

MARINE CONSERVATION CREDITS

MCC-100 — Amendment 1

Revision Loop, Registration Workflow Stages and Prioritised Sequencing

Version 1.0 — Adopted 17 August 2026

Status: ADOPTED by the Governing Board on 17 August 2026 by the two-thirds majority required under clause 0021, decision D-2026-08-01 (MCC-BDR-2026-002). **In force from 17 August 2026.**

Preamble

This Amendment amends MCC-100 (Programme Standard, v2.0, March 2026) in respect of the Project registration workflow established by clauses 0049–0062.

MCC-100 v2.0 defines the registration workflow as seven sequential stages and states, at clause 0053, that a Project Developer shall have thirty calendar days to address deficiencies identified in the completeness check. It does not, however, specify (i) the state in which a Project sits while deficiencies are being addressed, (ii) which authority may return a Project for revision and from which stages, (iii) how a resubmission is distinguished from a first submission, or (iv) the stage at which the mandatory safeguards screening required by clauses 0046 and 0063 is performed.

The MCC platform implements a return-for-revision mechanism, an eight-stage workflow that includes a discrete safeguards screening stage, and a database-level transition guard that permits a Project to advance by exactly one lawful stage per decision. This Amendment brings the Programme Standard into alignment with that operating reality, in the direction indicated by the Programme Standard itself: the platform is the instrument, MCC-100 is the authority, and the authority must state the rule.

This Amendment further clarifies that the "fast-track" eligibility referred to in MCC-850 Article 14 confers priority in the review queue only, and confers no relief from any mandatory stage, consultation period or assessment scope.

Operative Provisions

Part A — Registration workflow stages

Clause 0050 is repealed and replaced by the following:

0050 The Project registration workflow shall comprise eight sequential stages: DRAFT (internal preparation), SUBMITTED (application received), COMPLETENESS_CHECK (administrative verification), SAFEGUARDS_SCREENING (environmental and social risk categorisation under Section 4), TECHNICAL_REVIEW (substantive assessment), STAKEHOLDER_CONSULTATION (public disclosure and feedback period), GOVERNANCE_REVIEW (decision-making), and REGISTERED (official listing).

The following clauses are inserted after clause 0050:

0050.1 In addition to the eight sequential stages, a Project may occupy one of the following non-sequential states: REJECTED (registration refused under clause 0057(c)) or WITHDRAWN (application withdrawn by the Project Developer under clause 0053.6). Both are terminal for the submission concerned.

0050.2 A Project shall advance by exactly one stage per decision of the responsible authority. No decision shall move a Project through two or more stages, and no stage shall be recorded as completed without a decision by the authority responsible for that stage under the stage table in this Section.

0050.3 The SAFEGUARDS_SCREENING stage shall follow a positive completeness check and shall precede technical review. At this stage the Programme Administrator shall confirm receipt and adequacy of the safeguards screening form, record the risk category assigned under clauses 0065–0068, and confirm that the assessment instruments required for that category (ESIA, ESMP, FPIC documentation) are either submitted or scheduled with dated commitments.

0050.4 The safeguards screening required by this clause is distinct from, and does not substitute for, the safeguards clearance gate required by clause 0079 before Credit Issuance.

0050.5 All stage transitions shall be enforced programmatically against a published transition table. A transition not present in that table shall be rejected by the registry system. Any administrative override of the transition guard shall be recorded as a high-severity audit event, attributed to a named user, and reported to the Compliance Function.

Part B — Return for revisions

The following clauses are inserted after clause 0053:

0053.1 The Programme Administrator or the Review Authority may return a Project for revisions where deficiencies, findings or unresolved questions prevent the Project from progressing. A return for revisions shall move the Project to the DRAFT stage.

0053.2 A return for revisions shall be available from the SUBMITTED, COMPLETENESS_CHECK, SAFEGUARDS_SCREENING and TECHNICAL_REVIEW stages only. Once the stakeholder consultation period has opened under clause 0054, the Project shall not be returned to DRAFT; the responsible authority shall instead apply conditions under clause 0057(b) or refuse registration under clause 0057(c).

0053.3 A return for revisions shall be accompanied by the open findings on which it is based, stated in writing, each identifying the deficiency, its severity, and the provision of the Methodology, this Standard or a related MCC document to which it relates. A return for revisions shall not be issued without at least one recorded finding or a written statement of reasons.

0053.4 The thirty calendar day cure period under clause 0053 shall run from the date on which the return for revisions is notified to the Project Developer. The Programme Administrator may extend the cure period once, by up to thirty calendar days, on written request stating cause.

0053.5 A Project returned to DRAFT may be resubmitted by the Project Developer. On

resubmission the Project shall re-enter the SUBMITTED stage, the registry shall record the submission as a resubmission and preserve the record of each prior submission and return, and the completeness check period under clause 0051 shall run afresh from the date of resubmission. Resubmission does not reopen any stage beyond the stage at which the Project stood when it was returned.

0053.6 A Project Developer may withdraw a Project at any stage before registration. Withdrawal shall be recorded as WITHDRAWN, with the date and, where given, the stated reason. A withdrawn Project may be submitted afresh as a new application.

0053.7 Where a Project is returned for revisions three or more times within a single registration cycle, the Programme Administrator shall document the pattern and report it to the Review Authority, which shall determine whether the application should proceed, be made subject to conditions, or be refused. This clause does not limit the number of permitted resubmissions.

0053.8 Every submission, return for revisions, withdrawal, rejection and stage advance shall be recorded in the audit trail with the identity of the deciding user, the timestamp, the prior and resulting stage, and the reasons or findings relied upon.

Part C — Refusal during review

The following clause is inserted after clause 0057:

0057.1 The Review Authority may refuse registration at any pre-registration stage where the grounds for refusal are established, and is not required to advance a Project through the remaining stages before doing so. A refusal shall be issued in writing with reasons and shall carry the appeal rights provided by Section 15 and MCC-700.

Part D — Prioritised sequencing

The following clauses are inserted after clause 0061:

0061.1 An automated completeness report produced under MCC-850 may flag a submission as a candidate for prioritised sequencing in the review queue. The flag is informative only. It shall be visible to programme staff, shall not be communicated to the Project Developer as a decision or an indication of outcome, and shall not of itself alter the status of any Project.

0061.2 Prioritised sequencing confers priority in the order in which submissions are taken up by reviewers, and nothing further. It shall not permit any stage under clause 0050 to be omitted, shall not shorten the minimum stakeholder consultation period under clause 0054, shall not reduce the scope of validation under clause 0151, and shall not reduce any assessment, safeguards or verification requirement of this Standard.

0061.3 The expression "fast-track" where used in MCC-850 Article 14 shall be construed as prioritised sequencing within the meaning of clause 0061.2.

Consequential Amendments

1. Stage table (Section 3). The stage table following clause 0062 is amended by inserting, between COMPLETENESS_CHECK and TECHNICAL_REVIEW, the row:
"SAFEGUARDS_SCREENING | Programme Administrator | 10 business days | Screening form complete; risk category assigned; category-appropriate assessment instruments submitted or scheduled".

2. Clause 0061. The words "the complete seven-stage workflow" are replaced by "the complete eight-stage workflow", and the clause is read subject to clauses 0050.2 and 0053.1–0053.5, which do not constitute the skipping of a stage.

3. Programme Standard Section Map. The entry for Section 3 is amended to read "Registration workflow with 8 sequential stages, revision loop and prioritised sequencing".

4. Clause 0046. The words "at registration" are read as referring to the SAFEGUARDS_SCREENING stage established by clause 0050.3.

Transitional Provision

Projects standing at any pre-registration stage on the entry-into-force date shall be migrated to the eight-stage workflow at their current stage. A Project standing at COMPLETENESS_CHECK on that date shall proceed to SAFEGUARDS_SCREENING. No Project shall be returned to DRAFT solely by reason of this Amendment, and no cure period running on that date shall be shortened by it.

Entry into Force

This Amendment was adopted by the Governing Board on 17 August 2026 by the two-thirds majority required under clause 0021 (decision D-2026-08-01) and **entered into force on 17 August 2026**, immediately upon adoption. The Programme Administrator shall publish the Amendment and its entry-into-force date through the MCC Transparency Layer.

Editorial note: This Amendment shall be incorporated into MCC-100 v2.1. The original clause 0050 text shall be preserved in the version-control appendix of MCC-100 v2.1 in accordance with clause 0249. This Amendment is to be read with MCC-850 Amendment 2 (Automated Completeness Report, Applicant Disclosure and Degraded Mode), which governs the automated report referred to in clause 0061.1.