
Information regarding scope 1 and 2 progress should be always obligatory with quantitative evaluation to assure that no material deviation is occurring which will be difficult to overcome.	Step 2: Meet the Scope 3 Claim requirements	Javier Castro
1. We consider the introduction of transparency about "emissions gaps" in scope 3 to be a key step forwards for the climate accountability ecosystem. To require companies to disclose trajectories for their progress between base year and scope 3 targets, and to set guardrails on those trajectories, is a very helpful development. 2. We assume that a company that has not reduced its scope 1 and 2 emissions will not be able to meet the step 2 requirements. a) Assuming this is the case, we think this should be stated clearly in the documentation. b) There is an outstanding question about what constitutes sufficient scope 1 and 2 reductions to fulfil the first step 2 requirement. For instance, is 0.5% reduction sufficient? Or must the progress be "on track" towards near-term targets, following, for example, an assumed straight line trajectory from the baseline? c) Another outstanding detail is whether the progress has to be consistent from base year to most recent year, or whether there can be years in between in which scope 1 and 2 emissions rose or were above the planned trajectory. 3. For companies that are getting started and that setting their baselines there could be some perverse incentives around using market-based accounting for scope 2. This arises because companies are able to show very steep reductions in market-based energy figures if they use market-based figures for target-setting and set the baseline before starting to use market mechanisms. We have seen cases where this kind of practice could be suspected.	Step 2: Meet the Scope 3 Claim requirements	Claire Wigg
Since transformations must happen at systems level, we need transparent communication by many companies within sectors, value chains and countries, about the barriers they face, to prompt collective action by a wide range of stakeholders. Some similar	Step 2: Meet the Scope 3 Claim requirements	Claire Wigg

Comments (compiled)	Section of the Claim	Respondent name/ organisation
principles could be applied to assessing progress towards scope 1 and 2 targets as are being suggested for assessing progress towards scope 3 targets (ie straight line trajectories or better).		
We strongly recommend that VCMI require companies to actually reduce their scope 1 and 2 emissions by about 4% (i.e. a science-aligned pathway), in addition to publicly disclosing their percentage of emissions reductions achieved.. Requiring a 4% annual reduction in the near term, in alignment with the Paris Agreement goals, would ensure that companies are on track with their scope 1 and 2 emissions to meet their near-term science-based targets and significantly increase the rigor and ambition of the Scope 3 Claim.	Step 2: Meet the Scope 3 Claim requirements	Libby Blanchard
It also needs to be extended to allow for Scope 1 and 2 claims.	Option boxes	RWEST
There should be an incentive for companies to consider still covering a part of their scope 1 and 2 emissions with carbon crediits, as with the platinum, gola and silver claim.	Step 3: Meet the required carbon credit use and quality thresholds	ClimatePartner
In addition, there should be an incentive provided to still cover a share of the remaining on-track scope and 2 emissions with carbon credits.	General	ClimatePartner
VCMI should consider allowing companies facing challenges in addressing Scope 1 and 2 emissions (i.e. cement and steel) to also make a similar claim to the proposed Scope 3 claim, recognizing that their challenges they face are comparable to those faced by companies included in the scope of the Scope 3 framework. NA	Step 2: Meet the Scope 3 Claim requirements	The Nature Conservancy
No further comments. Only the responses to the survey questions. Companies are required to: • Publicly disclose the percentage of emissions reductions achieved in GHG emissions for scope 1 plus scope 2 in the most recent reporting year in comparison to the scope 1 plus scope 2 GHG emissions reported in the base year (i.e. base year used in the near-term target).These reductions must be demonstrated on an absolute basis.	Step 2: Meet the Scope 3 Claim requirements	Carbon Market Watch
Neither agree nor disagree. The first requirement, demonstrating progress toward Scope 1 and 2 emissions reduction targets, does not seem adequate enough to assess whether a company is making a meaningful effort. Particularly, "demonstrating progress" is loosely defined. VCMI should consider if a clearer and more demonstrable sign of progress must be met for companies to pursue a Scope 3 Claim. However, VCMI should also take care not to too narrowly define the term as to prohibit or discourage participation from a wider field of participants.	Step 2: Meet the Scope 3 Claim requirements	American Forest Foundation

Comments (compiled)	Section of the Claim	Respondent name/ organisation
· Broadly-speaking, we support the requirements and recommendations. However, we have two specific additional recommendations: 1. Progress towards emission reductions should be stated in a manner consistent with short-term emission reduction targets (i.e. if absolute emission targets are set, then emission reductions should at least be reported as absolute, with intensity optional)	Step 2: Meet the Scope 3 Claim requirements	Drax
This is a creative and credible approach that can be applied for on-ramp guidance. For example, could it also be applied to Scope 1 and 2 emissions. Consider applying the linear trajectory towards on-ramp guidance	Step 3: Meet the required carbon credit use and quality thresholds	Anonymous