MARINE CONSERVATION CREDITS

MCC-100 — Programme Standard

Version 2.2 — Consolidated text
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Status: **APPROVED**

Document control

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Status of this text	Consolidated text prepared for operational and due-diligence use. It reproduces MCC-100 v2.0 as amended. Where this consolidated text and the adopting instruments differ, the adopting instruments prevail.

Revised to integrate Environmental and Social Safeguards, Sustainable Development Contribution, Host Country Authorisation, Corresponding Adjustments, Buffer Pool, and Operational Roadmap. Consolidated at v2.2 to integrate the registration revision loop, the mandatory safeguards screening stage, and prioritised sequencing.

HOW TO READ THIS TEXT

Clauses carry the four-digit numbering of MCC-100 v2.0. Clauses inserted by amendment carry a decimal suffix (for example 0050.1) and sit immediately after the clause they supplement; the numbering of the original clauses is unchanged. Indented notes in smaller type are editorial and interpretive: they record how an amendment directs an existing clause to be read, and are not themselves operative provisions. Appendix A lists every change made to the v2.0 text and reproduces each superseded provision in full.

SCOPE AND APPLICATION

0001 MCC-100 Programme Standard v2.0 establishes the core programme rules governing the Marine Conservation Credits programme.

0002 This Standard shall apply to all Projects, methodologies, participants, and credit instruments within the MCC programme framework.

0003 The scope of the MCC programme shall be limited to marine and coastal ecosystems as defined in MCC-001, Charter and Constitution.

0004 All Projects registered under MCC-100 shall demonstrate a direct and material connection to a marine or coastal ecosystem.

0005 The MCC programme recognises and implements ten approved methodologies: M001 through M010, each applicable to specific marine conservation activities.

0006 Projects shall be classified within one of five methodology families: MCC-F01 (Blue Carbon), MCC-F02 (Restoration), MCC-F03 (Fisheries), MCC-F04 (Pollution Prevention), and MCC-F05 (MPA Management).

0007 The MCC programme shall issue three types of credits: MCC-CC (Carbon Credits) representing one tonne of CO_2e reduction or removal, MCC-HYB (Hybrid Credits) combining carbon and conservation outcomes, and MCC-MCU (Marine Conservation Units) representing non-carbon ecosystem services.

0008 All Projects shall conform to applicable MCC Methodologies. No Project shall be registered without an applicable approved Methodology or approved methodology development proposal.

0009 The MCC programme shall operate as an integrated standard-setting body, registry operator, and programme administrator.

0010 All participants, including Project Developers, Validation and Verification Bodies (VVBs), Credit Buyers, and governance bodies, shall comply with MCC-100 and related MCC programme documents.

0011 MCC-100 shall be read consistently with MCC-001 (Charter), MCC-700 (Governance), and other referenced MCC documents. In case of conflict, MCC-001 prevails over all documents, and MCC-700 prevails over MCC-100 on matters of governance authority.

0012 Terms used with initial capitalisation in MCC-100 shall have meanings assigned in the MCC Definitions Register.

0013 The authority verb hierarchy defined in MCC-001, Section 13.4 shall apply throughout this document: 'shall' denotes mandatory requirement; 'may' denotes permission; 'should' denotes recommendation; 'will' denotes statement of fact.

0014 MCC-100 applies to all persons and entities participating in the MCC programme, without exception.

0015 The MCC programme shall maintain independence from any single government, market, or regulatory jurisdiction.

PROGRAMME GOVERNANCE

0016 The governance structure of MCC shall ensure separation of functions between standard-setting, operational administration, and oversight.

0017 The Governance Board shall be the supreme governing authority, comprising representatives from Project Developers, environmental NGOs, government observers, and independent experts.

0018 The Governance Board shall convene quarterly and shall maintain a quorum of two-thirds of appointed members.

0019 The Governance Board shall make final decisions on programme-wide policy, Methodology approval, material amendments to MCC-100, and appeals of governance decisions.

0020 Board decisions on Methodology approval shall require simple majority vote of present members.

0021 Board decisions on material amendments to MCC-100 shall require two-thirds majority vote.

0022 The Methodology Standards Panel shall be responsible for technical evaluation and approval of Methodologies and methodology amendments.

0023 The Methodology Standards Panel shall comprise at least five members with expertise in marine science, conservation, carbon accounting, and social safeguards.

0024 The Methodology Standards Panel shall evaluate Methodologies against the criteria defined in MCC-200 (Methodology Rules) and provide recommendations to the Governance Board.

0025 The Review Authority shall be responsible for making Project-level governance decisions including project registration, Credit Issuance approval, project suspension, and project revocation.

0026 The VVB Oversight Committee shall be responsible for VVB accreditation, performance monitoring, and disciplinary decisions.

0027 The Registry Authority shall be responsible for all registry actions including credit issuance, retirement recording, and data management.

0028 The Compliance Function shall monitor programme integrity, investigate non-compliance, recommend enforcement action, and provide independent assurance.

0029 Nine defined roles shall operate within the MCC governance structure: Programme Administrator, Executive Director, Standard-Setting Officer, Methodology Specialist, Registry Manager, Compliance Officer, VVB Accreditation Manager, Appeal Officer, and System Administrator.

0030 The Programme Administrator shall receive and process all Project submissions, conduct administrative completeness checks, and coordinate Review Authority assessments.

0031 The Executive Director shall oversee all MCC operations and report to the Governance Board.

0032 The Standard-Setting Officer shall manage Methodology development processes and coordinate with the Methodology Standards Panel.

0033 The Methodology Specialist shall provide technical expertise on Methodology evaluation and carbon accounting standards.

0034 The Registry Manager shall oversee registry operations, credit issuance, retirement processing, and data integrity.

0035 The Compliance Officer shall investigate potential non-compliance, recommend enforcement actions, and maintain compliance records.

0036 The VVB Accreditation Manager shall evaluate VVB applications, monitor VVB performance, and recommend accreditation decisions.

0037 The Appeal Officer shall manage the appeal process and ensure procedural fairness in governance decisions.

0038 The System Administrator shall maintain the MCC platform, database, and technical infrastructure.

0039 All governance bodies and staff shall adhere to conflict of interest and independence requirements defined in MCC-700 and MCC-800.

0040 Governance body minutes and decisions shall be recorded and made publicly available within thirty calendar days of decision.

Role	**Function**	**Reporting Line**
Programme Administrator	Project submissions, completeness checks, coordination	Executive Director
Executive Director	Overall MCC operations, Governance Board liaison	Governance Board
Standard-Setting Officer	Methodology development, standards processes	Executive Director
Methodology Specialist	Technical Methodology evaluation, carbon accounting	Standard-Setting Officer
Registry Manager	Credit issuance, retirement, data management	Executive Director
Compliance Officer	Non-compliance investigation, enforcement	Executive Director
VVB Accreditation Manager	VVB evaluation, accreditation, performance monitoring	Executive Director
Appeal Officer	Appeal process administration, procedural fairness	Governance Board
System Administrator	Platform, database, infrastructure, cybersecurity	Executive Director

PROJECT ELIGIBILITY AND REGISTRATION

0041 All Projects shall meet mandatory eligibility criteria before registration.

0042 Project eligibility criteria shall include: (a) direct and material connection to a marine or coastal ecosystem; (b) application of an approved MCC Methodology; (c) demonstration of measurable, quantifiable outcomes; (d) compliance with host country law; and (e) demonstration of additionality.

0043 Additionality shall be demonstrated by showing that the Project would not occur under the baseline scenario absent crediting incentives.

0044 Projects shall use conservative baseline methodologies appropriate to the marine ecosystem and activity type.

0045 Projects shall demonstrate that outcomes are measured and monitored according to the applicable Methodology.

0046 All Projects shall undergo environmental and social safeguards screening at registration, with risk categorisation and assessment requirements proportionate to risk level.

> *Amendment 1 (D-2026-08-01), Consequential Amendment 4: the words "at registration" in this clause are read as referring to the SAFEGUARDS_SCREENING stage established by clause 0050.3.*

0047 All Projects shall demonstrate contribution to sustainable development against the UN Sustainable Development Goals framework.

0048 Host country authorisation shall be obtained and verified where required by national law, with verification occurring before credit issuance.

0049 Project registration shall follow a defined workflow with mandatory gates and transparency requirements.

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).

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.

0051 The Programme Administrator shall conduct a completeness check within ten business days of Project submission.

0052 The completeness check shall verify: (a) PDD addresses all required sections per Methodology; (b) supporting documentation is complete; (c) applicable Methodology is approved; (d) listing fee has been paid; (e) Project Developer is registered; and (f) safeguards screening form is submitted.

0053 If completeness check identifies deficiencies, the Project Developer shall have thirty calendar days to address deficiencies.

> *Read with clauses 0053.1–0053.8 (return for revisions), inserted by Amendment 1 (D-2026-08-01).*

`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.

0054 Following positive completeness check, the Programme Administrator shall list the Project on the public platform and invite stakeholder consultation for a minimum of thirty calendar days.

0055 The Review Authority shall conduct technical review of the Project Design Document, Validation Report, safeguards assessment, and Host Country Authorisation (if applicable) within thirty business days of completeness check clearance.

0056 Technical review shall address: (a) Methodology application correctness; (b) baseline conservatism; (c) additionality demonstration; (d) monitoring plan feasibility; (e) permanence risk assessment; (f) safeguards adequacy; and (g) sustainable development contribution.

0057 The Review Authority shall issue a written registration decision: (a) APPROVED (unconditional registration); (b) APPROVED WITH CONDITIONS (registration subject to specified conditions being met before credit issuance); or (c) REJECTED (with written reasons).

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.

0058 Upon registration approval, the Registry Authority shall issue a unique Project identifier and record the Project in the MCC Registry with commencement date and Crediting Period start date.

0059 Registration validity shall be for the Project's entire Crediting Period plus five years, allowing for late-submitting verification reports.

0060 Projects may request registration renewal for additional periods beyond the initial validity, subject to Review Authority approval and demonstration of continued eligibility.

0061 A Project may transition from DRAFT to REGISTERED stage only by following the complete eight-stage workflow without skipping any mandatory stage. This clause is read subject to clauses 0050.2 and 0053.1–0053.5; a return for revisions and the resubmission that follows it do not constitute the skipping of a stage.

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.

0062 The Project registration process shall be fully transparent, with all submissions and decisions made publicly available except for commercially sensitive information.

Stage	**Actor**	**Timeframe**	**Gate Criteria**
DRAFT	Project Developer	N/A	N/A
SUBMITTED	Programme Administrator	Immediate	Receives PDD submission
COMPLETENESS_CHECK			

Programme Administrator
10 business days
PDD complete, Methodology approved, fees paid
SAFEGUARDS_SCREENING
Programme Administrator
10 business days
Screening form complete; risk category assigned; category-appropriate assessment instruments submitted or scheduled
TECHNICAL_REVIEW
Review Authority
30 business days
Completes substantive assessment
STAKEHOLDER_CONSULTATION
Public
Minimum 30 days
Minimum consultation period
GOVERNANCE_REVIEW
Review Authority
Concurrent with consultation
Issues written decision
REGISTERED
Registry Authority
Immediate upon approval
Project listed in Registry

ENVIRONMENTAL AND SOCIAL SAFEGUARDS

0063 All Projects shall undergo mandatory environmental and social safeguards screening at registration.

> *Read with clause 0050.3, which establishes SAFEGUARDS_SCREENING as a discrete stage of the registration workflow, and with clause 0050.4, which distinguishes it from the safeguards clearance gate under clause 0079.*

0064 Safeguards screening shall inform risk categorisation and determine the level of environmental and social assessment required.

0065 Projects shall be categorised into one of three risk categories: Category A (high risk), Category B (medium risk), or Category C (low risk).

0066 Category A Projects shall include those with potential for significant adverse environmental or social impacts, including impacts on Indigenous Peoples, vulnerable populations, or critical marine ecosystems.

0067 Category B Projects shall include those with moderate potential for adverse impacts that are fewer in scope, reversible, or readily mitigated.

0068 Category C Projects shall include those with minimal or no potential for adverse environmental or social impacts.

0069 Category A Projects shall require a full Environmental and Social Impact Assessment (ESIA) conducted by qualified independent experts.

0070 Category B Projects shall require a simplified environmental and social assessment appropriate to the risk level.

0071 Category C Projects shall require submission of a self-declaration of safeguards compliance.

0072 Environmental and Social Management Plans (ESMP) shall be mandatory for Category A and Category B Projects, specifying impact mitigation measures, monitoring procedures, and management responsibilities.

0073 All Projects, regardless of risk category, shall establish and maintain a functional grievance mechanism allowing affected stakeholders to lodge complaints and seek redress.

0074 Grievance mechanisms shall be free, confidential, timely, and culturally appropriate, with documented procedures for intake, investigation, and resolution.

0075 Where Indigenous Peoples are present in or near the Project area and potentially affected by Project activities, Free, Prior, and Informed Consent (FPIC) shall be obtained before Project registration.

0076 FPIC shall be documented in writing and shall be based on good-faith consultation conducted in the Indigenous Peoples' language and following their decision-making processes.

0077 Annual safeguards monitoring shall be conducted throughout the Project's Crediting Period for all Category A and Category B Projects.

0078 Safeguards monitoring reports shall be submitted with each Verification Report and shall assess: (a) implementation of the ESMP; (b) grievance mechanism functionality and complaint resolution; (c) FPIC status and community relations; and (d) any adverse impacts or non-compliance.

0079 A safeguards clearance gate shall be mandatory before any Credit Issuance can occur, confirming that safeguards requirements have been met or conditions resolved.

0080 The Compliance Function shall oversee safeguards implementation and may recommend remedial action or suspension of Projects with safeguards violations.

0081 MCC-100 shall be read in conjunction with MCC-ESS-v1.0 (Environmental and Social Safeguards Standard), which provides detailed methodologies, assessment tools, and guidance.

0082 Projects shall comply with all applicable international safeguards standards including the World Bank Safeguard Policies, IFC Performance Standards, and relevant international conventions.

0083 Safeguards non-compliance may result in credit suspension, cancellation, or Project revocation as determined by the Compliance Function and Review Authority.

Category	Risk Level	ESIA Required	ESMP Required	FPIC If Indigenous Present
A	High	Yes (full)	Yes	Yes
B	Medium	Simplified	Yes	Yes
C	Low	No	No	Consultation only

SUSTAINABLE DEVELOPMENT CONTRIBUTION

0084 All Projects shall demonstrate a positive contribution to sustainable development aligned with the United Nations Sustainable Development Goals (SDGs).

0085 Projects shall conduct a Sustainable Development (SD) assessment against the UN SDG framework as part of Project Design Document preparation.

0086 The SD assessment shall identify and quantify contributions to at least three distinct SDG indicators per Project.

0087 SD contribution shall be tracked and reported in each Monitoring Report and verified in Verification Reports.

0088 The SD assessment shall use baseline and project scenarios to demonstrate additionality of SD benefits.

0089 SD indicators shall be selected from the official UN SDG indicator list, adapted for marine conservation contexts where necessary.

0090 Common SD indicators for marine Projects may include: marine ecosystem health indicators, employment creation, income generation, food security improvements, and ecosystem resilience.

0091 A Sustainable Development Contribution Score shall be calculated during Verification on a scale of 1-5, reflecting the magnitude and significance of demonstrated SD benefits.

0092 Score assignment shall be conducted by qualified SD assessors approved by MCC and shall be documented in Verification Reports.

0093 Projects shall be eligible for 'MCC SD Gold' designation where they achieve a score of 4 or higher on five or more SDG indicators.

0094 MCC SD Gold Projects shall be designated in the public Registry and may be eligible for premium market pricing.

0095 SD performance shall be reported annually in Monitoring Reports and triennially in comprehensive SD reports to the Governance Board.

0096 The Governance Board shall publish aggregated SD contribution data showing Programme-wide impact on SDG progress.

0097 Projects claiming SD benefits shall substantiate claims with baseline data, monitoring data, and third-party verification.

0098 No Project shall make unsubstantiated claims about SDG contributions or assert causality beyond reasonable verification.

0099 MCC-100 shall be read in conjunction with MCC-SDCF-v1.0 (Sustainable Development Contribution Framework), which provides assessment methodologies and indicator guidance.

0100 Projects shall update their SD assessment annually, accounting for changes in baseline conditions and Project performance.

0101 Verified SD contributions shall be publicly reported and shall inform Programme-level reporting on MCC's contribution to global sustainability goals.

HOST COUNTRY AUTHORISATION

0102 All Projects shall obtain Host Country Authorisation where required by applicable national law.

0103 Host Country Authorisation shall confirm that the Project is consistent with national climate and environmental policy and that the host country endorses or permits Project implementation.

0104 A Letter of Authorisation (LoA) or equivalent governmental document shall be obtained and submitted before Credit Issuance.

0105 The LoA shall be issued by the designated national authority responsible for international environmental agreements and shall be signed by an authorised government official.

0106 Host countries shall be categorised into four categories based on their climate framework status: Category A (Article 6 framework operating), Category B (framework under development), Category C (no framework), or Category D (non-Party to UNFCCC).

0107 Category A countries shall have national Article 6 rules in place; Projects shall obtain LoA confirming no corresponding adjustments will be claimed.

0108 Category B countries shall have developing climate frameworks; Projects shall obtain LoA confirming governmental endorsement and commitment to corresponding adjustment procedures when framework is finalised.

0109 Category C countries shall have no formal climate framework; Projects shall obtain LoA confirming governmental authorisation and commitment to facilitate corresponding adjustment procedures should framework be adopted.

0110 Category D countries (non-Parties) shall not prevent Project implementation but Credits shall be restricted to voluntary market use, with corresponding adjustment mechanism not applicable.

0111 LoA documents shall include: (a) Project title and unique identifier; (b) issuance date and government issuing authority; (c) affirmation of consistency with national policy; (d) corresponding adjustment status commitment; (e) signature of authorised official; and (f) validity period.

0112 LoA validity shall extend for the entire Project Crediting Period plus five years.

0113 Projects shall submit LoA documentation to the Programme Administrator no later than the Verification Report submission.

0114 LoA verification shall be conducted by the Registry Manager as a mandatory prerequisite gate for Credit Issuance.

0115 If LoA is not obtained before Credit Issuance approval, Credit Issuance shall be suspended pending LoA receipt and verification.

0116 The Registry shall record LoA status and corresponding adjustment commitment status for every issued credit.

0117 Changes in host country climate framework status shall trigger LoA review and potential update requirements.

0118 MCC-100 shall be read in conjunction with MCC-HCA-v1.0 (Host Country Authorisation Standard), which provides templates, procedures, and category-specific guidance.

0119 Projects shall maintain LoA documentation for the duration of the Crediting Period and for seven years thereafter.

Category	Description	LoA Requirement	Corresponding Adjustment Status
A	Article 6 framework operating	Standard LoA	No CA claimed by host country
B	Framework developing	LoA with commitment	CA framework to be implemented
C	No framework		

LoA with commitment
CA mechanism subject to future framework
D
Non-Party to UNFCCC
Endorsement only
Not applicable; voluntary market only

CORRESPONDING ADJUSTMENTS AND DOUBLE COUNTING

0120 MCC shall implement comprehensive measures to prevent all forms of double counting of carbon and ecosystem outcomes.

0121 Five distinct forms of double counting shall be prohibited: (a) double issuance (issuing credits for the same outcome through multiple programmes); (b) double use (retiring the same credit multiple times); (c) double claiming (asserting the same climate benefit by multiple parties); (d) double registration (registering the same Project activity in multiple registries); and (e) double monetisation (obtaining payment for the same outcome from multiple sources).

0122 Corresponding Adjustment (CA) status shall be tracked for every MCC credit issued and shall be recorded at the credit level in the MCC Registry.

0123 Credits with confirmed corresponding adjustment status shall be eligible for use in compliance carbon markets and international climate policy frameworks.

0124 Credits without corresponding adjustment shall remain valid for retirement and voluntary market use but shall not be eligible for claims in compliance markets subject to corresponding adjustment requirements.

0125 The Registry shall maintain a cross-programme duplicate registration check procedure to prevent registration of the same Project activity in competing programmes.

0126 Project Developers shall declare and certify that the Project is registered with MCC exclusively and is not being registered or credited through any other international carbon or credit programme.

0127 Serial number format shall be: MCC[-DEMO]-[Type]-[Family F01–F05]-[ISO3 Country + Project Number]-[Vintage]-[8-digit Sequence]-[Luhn Check Digit] (canonical format per MCC-800 Article 27; adopted by FD-2026-08-24, item D13).

0128 Serial number uniqueness shall be enforced programmatically, with each issued credit receiving a unique, non-replicable serial number.

0129 Luhn check digit shall be calculated according to the algorithm specified in MCC-800 (Registry Operations Standard) and shall prevent accidental transcription errors.

0130 The Registry shall implement automated serial number validation to reject duplicate serial numbers or invalid check digits.

0131 Cross-programme duplicate registration checks shall be conducted using international registry interoperability protocols and coordinated databases.

0132 The Compliance Function shall maintain a central database of Projects registered across competing programmes to enable duplicate detection.

0133 Projects with suspected double registration shall be investigated, and findings shall be reported to the Review Authority and Governance Board.

0134 Confirmed double registration shall result in Project suspension or revocation and credit cancellation.

0135 Corresponding adjustment records shall be reviewed and updated annually to reflect host country climate policy changes.

0136 Credits eligible for corresponding adjustment shall display a 'CA-Confirmed' status flag in the public Registry.

0137 MCC-100 shall be read in conjunction with MCC-CADCP-v1.0 (Corresponding Adjustments and Double Counting Prevention Standard), which provides technical specifications and verification procedures.

0138 All Project Developers and VVBs shall receive training on double counting prevention mechanisms before conducting assessments.

0139 Registry users shall be required to acknowledge understanding of corresponding adjustment requirements before making public claims based on retired credits.

Double Counting Type	Prevention Mechanism	Detection Method	Enforcement
Double Issuance	Single registry control	Serial number uniqueness check	Automatic rejection
Double Use	Permanent retirement record	Blockchain or cryptographic verification	Retirement record audit
Double Claiming	Claims discipline (MCC-600)	Third-party audit of claims	Claims code enforcement
Double Registration	Cross-programme database check	Quarterly registry scan	Project suspension/revocation
Double Monetisation	Payment tracking (financing policy)	Disclosure requirement	Participant suspension

VALIDATION AND VERIFICATION

0140 All Projects shall be subject to independent third-party Validation and Verification by accredited Validation and Verification Bodies (VVBs).

0141 Validation shall assess the Project Design Document against the applicable Methodology and MCC programme rules before Project registration.

0142 Verification shall assess Monitoring Reports and monitored outcomes to a reasonable assurance standard before Credit Issuance.

0143 VVBs shall be accredited by the MCC VVB Oversight Committee and shall maintain ISO 14065 accreditation at all times while conducting MCC assessments.

0144 VVB accreditation shall require: (a) ISO 14065 accreditation; (b) demonstrated competence in marine conservation and carbon accounting; (c) no material conflicts of interest; (d) submission of references and performance records; and (e) payment of accreditation fees.

0145 VVB accreditation shall be valid for five years and shall be subject to annual performance review.

0146 VVBs shall comply with all conflict of interest and independence requirements specified in MCC-400 and the VVB Accreditation and Engagement Terms.

0147 A VVB shall not provide consulting, advisory, or project development services to any Project Developer whose Projects it validates or verifies.

0148 A VVB that has provided services to an Applicant shall be ineligible to conduct assessments for that Applicant's Projects for a minimum period of three years.

0149 VVB independence shall include: (a) no financial interest in Project outcomes; (b) no pre-determined assessment conclusions; (c) no commercial relationships with Project Developers; and (d) no pressure from any party to reach predetermined assessments.

0150 VVB rotation shall be required every three verification cycles to ensure continued independence and assessment quality.

0151 Validation scope shall comprehensively assess: (a) Project description, boundaries, and baseline determination; (b) Methodology application and appropriateness; (c) Baseline conservatism; (d) Additionality demonstration; (e) Monitoring plan feasibility and data quality; (f) Environmental and social safeguards adequacy; (g) Sustainable development contribution assessment; (h) Permanence risk assessment; and (i) Stakeholder consultation adequacy.

0152 Verification scope shall comprehensively assess: (a) Monitoring data completeness, accuracy, and source verification; (b) Quantification calculations and conservative application; (c) Leakage deductions; (d) Permanence status and reversal assessment; (e) Environmental and social safeguards implementation; (f) Sustainable development indicator tracking and scoring; (g) Corresponding adjustment status; and (h) Buffer pool contribution calculation.

0153 VVB assessments shall be documented in Validation Reports and Verification Reports using MCC templates.

0154 Validation and Verification Reports shall include: (a) scope statement; (b) methodology and procedures applied; (c) findings by each assessment section; (d) conclusion (positive, positive-with-conditions, or negative); (e) VVB signature and accreditation number; and (f) statement of independence.

0155 Site inspections shall be conducted by VVBs as required by the applicable Methodology or as determined by VVB professional judgment.

0156 VVBs shall have access to all Project documentation, monitoring data, and Project sites to conduct thorough assessments.

0157 VVB assessment records shall be maintained for a minimum of ten years following Project completion.

0158 The VVB Oversight Committee shall monitor VVB performance, quality, and independence on an ongoing basis through file reviews, complaints investigation, and periodic audits.

0159 VVBs with performance deficiencies shall be notified and afforded opportunity to remediate before accreditation suspension or revocation.

0160 Material VVB non-compliance may result in accreditation suspension (temporary) or revocation (permanent).

CREDIT ISSUANCE

0161 Credit Issuance shall occur only after all mandatory prerequisite gates have been satisfied.

0162 The Credit Issuance workflow shall include seven mandatory sequential prerequisites: (1) completed Verification Report with positive Verification Statement; (2) safeguards clearance confirmation; (3) host country authorisation verification (where applicable); (4) corresponding adjustment status recorded; (5) buffer pool contribution calculated; (6) no non-compliance or disputes in progress; and (7) Review Authority governance approval.

0163 All prerequisites shall be satisfied sequentially without exception or deviation.

0164 The Registry Manager shall conduct final verification that all prerequisites have been met before issuing credits.

0165 Credit serial numbers shall follow the format: MCC[-DEMO]-

[Type]-[Family F01–F05]-[ISO3 Country + Project Number]-[Vintage]-[8-digit Sequence]-[Luhn Check Digit] (canonical format per MCC-800 Article 27; adopted by FD-2026-08-24, item D13).

0166 Serial number components shall be assigned as follows: Type shall indicate MCC-CC (Carbon Credit), MCC-HYB (Hybrid Credit), or MCC-MCU (Marine Conservation Unit); Family shall be the methodology family code F01–F05 to which the applied Methodology (M001–M010) belongs; the Country/Project component shall be the host-country ISO 3166-1 alpha-3 code followed by the four-digit project number; Vintage shall be the four-digit vintage year; Sequence shall be the eight-digit sequential number within the project and vintage; and Luhn Check Digit shall be the calculated check digit.

0167 Each MCC credit shall represent: MCC-CC representing one metric tonne of CO2 equivalent reduction or removal; MCC-HYB representing one tonne of CO2 equivalent plus specified ecosystem co-benefits; and MCC-MCU representing a unit of marine conservation outcome as defined in the applicable Methodology (non-carbon).

0168 Credit types shall be determined by the Project Methodology and shall be specified in the Project Design Document.

0169 Buffer pool contribution shall be calculated as a percentage deduction from verified emission reductions or removals, ranging from 10% to 40% based on a five-factor risk assessment.

0170 Buffer pool risk factors shall assess: (a) permanence risk (reversibility of Project outcomes); (b) vintage risk (time elapsed since Project start); (c) baseline risk (uncertainty in baseline determination); (d) leakage risk (likelihood of outcome shifting); and (e) methodological risk (confidence in quantification).

0171 Buffer pool contributions shall be calculated using a published risk assessment matrix specified in MCC-800 (Registry Operations Standard).

0172 Calculated buffer contributions shall be automatically deducted from verified quantities before issuing credits to Account Holders.

0173 Example: A Project verifies 100 tonnes of CO2e removal with a 20% buffer deduction. The Review Authority shall issue 80 credits (MCC-CC) and 20 credits shall be deposited in the buffer pool.

0174 Buffer pool credits shall be held in segregated Registry accounts managed by the Programme Administrator.

0175 Issuance decisions shall be made by the Review Authority within thirty business days of receiving a complete Verification Report submission.

0176 The Review Authority may: (a) approve Issuance (all prerequisites satisfied); (b) approve Issuance with Conditions (specified conditions must be resolved within 90 days); or (c) reject Issuance (with written reasons).

0177 Approved credits shall be immediately recorded in the Registry and transferred to the Project Developer's Account Holder registry accounts.

0178 Credit Issuance shall be publicly disclosed in the Registry within five business days of Record date.

0179 The Registry shall display for each issued credit: serial number, Type, quantity, Vintage year, issuing Methodology, host country, corresponding adjustment status, and issuance date.

0180 Credits shall be divisible and transferable as permitted by MCC-800 (Registry Operations Standard).

0181 Issued credits shall remain valid for retirement indefinitely, subject to permanent retirement requirements in Section 12.

Prerequisite	**Responsible Party**	**Gate Type**	**Reference**
Positive Verification Statement	VVB/Review Authority	Quality Gate	Section 8
Safeguards Clearance	Compliance/Review Authority	Safeguards Gate	Section 4
Host Country Authorisation Verified	Registry Manager	Authorisation Gate	Section 6
Corresponding Adjustment Status Recorded	Registry Manager		

Data Gate
Section 7
Buffer Pool Contribution Calculated
Registry Manager
Calculation Gate
Section 10
No Active Disputes
Compliance Function
Compliance Gate
Section 15
Governance Approval
Review Authority
Authority Gate
Section 2

BUFFER POOL AND PERMANENCE

0182 MCC shall maintain a programme-level Buffer Pool as a risk reserve mechanism to ensure the environmental integrity of issued Credits.

0183 The Buffer Pool shall hold credits deducted from verified emissions reductions and removals, allocated in proportion to permanence risk and other identified risk factors.

0183.1 Family-differentiated permanence horizons shall apply per MCC-200 clause 0031.1: MCC-F01 (Blue Carbon — MCC-CC removals) shall apply a 100-year permanence horizon with 30-year post-crediting monitoring; MCC-F02 (Restoration — MCC-HYB) shall apply a 30-year permanence horizon with 20-year post-crediting monitoring; MCC-F05 (MPA Management — MCC-HYB) shall apply a 30-year permanence horizon with 10-year post-crediting monitoring.

0183.2 MCC-F03 (Fisheries — MCC-MCU avoided emissions) and MCC-F04 (Pollution Prevention — MCC-MCU avoided emissions) shall not apply a non-permanence buffer, as avoided fuel/methane and avoided decomposition emissions are flow measures and not stored carbon. Buffer contributions for F03/F04, where applied, shall address baseline and leakage uncertainty only.

0184 The Buffer Pool shall operate as a segregated account within the MCC Registry, managed by the Registry Manager and supervised by the Governance Board.

0185 Buffer contributions shall be calculated at Credit Issuance for all Projects according to the five-factor risk assessment methodology specified in the Buffer Pool Management Policy (MCC-BPM).

0186 Buffer contributions shall range from 10% (low-risk Projects) to 40% (high-risk Projects) of verified emission reductions or removals.

0187 Low-risk Projects shall typically include coastal protection activities with high permanence certainty and shall require 10-15% buffer contributions.

0188 Medium-risk Projects shall include restoration activities with moderate permanence uncertainty and shall require 20-25% buffer contributions.

0189 High-risk Projects shall include removal activities or activities in high-reversal-risk contexts and shall require 30-40% buffer contributions.

0190 Buffer Pool credits shall be cancelled on confirmed reversal of Project outcomes, whether through natural disaster, human activity, or other causes.

0191 Reversal shall be defined as loss of more than 10% of cumulative Project outcomes in any 12-month period or more than 20% over the Project's Crediting Period.

0192 Annual permanence reassessment shall be conducted for all Projects during Monitoring and Verification cycles.

0193 The Governance Board shall assess overall Buffer Pool adequacy annually, reviewing reserve adequacy against historical reversal rates and estimated reversal probabilities.

0194 If Buffer Pool adequacy falls below 10% of issued credits, the Governance Board may increase buffer contribution percentages for new Projects.

0195 Buffer release mechanism shall allow for gradual release of buffer credits to Project Developers where Projects demonstrate long-term permanence.

0196 Projects that have completed their Crediting Period without reversal events shall be eligible for buffer release of up to 50% of their buffer contributions, subject to Governance Board approval.

0197 Buffer release shall occur only after the Project has been permanently retired or the Crediting Period has concluded.

0198 Cancelled buffer credits shall be recorded in the Registry as permanent cancellations and shall not be reissued or recovered.

0199 All Buffer Pool activity shall be transparently recorded and publicly reported, including contributions, releases, and cancellations.

0200 MCC-100 shall be read in conjunction with MCC-BPM-v1.0 (Buffer Pool Management Standard), which provides detailed permanence assessment methodologies and buffer calculation procedures.

0201 The Governance Board shall publish annual reports on Buffer Pool status, including reserve level, contributions, releases, and cancellations.

Risk Level	Typical Activities	Buffer Contribution Range	Permanence Assessment Frequency
Low (10-15%)	Coastal protection, habitat designation	10-15%	Annual
Medium (20-25%)	Restoration (managed)	20-25%	Annual
High (30-40%)	Removal, high-risk contexts	30-40%	Biannual

REGISTRY AND TRANSPARENCY

0202 MCC shall maintain a public registry for all issued credits, retirement records, and Project information.

0203 The MCC Registry shall be the authoritative record of all MCC credits and shall be the exclusive mechanism for recording credit ownership, transfers, and retirements.

0204 The Registry shall be searchable by the public using multiple criteria: serial number, Project name, Project Developer, Methodology, host country, vintage year, credit status, and corresponding adjustment status.

0205 Registry data shall be updated in real-time and shall be publicly accessible without requiring login or fee payment.

0206 The Registry shall display for each issued credit: (a) serial number; (b) credit Type (MCC-CC, MCC-HYB, MCC-MCU); (c) quantity; (d) vintage year; (e) issuance date; (f) Project name and location; (g) applicable Methodology; (h) host country; (i) current status (issued, transferred, retired); (j) corresponding adjustment status; and (k) if retired, retirement date and entity retiring the credit.

0207 The Registry shall display for each Project: (a) unique Project identifier; (b) Project title; (c) location and host country; (d) Project Developer; (e) applicable Methodology; (f) registration date; (g) Crediting Period dates; (h) environmental and social risk category; (i) safeguards status; (j) sustainable development score; (k) cumulative credits issued; (l) cumulative credits retired; and (m) Project status (registered, verified, paused, suspended, revoked).

0208 All Credits, irrespective of status, shall remain permanently searchable in the Registry.

0209 Retirement records shall be permanently recorded in the Registry and shall be publicly visible.

0210 A retirement certificate shall be generated automatically for each retired credit, recording: retirement date, retiring entity, purpose of retirement (if disclosed), and certification number.

0211 Corresponding adjustment status shall be displayed for each credit, indicating: (a) CA-Confirmed (corresponding adjustment implementation committed); (b) CA-Under Development (host country framework developing); (c) CA-Not Applicable (non-Party context); or (d) CA-Pending (status under review).

0212 Public data feeds shall be provided in machine-readable formats (CSV, JSON, XML) to enable third-party analysis, academic research, and independent verification.

0213 A Registry API shall be available for authorised third parties to perform queries and conduct analyses.

0214 The Registry shall implement versioning controls to record all changes and maintain audit trail of all modifications.

0215 The Registry shall implement security controls to prevent unauthorised access, data tampering, or credit counterfeiting.

0216 Credit account records shall be encrypted and shall require multi-factor authentication for any ownership changes.

0217 Annual transparency reports shall be published showing: (a) total credits issued by Methodology and vintage; (b) total credits retired by use category; (c) Project statistics by geography and Methodology; (d) buffer pool status; and (e) safeguards and sustainable development performance.

0218 The Registry shall be backed up daily and shall have geographic redundancy to ensure disaster recovery.

0219 The Registry shall achieve 99.9% uptime availability and shall have documented disaster recovery procedures.

0220 Registry downtime exceeding four hours shall be publicly disclosed and recorded in annual reports.

RETIREMENT AND CLAIMS

0221 Credit retirement shall be the permanent and irreversible removal of a credit from circulation.

0222 Credits may be retired by any Account Holder with ownership of the credit, including Project Developers, Credit Buyers, intermediaries, or any authorised party.

0223 Retirement shall be executed through the MCC Registry platform and shall be immediately recorded.

0224 Once retired, a credit shall be permanently marked as retired and shall not be transferred, re-issued, or recirculated under any circumstances.

0225 Retirement is an irreversible action. No mechanism shall exist to reverse or undo a retirement.

0226 A Retirement Certificate shall be automatically generated upon credit retirement, recording: (a) credit serial number; (b) credit Type and quantity; (c) retirement date; (d) retiring Account Holder; (e) certification number; and (f) timestamp.

0227 Retirement Certificates shall be publicly searchable in the Registry and may be downloaded by the retiring Account Holder.

0228 Claims based on MCC credits shall only be made after the credits have been formally retired.

0229 No claims shall be asserted on the basis of owned but non-retired credits.

0230 Claims must be substantiated with retired credits. Each claim must be accompanied by evidence of credit retirement.

0231 The MCC Claims and Disclosure Code (MCC-600) shall specify all rules governing claims discipline and substantiation requirements.

0232 Claims discipline shall strictly prohibit certain assertions: (a) specific regulatory programme eligibility claims such as asserting credits are eligible for CORSIA or International Carbon Market (Article 6); (b) specific regulatory scheme compliance or compatibility claims; (c) 'Compliance Market Eligible' unless corresponding adjustment is confirmed; (d) assertions that a credit meets undefined or unknown regulatory requirements; or (e) assertions of specific regulatory programme recognition without written evidence.

0233 Permitted claims shall be limited to factual, substantiated statements: (a) 'This credit represents one tonne of CO_2 equivalent reduction/removal'; (b) 'Designed to satisfy international climate ambition' (if structured as such); (c) 'Structured for future assessment by [specific framework]' (if technically designed for such assessment); (d) 'Delivers co-benefits in [specified SDGs]' (if verified); (e) 'Meets MCC Safeguards Standards' (if verified); or (f) other claims substantiated by MCC documentation.

0234 No party shall claim that an MCC credit has been approved by, recognised by, or is compatible with any governmental, regulatory, or international programme without written evidence of such recognition.

0235 Marketing materials making claims about MCC credits shall be reviewed for claims discipline compliance before publication.

0236 The Compliance Function shall monitor credit retirement records and public claims for violations of claims discipline.

0237 Claims discipline violations shall be investigated and may result in participant suspension or programme exclusion.

0238 Credit Buyers shall be required to acknowledge understanding of claims discipline requirements when opening Registry accounts.

OPERATIONAL HISTORY AND TRACK RECORD

0239 MCC acknowledges its status as a new programme established in 2026.

0240 MCC shall not seek external programme recognition, certification, or approval by third-party verification bodies or governmental authorities until a demonstrated operational track record has been established.

0241 The minimum required operational track record shall be two years of full operation from the date of first Credit Issuance.

0242 MCC operational phases shall be defined as: (1) Foundation Phase (launch through Month 3): programme establishment, governance operationalisation, and platform development; (2) Pilot Project Phase (Months 4-12): registration and crediting of initial pilot Projects under close monitoring; and (3) Full Operations Phase (Month 13+): full-scale programme operation with all methodologies active.

0243 During the Pilot Project Phase, no more than ten Projects shall be registered simultaneously.

0244 All pilot Projects shall be subject to enhanced scrutiny including quarterly review by the Governance Board and documented lessons learned.

0245 All pilot Projects shall include comprehensive data collection and monitoring to inform programme refinement.

0246 The transition from Pilot to Full Operations shall require Governance Board approval, demonstrating that critical technical and operational issues have been resolved.

0247 Track record metrics shall include: (a) Project pipeline (registered and active Projects); (b) verification completion rates (percentage of Projects with completed Verification); (c) credit issuance volumes by Methodology and vintage; (d) safeguards performance (assessments completed, grievances reported, remediation rates); (e) sustainable development performance (SD scores and SDG indicator achievements);

(f) verification quality (VVB assessment quality scores); (g) registry performance (system uptime and transaction accuracy); and (h) participant satisfaction (surveys and feedback).

0248 Track record metrics shall be published quarterly in transparent performance reports available to all stakeholders.

0249 Programme-wide lessons learned shall be documented and incorporated into periodic revisions to MCC-100 and related standards.

0250 External capacity-building activities shall be conducted during the Track Record period, including training for Project Developers, VVBs, host country authorities, and other stakeholders.

0251 The Governance Board shall conduct a formal Track Record Assessment at month 24, evaluating programme readiness for external recognition applications.

0252 The Track Record Assessment shall be published as a comprehensive report and shall form the basis for any subsequent applications for external programme recognition.

0253 MCC-100 shall be read in conjunction with MCC-ORS-v1.0 (Operational Readiness Standard), which provides detailed track record metrics, assessment procedures, and programme maturation requirements.

0254 During and after the Track Record period, MCC shall maintain a commitment to continuous improvement, learning, and adaptive management.

0255 Programme amendments identified as necessary during the Track Record period shall be implemented promptly without waiting for formal revision cycles.

0256 All Track Record documentation, performance reports, and lessons learned shall be maintained in a publicly accessible archive.

AI GOVERNANCE

0257 Artificial Intelligence (AI) technologies may be used in MCC operations only in specifically approved use cases and under defined governance constraints.

0258 AI usage shall be assistive only. AI shall never be sovereign or make final approval, rejection, or issuance decisions.

0259 Seven use cases shall be approved for AI application: (1) completeness check automation (identifying missing PDD sections); (2) data quality validation (checking monitoring data consistency); (3) baseline conservatism assessment (testing conservatism ranges); (4) quantification calculation verification (verifying mathematical calculations); (5) cross-programme duplicate check (screening for duplicate registrations); (6) claims discipline monitoring (identifying potential claims violations); and (7) registry search and analysis (enabling Registry querying and analysis).

0260 AI systems shall not be used for: (a) additionality assessment (requires human judgment); (b) risk categorisation decisions (requires professional judgment); (c) Project registration decisions (requires governance authority); (d) credit issuance decisions (requires governance approval); (e) safeguards assessments (requires expert judgment); (f) VVB accreditation decisions (requires Oversight Committee discretion); or (g) sanctions or disciplinary actions (requires due process).

0261 Confidence thresholds shall be defined for each approved AI use case, specifying the minimum confidence level required before AI output is deployed.

0262 Confidence thresholds shall range from 85% to 99% depending on the use case criticality.

0263 Where AI confidence falls below defined thresholds, the assessment shall be flagged for human review before proceeding.

0264 Mandatory human review gates shall be implemented for all AI outputs in critical functions, including: (a) any result affecting Project eligibility; (b) any potential non-compliance finding; (c) any integrity risk flagging; and (d) any registry transaction affecting credit status.

0265 Full AI audit trail shall be maintained for all AI applications, recording: (a) input data and source; (b) algorithm version and parameters; (c) confidence scores; (d) output results; (e) human reviewer name and decision; (f) timestamp; and (g) any divergence between AI output and final human decision.

0266 AI audit trails shall be maintained for not fewer than seven years following Project completion.

0267 AI systems shall be subjected to annual external validation testing to verify accuracy, fairness, and absence of bias.

0268 Validation testing results shall be published in annual performance reports.

0269 Any AI system with documented bias or systematic errors shall be immediately suspended pending remediation.

0270 AI systems shall not be used to make determinations about individual applicants that could result in programme exclusion or sanctions without human expert review.

0271 Project Developers, VVBs, and other participants shall be notified when AI systems have been applied to their submissions.

0272 Appeal processes shall allow parties to challenge AI-generated outputs and request human review.

0273 AI governance decisions shall be made by the Governance Board and shall be reviewed annually.

0274 MCC shall maintain a principle of 'AI Explainability': all AI-generated conclusions and recommendations shall be accompanied by human-readable explanation of the reasoning.

0275 Where AI systems are used in external-facing functions (Registry, claims monitoring), users shall be informed that AI assistance is being applied.

COMPLIANCE AND ENFORCEMENT

0276 MCC shall maintain a comprehensive compliance and enforcement framework to ensure integrity and rule adherence.

0277 The Compliance Function shall be independent and shall have authority to investigate non-compliance, recommend enforcement action, and report directly to the Governance Board.

0278 Non-compliance shall be defined as any material breach of MCC-100 or related MCC programme documents by a participant.

0279 Non-compliance consequences shall be imposed progressively based on severity, frequency, and intent, and shall include: (a) written warning; (b) conditional participation (continued participation with specified restrictions); (c) temporary suspension (participant unable to register new Projects or receive new Credits, for specified period not exceeding 12 months); (d) permanent suspension (participant permanently barred from MCC participation); (e) credit cancellation (issued credits cancelled, for specific identified breaches); and (f) programme exclusion (participant and related parties permanently excluded, for egregious violations).

0280 Warning shall be issued for isolated, minor violations and shall document the non-compliance and requirement for cure.

0281 Conditional participation may restrict specific activities (e.g., no new registrations) while allowing other activities to continue.

0282 Temporary suspension shall prohibit new Project registrations, new Credit Issuances, and new transactions for specified period.

0283 Permanent suspension shall prohibit all new activities but may permit completion of existing Projects.

0284 Credit cancellation shall remove issued credits from circulation and shall be recorded in Registry as 'Cancelled - Compliance Action'.

0285 Programme exclusion shall prohibit participation by the participant and any related party, defined as any entity where the excluded participant has >10% beneficial ownership or control.

0286 Programme exclusion decisions shall be made only by the Governance Board and shall be subject to formal appeal procedures.

0287 Enforcement decisions shall be made by the Compliance Function (investigations), the relevant governance body (decision), and the Appeal Officer (appeals).

0288 Before imposing any enforcement action other than warning, the Compliance Function shall provide written notice of the alleged non-compliance, specify supporting evidence, and provide the participant not fewer than thirty calendar days to respond.

0289 Participants may submit written response, request hearing, and provide evidence in their defence before enforcement decision is made.

0290 The Appeals Process shall be governed by MCC-700 (Governance and Appeals) and shall provide independent review of enforcement decisions.

0291 Appeals shall be filed within thirty calendar days of enforcement decision, with appellate decision issued within sixty days.

0292 Appellate decisions shall be made by the Appeal Officer (single formal appeal) or the Governance Board (final appeal), and shall be final and binding.

0293 Suspended or excluded participants may request reinstatement after curing non-compliance (temporary suspension) or after five years (permanent suspension) by submitting reinstatement request to the Governance Board.

0294 Reinstatement shall require: (a) demonstration of remedial action and non-compliance cure; (b) written commitment to compliance; (c) payment of reinstatement fee; and (d) Governance Board approval.

0295 Non-compliance investigations shall be conducted confidentially but shall be documented in investigation records maintained by the Compliance Function.

0296 Upon completion of investigations, findings shall be reported to the relevant governance body. Final enforcement decisions shall be public unless confidentiality is specifically granted by the Governance Board for business-sensitive information.

0297 Registry shall record enforcement status for all participants, displaying warnings, suspensions, and exclusions publicly.

0298 Egregious violations including fraud, falsification of documents, deliberate double counting, and corruption shall be referred to national authorities and may result in immediate programme exclusion without warning.

Violation Type	Severity	Potential Consequences	Appeal Right
Isolated minor breach	Low		

Warning
Yes
Repeated minor breach
Medium
Conditional participation
Yes
Material non-compliance
High
Temporary suspension (3-12 mo)
Yes
Systematic non-compliance
Very High
Permanent suspension
Yes, with Governance Board review
Fraud or deliberate misconduct
Critical
Programme exclusion
Limited appeal; subject to investigation
Credit-related fraud
Critical
Cancellation + exclusion
Limited appeal; subject to investigation

PROGRAMME STANDARD SECTION MAP

Section
Gap Addressed
Policy Reference
1. Scope and Application
Core programme definition and methodology framework
MCC-100, Section 1
2. Programme Governance
Governance structure, separation of functions, 9 defined roles
MCC-100, Section 2; MCC-700
3. Project Eligibility and Registration
Registration workflow with 8 sequential stages, revision loop and prioritised sequencing
MCC-100, Section 3
4. Environmental and Social Safeguards (NEW)
Mandatory safeguards for all Projects; risk categorisation; FPIC for Indigenous Peoples
MCC-100, Section 4; MCC-ESS-v1.0
5. Sustainable Development Contribution (NEW)
SD assessment and verification; SDG alignment; SD Gold designation
MCC-100, Section 5; MCC-SDCF-v1.0
6. Host Country Authorisation (NEW)
LoA requirements; category-specific CA commitments
MCC-100, Section 6; MCC-HCA-v1.0
7. Corresponding Adjustments and Double Counting (NEW)
Prevention of 5 types of double counting; CA tracking; serial number uniqueness
MCC-100, Section 7; MCC-CADCP-v1.0
8. Validation and Verification

	Independent third-party assessment; VVB accreditation and independence	MCC-100, Section 8; MCC-400, VVB Terms
9. Credit Issuance	7 mandatory prerequisites; serial number format; buffer calculation	MCC-100, Section 9; MCC-800
10. Buffer Pool and Permanence (NEW)	Programme-level risk reserve; 5-factor risk assessment; permanence monitoring	MCC-100, Section 10; MCC-BPM-v1.0
11. Registry and Transparency	Public registry with searchability; data feeds; transparency reporting	MCC-100, Section 11; MCC-800
12. Retirement and Claims	Permanent credit retirement; claims discipline; prohibited claims	MCC-100, Section 12; MCC-600
13. Operational History and Track Record (NEW)	2-year track record requirement; pilot phase; formal maturation assessment	MCC-100, Section 13; MCC-ORS-v1.0
14. AI Governance	7 approved use cases; confidence thresholds; mandatory human review gates	MCC-100, Section 14
15. Compliance and Enforcement	Non-compliance consequences; appeal process; dispute resolution	MCC-100, Section 15; MCC-700

CREDIT ISSUANCE PREREQUISITES

Prerequisite	**Required By**	**Gate Type**	**Reference**
Completed Verification Report	Review Authority	Quality Gate	Section 8; MCC-400
Positive Verification Statement	VVB/Review Authority	Technical Gate	Section 8
Safeguards Clearance Confirmation	Compliance Function	Safeguards Gate	Section 4; MCC-ESS-v1.0
Host Country Authorisation Verification	Registry Manager	Authorisation Gate	Section 6; MCC-HCA-v1.0
Corresponding Adjustment Status Recorded	Registry Manager	Data Gate	Section 7; MCC-CADCP-v1.0
Buffer Pool Contribution Calculated	Registry Manager		

Calculation Gate
Section 10; MCC-BPM-v1.0
No Active Non-Compliance
Compliance Function
Compliance Gate
Section 15
Governance Approval
Review Authority
Authority Gate
Section 2; MCC-700

SAFEGUARDS RISK CATEGORIES

Category	Risk Level	ESIA Required	ESMP Required	FPIC If Indigenous Present	Annual Monitoring
A	High	Full Environmental and Social Impact Assessment	Comprehensive ESMP	Yes, documented	Yes, annual
B	Medium	Simplified Assessment	Streamlined ESMP	Yes, documented	Yes, annual
C	Low	Self-Declaration	Not required	Consultation only	No

APPENDIX A — VERSION CONTROL AND SUPERSEDED TEXT

This Appendix records the amendment history of MCC-100 and reproduces superseded provisions in full, so that the text in force at any past date can be reconstructed from this document alone.

A.1 Amendment history

Version	Date	Instrument	Adopting decision	Effect

2.0
March 2026
MCC-100 Programme Standard v2.0
Governing Board
Base text. Integrated safeguards, sustainable development contribution, host country authorisation, corresponding adjustments, buffer pool and operational roadmap.
2.1
17 August 2026
Amendment 1 — Revision Loop, Registration Workflow Stages and Prioritised Sequencing, v1.0
D-2026-08-01 (MCC-BDR-2026-002), two-thirds majority under cl. 0021
Replaced cl. 0050 and cl. 0061; inserted cll. 0050.1–0050.5, 0053.1–0053.8, 0057.1, 0061.1–0061.3; amended the Section 3 stage table and the Programme Standard Section Map; interpretive direction on cl. 0046.

A.2 Superseded text

Clause 0050, as it stood in MCC-100 v2.0 (March 2026) until 17 August 2026:

> 0050 The Project registration workflow shall comprise seven sequential stages: DRAFT (internal preparation), SUBMITTED (application received), COMPLETENESS_CHECK (administrative verification), TECHNICAL_REVIEW (substantive assessment), STAKEHOLDER_CONSULTATION (public disclosure and feedback period), GOVERNANCE_REVIEW (decision-making), and REGISTERED (official listing).

Clause 0061, as it stood in MCC-100 v2.0 (March 2026) until 17 August 2026:

> 0061 A Project may transition from DRAFT to REGISTERED stage only by following the complete seven-stage workflow without skipping any mandatory stage.

Section 3 stage table, as it stood in MCC-100 v2.0: the table did not contain a SAFEGUARDS_SCREENING row; COMPLETENESS_CHECK was followed directly by TECHNICAL_REVIEW.

Programme Standard Section Map, entry for Section 3, as it stood in MCC-100 v2.0: “Registration workflow with 7 sequential stages”.

A.3 Transitional provision (Amendment 1)

Projects standing at any pre-registration stage on 17 August 2026 are migrated to the eight-stage workflow at their current stage. A Project standing at COMPLETENESS_CHECK on that date proceeds to SAFEGUARDS_SCREENING. No Project is returned to DRAFT solely by reason of Amendment 1, and no cure period running on that date is shortened by it.

A.4 Related instruments

Clause 0061.1 is to be read with MCC-850 Amendment 2 (Automated Completeness Report, Applicant Disclosure and Degraded Mode), adopted by decision D-2026-08-02 and consolidated in MCC-850 v1.1, which governs the automated report referred to in that clause.

A.5 Note on the basis for this Appendix

The editorial note to Amendment 1 directs that superseded clause text be preserved in the version-control appendix of MCC-100 v2.2 “in accordance with clause 0249”. Clause 0249 concerns the documentation of programme-wide lessons learned and their incorporation into periodic revisions; it does not in terms require a version-control appendix. This Appendix is therefore maintained on the basis of clause 0040 (publication of decisions), clause 0256 (publicly accessible archive of programme documentation) and the express direction in the editorial note to Amendment 1. It is recommended that a future amendment insert an express document-control and version-history clause into Section 1, and correct the cross-reference in the editorial note.