



**Publication Date:**  
10/02/2026

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# M002 and v1.3 Public Consultation Digest

## Summary

This document summarises the feedback received during the public consultation on the Equitable Earth Programme Manual, v1.3, the Equitable Earth Standard, v1.3, and the M002 Methodology for Terrestrial Forest Conservation conducted from August 21 to September 20, 2026. It presents a summary of all stakeholder inputs and Equitable Earth's responses, highlighting how the feedback has informed updates to the Programme Manual, Standard, and methodology documents.



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# 1 Executive Summary

Equitable Earth conducted a public consultation from August 21 to September 20, 2026 to gather stakeholder input on proposed revisions to the Equitable Earth Programme Manual and Standard, and the new M002 Methodology for Terrestrial Forest Conservation. The consultation was designed to ensure that Equitable Earth's approach to conservation is technically robust, operationally practical, and aligned with market expectations and stakeholder needs.

Overall, the consultation generated substantial and constructive engagement, with respondents providing detailed, experience-based input across a wide range of topics. Feedback was broadly aligned in identifying areas where clarification, simplification, or additional flexibility were needed, while overall supporting Equitable Earth's approach to conservation.

The feedback received directly informed the final versions of the documents, which include clarified benefit-sharing requirements, streamlined stakeholder engagement processes, strengthened permanence safeguards, and improved alignment across methodologies. Where suggestions could not yet be integrated, they have been documented and incorporated into Equitable Earth's research and development roadmap for future updates.

This digest provides a transparent account of the feedback received and Equitable Earth's responses, demonstrating how stakeholder input shaped the updates to the Equitable Earth Programme and supported the launch of the M002 methodology.



## 2 Stakeholder Feedback

### 2.1 Methodology

#### Methodological deviations

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Concept: Methodological deviations from core requirements are not currently allowed, but additional flexibility may be needed.

Consultation Question: Are there methodological areas where more flexibility may be needed beyond the current provisions? If yes, specify which areas and why.

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#### Stakeholder feedback summary

Respondents generally agreed that the requirements related to methodological deviations are sufficient. Some respondents highlighted areas where additional flexibility could support innovation, project feasibility, and learning.

Even though jurisdiction-specific risk maps are centrally developed by Equitable Earth to allocate project-level baselines, some developers requested the ability to propose alternative risk maps if they can demonstrate that Equitable Earth's maps inadequately reflect local conditions.

Some respondents highlighted challenges related to project start dates and the timing of Free, Prior, and Informed Consent (FPIC). Some projects have FPIC documentation that is more than three years old, and respondents suggested either allowing deviations from the start date requirements or granting extensions to the three-year submission deadline. This flexibility would enable otherwise eligible projects to participate even in complex local contexts, including where consultations with Indigenous Peoples & Local Communities (IPs & LCs) require extended time. Some respondents also recommended a fast-track deviation procedure for projects operating in conflict-affected or shock-prone areas.

Finally, while the exclusion of deviations from core requirements, such as baseline allocation, additionality, and eligibility criteria, was broadly supported, respondents requested clearer definitions of 'core requirements.'

#### Equitable Earth response

In response, Equitable Earth has removed the 'Methodology Deviations' section from M002, and all deviation requirements and procedures are consolidated within the Programme Manual. Deviation requests must be clearly justified and are considered



on a case-by-case basis. This approach preserves simplicity, avoids confusion, and allows Equitable Earth to respond appropriately to accommodate innovative monitoring approaches, complex local contexts, or exceptional circumstances, without compromising environmental integrity.

## Baseline re-evaluation period

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Concept: Baselines are re-evaluated every six years, providing stability for project planning but may reduce accuracy compared to more frequent updates.

Consultation Question: Which baseline re-evaluation period do you believe best balances stability and accuracy (e.g., six years, three years, annual updates, other)?

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## Stakeholder feedback summary

Respondents generally supported the proposed six-year baseline re-evaluation period, emphasising that this interval avoids the operational and financial burden associated with more frequent reassessments, particularly in complex or resource-constrained contexts.

Several respondents noted that improvements in remote sensing, data availability, and modelling may justify shorter cycles in the future. Respondents also highlighted the importance of aligning baseline re-evaluation with adaptive management frequency to reinforce consistency in monitoring, decision-making, and support more efficient and coordinated information updates.

## Equitable Earth response

In response to this feedback, and to ensure coherence across the Standard's monitoring requirements and architecture, the Secretariat has aligned the baseline re-evaluation period and adaptive management cycles. The baseline re-evaluation period was reduced from six to five years, and the adaptive management period was increased from four to five years.

This adjustment strikes an appropriate balance between methodological stability and the need to adjust assumptions as new information becomes available. Equitable Earth has sought to preserve predictability by retaining a single, uniform interval rather than introducing variable project-selected timeframes.

## Non-permanence and buffer pool contributions



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Concept: A fixed 20% deduction of verified GHG reductions is currently applied at the time of issuance, ensuring conservativeness, simplicity, and consistency across projects.

Consultation Question: Do you agree with a fixed 20% deduction for buffer contributions? If not, what alternative approach would be most appropriate?

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## Stakeholder feedback summary

Respondents broadly recognised that a uniform buffer contribution requirement offers clarity and operational simplicity, many respondents felt that it does not adequately reflect the significant variation in non-permanence risk across geographies, governance contexts, and project types. Several contributors noted that a fixed value may be overly conservative for projects operating in stable, well-managed contexts, yet insufficient for those facing systemic risks such as fire, illegal extraction, tenure disputes, or political instability.

Across responses, there was strong interest in moving toward a risk-adjusted buffer model—either as an alternative to, or phased evolution from, the fixed 20% deduction. Respondents suggested that risk-based contributions should be grounded in transparent, standardised, and independently verifiable criteria, and many proposed that demonstrated risk-mitigation measures (such as fire management, tenure improvements, or community patrol systems) should be recognised through proportionally lower buffer requirements over time. Others emphasised that any dynamic system should recompute risk at each verification and include mechanisms for both step-ups following adverse events and step-downs following durable improvements.

## Equitable Earth response

Equitable Earth appreciates the depth of feedback received on the proposed fixed buffer contribution. Respondents broadly agreed on the importance of a robust, transparent, and evidence-based system for addressing non-permanence risk

In this version, Equitable Earth has not modified the existing fixed buffer contribution. Respondents' recommendations align closely with work already underway within our research and development (R&D) programme to strengthen and expand the Equitable Earth risk-assessment framework. This includes adapting the current risk-assessment procedures and establishing a risk-based buffer approach that can be consistently applied across restoration and conservation methodologies.

Given the complexity and the need for strong empirical testing, this work requires additional time to ensure methodological rigour and alignment and compatibility with our current monitoring and reporting structure. The Secretariat confirms that a more



comprehensive risk-based buffer architecture is planned for inclusion in subsequent methodology updates.

## Project activity emissions

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Concept: Emissions from project activities must be accounted for and reported by developers when they are material.

Consultation Question: Which project activity emission sources are relevant in your project(s) (i.e., biomass burning, livestock grazing, synthetic fertiliser use, other)? How do you currently quantify them?

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## Stakeholder feedback summary

Respondents broadly confirmed that the main categories of project emissions identified in M002 (i.e., biomass burning, livestock grazing, and synthetic fertiliser use) accurately reflect the emission sources most commonly encountered in REDD+ projects.

Respondents emphasised that the presence of these sources does not imply materiality, and they expressed strong support for the materiality-based approach in the methodology.

Developers identified several additional emission sources that could be considered, including fossil fuel use in project operations, invasive species removal, soil organic carbon losses, forest concession management activities, and the use of natural or organic fertilisers.

## Equitable Earth response

Following respondent feedback and in the interest of internal consistency, Equitable Earth will now centralise the implementation of the materiality assessment and the calculation of project activity emissions to ensure a consistent and comparable accounting approach across all projects. Developers will continue to provide the necessary input data required to estimate project activity emissions.

However, the broad 'other sources' category has been removed from M002 to avoid ambiguity. The additional emission sources identified through consultation (i.e., fossil fuel use in project operations, invasive species removal, soil organic carbon losses, and forest concession management activities) have been noted and incorporated into our R&D roadmap for consideration in future methodological updates.



## Peatlands

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Concept: Avoided emissions from peatland rewetting or conservation are not currently eligible but are planned for inclusion in a future version.

Consultation Question: If your project involves peatlands, what share of the area do they cover, and how important is their eligibility for your project?

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### Stakeholder feedback summary

Nearly half of the respondents categorised as developers reported that considering avoided emissions from the rewetting of peat soils and from the conservation of peat from unplanned conversion is relevant for their projects, particularly for projects located in Southeast Asia (especially Indonesia and Myanmar), the Congo Basin, and parts of the Amazon and Orinoquía regions (Peru, Colombia, and Brazil). Some respondents highlighted the high mitigation potential of peatlands and the risks associated with their current exclusion from the methodology, noting that for some developers, especially those operating in Indonesia and parts of the Congo Basin, the exclusion of peatland would considerably limit their ability to use the methodology. Even where peatlands are not currently central to project design, many respondents highlighted their strategic significance for future initiatives and broader landscape-level climate benefits.

Respondents expressed strong support for a clear, near-term roadmap for peatland integration in the methodology. They also underlined the need for safeguards to prevent project activities from generating credits associated with peat or soil emissions while peatlands remain outside the scope of M002.

### Equitable Earth response

Activities leading to avoided emissions from the rewetting of peat soils and from the conservation of peat from unplanned conversion are not included within the current scope of M002.

However, the feedback received clearly demonstrates both their relevance across several regions and their mitigation potential. In line with this, peatland integration has been formally incorporated into Equitable Earth's methodological R&D roadmap for inclusion in future updates, including the potential development of a dedicated module or complementary methodology.

## Additional carbon pools



Concept: Currently, only woody above-ground biomass (AGB) and below-ground biomass (BGB) are included. Future versions may expand to additional pools.

Consultation Question: Do you consider additional carbon pools beyond woody AGB/BGB (e.g., soil organic carbon, dead wood, litter, non-woody biomass) to be significant for accurate accounting? If yes, which pools are most relevant for your project?

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## Stakeholder feedback summary

Respondents indicated that soil organic carbon (SOC), dead wood and non-woody aboveground biomass were considered important by 88%, 47% and 41% of respondents, respectively. Litter was noted as relevant by 30% of respondents.

## Equitable Earth response

Equitable Earth acknowledges the importance of including additional carbon pools, including SOC, dead wood, litter, and non-woody biomass, as highlighted by respondents. This feedback will inform our ongoing R&D for future methodology updates.

## In-situ data collection and monitoring

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Concept: Developers are not required to conduct field data collection for baseline setting or monitoring, except for the measurement and monitoring of project activity emissions (when material), and livelihoods and ecological condition indicators. This reduces burden and ensures standardisation, though in-situ data collection may still be valuable in certain contexts.

Consultation Question: How important is in-situ data collection (e.g., field plots, community monitoring) for your project(s), and in what situations should it be required or encouraged?

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## Stakeholder feedback summary

Respondents strongly supported the use of in-situ field data, with 78% of respondents highlighting it as critical for credibility and accuracy. Key applications identified include project-specific socio-ecological monitoring (94%), community engagement (88%), validation of remote sensing data for baseline establishment (77%), and addressing high-uncertainty areas where models may have accuracy gaps (66%).

Several respondents highlighted the importance of a field calibration pathway, noting that it could improve accuracy relative to a broadly applied model.



## Equitable Earth response

Equitable Earth acknowledges the strong support for in-situ field data collection, particularly for socio-ecological monitoring and community engagement. Equitable Earth already requires developers to collect ground data during the field assessment via the Mobile App, which is part of Equitable Earth's Certification Platform, in order to inform the design of project activities and monitor project impacts. While this data is not currently used to adjust carbon calculations or calibrate models, Equitable Earth plans to explore ways to leverage and collect additional field measurements (e.g., using LiDAR) to refine and calibrate remote-sensing-based carbon models in upcoming methodological updates.

## Activity-shifting Leakage

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Concept: A fixed 10% deduction is applied across projects to account for activity-shifting leakage, ensuring consistent and conservative accounting.

Consultation Question: Do you agree with a fixed 10% deduction? If not, what alternative(s) would be most appropriate?

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## Stakeholder feedback summary

Respondents expressed a preference for project-specific or risk-based leakage deductions, with 74% of respondents recommending alternatives for the current fixed 10% deduction, highlighting that a fixed rate may either under- or over-estimate leakage risk.

Respondents highlighted the need for clearer rationale for the 10% value, the potential risk of penalising low-risk projects while attracting higher-risk ones, and the perception that market leakage is not fully captured. Several respondents recommended that leakage be calculated on avoided emissions (i.e., the difference between baseline emissions and actual forest-loss emissions) rather than applying a flat percentage deduction to the baseline in each period.

## Equitable Earth response

Equitable Earth carefully reviewed the feedback regarding the leakage deduction. While many respondents expressed a preference for project-specific or risk-based deductions, Equitable Earth has retained the fixed 10% approach for the current version in order to maintain consistency, simplicity, and methodological stability at this early stage of implementation.



To address concerns about transparency, the methodology now includes a clear empirical justification for the rationale and conservativeness of the 10% value.

In response to technical feedback, we have revised the calculation approach so that the leakage deduction is applied only to the actual avoided emissions resulting from project activities, rather than to the baseline emissions.

Finally, Equitable Earth acknowledges the strong interest in transitioning away from a fixed value toward a more risk-responsive or project-specific deduction. Future versions will evaluate whether sufficient evidence, jurisdictional data, and analytical tools are available to support a more differentiated approach without compromising methodological integrity.

## Community-based approach to REDD+

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Concept: Equitable Earth aims to support community-led projects, with IPs and LCs at the core, and considered restricting eligibility to projects that involve them.

Consultation Question: What does ‘community-led’ mean to you in the context of REDD+, and how should projects without communities in or near the project area be handled?

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## Stakeholder feedback summary

Respondents broadly agreed that ‘community-led’ projects must reflect real community authority, ownership, and benefit rights. Respondents highlighted three recurring elements that define a ‘community-led’ project: meaningful governance power (often described as majority or decisive voting rights), a substantial share of net revenues, and continuous, well-documented FPIC processes.

Respondents also stressed that ‘community-led’ does not mean consultation or benefit-sharing alone. Respondents highlighted other important dimensions such as data and knowledge sovereignty, participatory monitoring, preferential hiring and procurement for community members, and adequate capacity-building to enable communities to lead implementation and oversight.

On the question of how to treat projects without communities in or near the project area, developers first asked for clarification on what Equitable Earth defines as a community ‘near’ the project area. Respondents underlined that projects without proximate communities should not be excluded. They should follow a differentiated ‘community-centred’ pathway and adopt measures to expand community participation and benefits over time, particularly in landscapes where communities



may not reside inside or near the project area but are still affected by project activities.

## Equitable Earth response

In response to respondents' feedback, Equitable Earth formally defined stakeholder types (core, direct, indirect, and other) at the Standard-level. The Standard requires that projects with core stakeholders must be co-designed with those stakeholders. Projects without core stakeholders must still follow consultation and engagement requirements.

The definitions of 'direct' and 'indirect' stakeholders provide clarity on engaging communities located in or 'near' the project area, and the Standard is explicit in stating which requirements are applicable to different types of stakeholders.

Finally, Equitable Earth strengthened the rules requiring developers to identify community governance structures and decision-making processes and to engage with communities in line with these structures, in order to support community ownership of projects. FPIC and benefit-sharing requirements have been reinforced to improve robustness and transparency, while preserving flexibility to accommodate different contexts.

## General feedback

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Consultation Question: Please share any overall comments on the methodology document. You may also choose to structure your feedback by section (e.g., Eligibility Criteria, Carbon, MRV, Livelihoods, or Ecological Condition).

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## Stakeholder feedback summary

Respondents provided feedback on a wide range of topics related to the M002 methodology. The summarised input and Equitable Earth's responses have mostly been captured in other relevant sections of this document.

Most respondents requested greater transparency on the risk map development and baseline allocation process, including how Equitable Earth handles accuracy and uncertainty. Respondents requested clarification on the definitions of 'forest' and 'jurisdiction', which are used to determine project eligibility.

## Equitable Earth response

Equitable Earth developed the [Baseline Setting Module](#) to provide additional technical details on baseline calculation procedures and to address uncertainty and accuracy of the risk model used in M002.



Equitable Earth adopted an FAO-based definition of ‘forest’, which is used to determine areas eligible for crediting under M002. Equitable Earth also added a definition of ‘jurisdiction’, and an eligibility criterion requiring projects to be based in at least one jurisdiction.

## 2.2 Standard and Programme Manual

### Project budget reporting and transparency

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Concept: Developers must submit a comprehensive budget, including costs, revenues, and benefit sharing with communities. For transparency, project budgets must be published on the Equitable Earth Registry, though some sensitive financial details may be redacted from the public version. Developers must disclose all benefit and revenue sharing information, including the share allocated to communities.

Consultation Questions:

- How much information from the project budget should be shared publicly to balance transparency and practicality?
- Would you support having both a public version (on the Registry) and a private version (for Equitable Earth and the VVB)?
- Is it reasonable to require evidence that project revenues are proportionally allocated (e.g., a reasonable share to project activities, infrastructure, and overhead, with a set percentage directed to communities)? What practical considerations should be taken into account?

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### Stakeholder feedback summary

Respondents broadly agreed that budget transparency is important for credibility, oversight, and to enable communities to make informed decisions on revenue-sharing arrangements. Most supported the disclosure of high-level information such as major cost categories and community revenue shares, while noting that too much granularity could impact commercial competitiveness or create risks for communities.

Many respondents raised concerns about disclosing absolute financial values or detailed line items, citing potential security risks in certain territories, risks of extortion or undue influence, and conflicts with contractual or government-imposed confidentiality obligations. There was wide consensus that salaries, contractor rates, and comparable commercial details should not be made public. Some developers warned that publishing detailed financial structures could distort negotiations for concessions or land-use arrangements.



There was strong support for a tiered public–private disclosure model, in which standardised high-level budget categories and benefit-sharing arrangements are disclosed publicly, while a detailed version—including sensitive financial data—is provided confidentially to Equitable Earth and validation and verification bodies (VVBs) to enable robust assessment. Respondents emphasised the importance of clearly defining what constitutes ‘sensitive’ information, both to ensure consistency and to avoid inadvertently masking inequitable arrangements.

Respondents noted that revenue-sharing requirements are increasingly governed by national law in some jurisdictions (e.g., Brazil), and stressed that any Standard-level requirements must retain flexibility to accommodate country-specific legal and regulatory frameworks.

## Equitable Earth response

Equitable Earth appreciates the detailed feedback received on financial transparency and the proportional allocation of project revenues. In response, Equitable Earth has incorporated a dual-reporting approach into the Equitable Earth Standard. Developers must submit a detailed budget, including all anticipated expenditures for the next adaptive management period and all projected sources of financing, to Equitable Earth and the VVB for assessment. A simplified version will be published on the Registry, disclosing standardised budget categories and benefit-sharing information while omitting sensitive information. The Standard now includes a clear definition of ‘sensitive information’.

Finally, Equitable Earth has ensured that the financial transparency provisions are sufficiently flexible to accommodate national legal frameworks by allowing developers to adjust or expand the budget categories.

## Adaptive management

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Concept: Projects must undergo an adaptive management process every four years, updating the project design, budget, risk assessments, and other key elements to reflect new information and stakeholder feedback.

Consultation Question: Is a four-year cycle for adaptive management appropriate? If not, what alternative timeframe would you suggest, and why?

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## Stakeholder feedback summary

Respondents were strongly in favour of aligning the adaptive management cycle with baseline re-evaluation, given the impact baselines have on project design and budget. A range of suitable timeframes were recommended, from annual updates to capture



more granular changes, to an upper cadence of 5-10 years to capture more material changes in forest landscapes. Respondents also noted that, if introduced, theory of change models should be revisited as part of the adaptive management process.

## Equitable Earth response

Equitable Earth chose to align the adaptive management process with baseline re-evaluation, with both required every five years. Developers are encouraged to consider and report on changes to project interventions outside of adaptive management cycles in their Annual and Monitoring Reports.

## Grievance mechanism

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Concept: Equitable Earth manages a centralised grievance mechanism to allow stakeholders and community members to raise concerns in confidence at any time, with safeguards in place for confidentiality, accessibility, and protection.

Consultation Question: Do you have feedback on the grievance mechanism requirements? Are there ways to make it clearer, more accessible, or more effective?

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## Stakeholder feedback summary

Respondents broadly acknowledged that the proposed grievance mechanism represents a solid foundation aligned with international good practice.

Respondents highlighted that while the centralised Equitable Earth grievance mechanism is valuable, it must be complemented by a robust project-level grievance mechanism to ensure accessibility, contextual accuracy, and trust. Several respondents noted that many grievances are most effectively resolved at the local level, where communities are familiar with project staff and cultural norms, and have established relationships. Local mechanisms can support community self-reliance, strengthen long-term problem-solving capacity, and provide a more comfortable and trusted avenue for IPs and LCs. Respondents emphasised that the central Equitable Earth channel should function as a complementary or last-resort pathway, particularly once project-level systems are fully operational.

A consistent theme across submissions was the need to expand reporting channels beyond email to accommodate rural, low-connectivity, and low-literacy contexts. Respondents recommended incorporating WhatsApp, voice hotlines, and community-based intermediaries, alongside in-person options facilitated through trusted local actors. Several highlighted that accessibility must extend to local languages, culturally appropriate communication, and proactive awareness-raising to ensure communities understand how and when the mechanism can be used. Multiple



respondents noted the importance of clearer independence in the handling and oversight of grievances, with some requesting explicit non-retaliation protections for complainants and witnesses.

## Equitable Earth response

In response to respondent feedback, Equitable Earth has strengthened its grievance mechanism by implementing a two-tier approach. Projects must maintain a locally accessible and culturally appropriate grievance mechanism, complemented by the centrally-managed Equitable Earth channel for escalated or unresolved cases. Stakeholders may use the Equitable Earth channel at any time.

Accessibility has been further enhanced through the addition of a dedicated WhatsApp number, and Equitable Earth has strengthened its requirements for non-retaliation. All these provisions, including guidance on accessibility, cultural appropriateness, and oversight, have been consolidated in a new document: [Grievance Mechanism Requirements and Procedures](#).

## Submission deadline

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Concept: Developers must submit projects to Equitable Earth within three years of the project start date.

Consultation Question: Is the current three-year submission deadline appropriate for projects? If not, what alternative time frame would work best, and should different activity types have different deadlines?

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## Stakeholder feedback summary

Respondents provided mixed feedback on the appropriateness of a three-year submission deadline. Some respondents shared concerns that projects may not be ready to issue credits until five- to eight-years after the project start date. This was based on operational examples, such as complex legal or land tenure challenges, or the need for extensive community engagement, and economic examples, such as the need for sufficient crediting volumes to balance costs of validation and verification.

Some respondents wanted more visibility on the overall process, with deadlines for validation and verification.

## Equitable Earth response

Equitable Earth clarified in the Programme Manual that the submission deadline refers to the date by which projects must submit initial project information to Equitable Earth (i.e., projects do not need to be validated or verified at that time). The



three-year submission deadline was maintained as it signals the early consideration of carbon finance.

Equitable Earth recognises the need for increased visibility on validation and verification timelines, and provided additional clarity in the Programme Manual and Standard. Transfer projects are not required to submit their project to Equitable Earth within three years of the project start date. Instead, they must have submitted their project to the other carbon crediting programme within three years of the project start date.

## Transfer requirements

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Concept: New procedures were proposed for projects transferring from other carbon crediting programmes to Equitable Earth.

Consultation Question: Do you have feedback on the proposed requirements and procedures for projects transferring from other carbon crediting programmes to Equitable Earth (e.g., clarity, practicality, or overall applicability)?

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## Stakeholder feedback summary

Respondents supported the inclusion of a pathway for projects to transfer from other carbon crediting programmes but highlighted areas where additional clarity would be beneficial. Respondents noted the need for clear rules for the treatment of transfer projects that have already issued credits. This included the management of liabilities associated with the previous programme, including the handling of already issued credits, buffer pool contributions, and any other residual obligations.

Respondents stressed the importance of a streamlined transfer process to avoid duplicative monitoring, reporting, and verification (MRV) processes, or administrative costs, particularly where robust documentation already exists. Several respondents highlighted practical considerations around continuity, suggesting that relevant historical documentation (e.g., raw monitoring data, validation and verification reports, and records of stakeholder engagement) could be transferred to Equitable Earth to ensure transparency and traceability.

Some respondents suggested that Equitable Earth define clear exclusion criteria for transfer projects and the extent to which transfer projects must conform with Equitable Earth requirements at the time of transfer. It was noted that some projects may not be able to comply with all Equitable Earth requirements at the point of transfer.



## Equitable Earth response

In this version, Equitable Earth clarified that credits issued under another programme cannot be transferred or converted into Equitable Carbon Units (ECUs). Developers seeking to transfer must instead address all liabilities under the previous programme, including requesting the cancellation or resolution of any applicable buffer pool contributions, in accordance with the procedures of that programme.

Transfer projects must complete the full Equitable Earth certification process to ensure consistency and comparability across Equitable Earth projects. However, Equitable Earth recognises the potential for unnecessary duplication where projects have already undergone robust validation or verification under equivalent requirements. Equitable Earth confirms that a streamlined 'gap validation' approach may be considered in future updates. Where appropriate, Equitable Earth may apply time-bound, case-by-case grace periods to allow projects to progressively align with Equitable Earth requirements, provided that integrity risks are adequately managed.

More guidance and procedures for projects transferring from other carbon crediting programmes will be included in future versions.

## Project governance and management

### Concept

New requirements were proposed for project management teams to ensure they have the capacity to manage complex projects effectively.

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Consultation Question: Are the proposed requirements for project management teams appropriate across different project types? If not, please explain why. Developers may also comment on whether their current projects and teams would meet these requirements, and share any other feedback on this topic.

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### Stakeholder feedback summary

Respondents recognised the importance of strong project management teams to ensure credibility, technical rigour, and effective community engagement.

Several respondents highlighted that the proposed team composition requirements may be overly prescriptive. Concerns included risks associated with rigid 'one-size-fits-all' requirements, which could inadvertently exclude small, community-led, or early-stage projects; the administrative burden of naming multiple specialists; and potential barriers for Indigenous- or locally-led initiatives that may



rely on rotating leadership, cooperatives, or partnerships rather than fixed in-house teams.

Respondents emphasised that project governance should prioritise functional capacity over formal titles, ensuring access to core functions such as MRV, finance, legal, ecological and biodiversity monitoring, FPIC/respondent engagement, and community development. Flexibility in how these functions are met—through shared services, partnerships, consultants, or local institutions—was recommended. Respondents also highlighted the importance of embedding local and Indigenous leadership, achieving gender balance, and implementing culturally appropriate governance structures.

## Equitable Earth response

Equitable Earth revised the governance requirements to focus on functional capacity rather than formal roles or fixed organisational structures. Developers must demonstrate that the required functions are covered, and the Standard does not mandate how those functions must be distributed across individuals or organisations.

To address concerns about accessibility and proportionality, the Standard now explicitly avoids a one-size-fits-all approach. Projects may meet functional requirements through partnerships, shared-service models, or consortium arrangements, provided these arrangements ensure continuity, accountability, and compliance with Equitable Earth requirements.

## Theory of Change

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Concept: Equitable Earth considered integrating a Theory of Change approach, where projects use causal chains to link activities with outputs, outcomes, and impacts. This approach would provide a more standardised framework for measuring project effectiveness.

Consultation Question: Do you think a Theory of Change is an appropriate tool for developers to measure project impacts? If not, what alternative approaches would you suggest, and do you have any additional feedback based on your experience?

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## Stakeholder feedback summary

Respondents were strongly in favour of including a theory of change approach, provided the theory of change was evaluated during adaptive management and updated to reflect changing conditions. However, respondents highlighted that the Standard already included clear requirements for monitoring and evaluation of project



performance, and that the integration of a theory of change approach should not result in duplicative work for developers.

## Equitable Earth response

Equitable Earth has included a theory of change approach in this version of the Standard. The approach requires developers to outline the logic and assumptions that underpin project design, regularly re-evaluate these elements, and assess the impact of interventions.

Further R&D will be conducted to strengthen the theory of change approach and provide additional tools to support the monitoring and evaluation of project quality and impacts.

## General feedback

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Consultation Question: Please share any overall feedback on the Programme Manual, the Equitable Earth Standard, or the Programme as a whole. You may also choose to structure your comments by area (e.g., ecological condition, stakeholder engagement, FPIC, collaboration with IPs/LCs, Standard, Programme Manual, Programme overall).

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## Stakeholder feedback summary

Equitable Earth received extensive feedback. The key points below are organised by category to highlight recurring themes.

### Livelihoods and stakeholder engagement

1. Several respondents indicated that the livelihoods baseline assessment was too prescriptive, particularly due to the fixed set of baseline attributes. This could limit flexibility for projects operating in diverse socio-economic and cultural contexts.
2. Multiple respondents noted that references to project phases, such as ‘at feasibility’ or ‘at design’, in the requirements created confusion. Respondents recommended focusing on the intent and outcomes of requirements rather than tying them to specific stages of project development.
3. Some respondents raised questions about requiring a formal stakeholder committee, noting that such structures may be unnecessary or inappropriate in certain contexts and could risk bypassing existing customary or community decision-making processes.



4. There was broad agreement that Equitable Earth could improve clarity of terminology related to ‘stakeholders,’ ‘communities,’ ‘Indigenous Peoples and Local Communities (IPs and LCs),’ and ‘neighbouring communities.’ Respondents also requested clearer differentiation regarding which requirements apply to which stakeholder groups.
5. With respect to IPs and LCs, several respondents highlighted opportunities to address intra-community power dynamics, including gender-related inequities, in the Standard, and emphasised the importance of financial and institutional capacity-building to enable equitable engagement. Some also suggested strengthening baseline vulnerability assessments, including potential use of tools such as the IPCC Livelihood Vulnerability Index (LVI-IPCC).

### **Suspended and failed projects**

Respondents requested clearer and more explicit provisions regarding the management of ECUs when projects are suspended or fail. In particular, they stressed that the Standard should further specify whether such units remain valid, tradable, or subject to cancellation under different scenarios.

### **Benefit sharing**

Respondents called for clarity regarding how revenue-sharing arrangements are designed, documented, and reported. In particular, they requested a more precise definition of ‘co-design’ in the context of benefit-sharing. Overall, respondents sought more explicit procedural and reporting requirements.

## **Equitable Earth response**

### **Livelihoods and stakeholder engagement**

1. In response to this feedback, Equitable Earth has introduced additional flexibility within the livelihoods pillar by allowing developers to define additional baseline attributes based on project-specific contexts.
2. Equitable Earth has removed references to specific project phases such as ‘at feasibility’ or ‘at design’ across the documentation.
3. Equitable Earth has removed the requirement to establish a formal stakeholder committee. Instead, developers must identify representatives for each stakeholder group and develop a stakeholder engagement plan detailing how different groups will be engaged, including engagement formats, communication channels, feedback mechanisms, and frequency.
4. Equitable Earth has revised and formalised stakeholder terminology by introducing stakeholder types (core, direct, indirect, and other), which are now



used consistently to clarify the applicability of requirements such as co-design, social additionality, safeguards, benefit-sharing, and FPIC.

5. While Equitable Earth acknowledges the importance of addressing intra-community inequities, gender dynamics, and financial capacity building, these elements have not yet been explicitly incorporated into the Standard. Equitable Earth believes that such elements should be co-designed with IPs and LCs to ensure appropriateness and effectiveness.

### **Suspended and failed projects**

Equitable Earth has clarified how ECUs are managed in cases of suspension or project failure.

For suspended projects, the issuance of new ECUs is paused for the duration of the suspension. ECUs issued before the suspension effective date remain valid and tradable, unless Equitable Earth determines otherwise.

For failed projects, Equitable Earth may cancel issued ECUs only where the cause of failure materially compromises their environmental or social integrity. Any cancellation applies solely to units that remain active in the Equitable Earth Registry. ECUs that have already been retired will not be cancelled.

### **Benefit sharing**

Equitable Earth has strengthened benefit-sharing requirements to ensure transparent, participatory, and well-documented processes.

The Standard specifies minimum expectations for stakeholder engagement in the development of benefit-sharing plans, including information disclosure, solicitation and documentation of respondent input, a summary of how feedback was integrated, and retention of records of meetings and communications.

Financial and project budget requirements have been expanded to improve transparency around revenue flows and benefit sharing. Developers must disclose estimated or verified ECU revenues and other funding sources as percentages, as well as all expenditures and disbursements related to benefit sharing. All benefit-sharing arrangements must be reported to Equitable Earth and disclosed publicly through Annual and Monitoring Reports. Developers must identify any elements deemed sensitive, and Equitable Earth ensures such information is excluded from publicly available documentation where appropriate.

Finally, developers are required to update, or justify not updating, the benefit-sharing plan at adaptive management throughout the crediting period.



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