

MARINE CONSERVATION CREDITS

MCC-850 — Amendment 1

Repeal and Replacement of Article 28 (AI Visibility to VVBs)

Version 1.0 — Adopted 17 August 2026

Status: ADOPTED by the Governing Board on 17 August 2026 under the Article 5 procedure, decision D-2026-08-10 (MCC-BDR-2026-002).

Entry into force: 17 September 2026, as determined by the Programme Administrator under the Entry into Force provision below.

Preamble

This Amendment amends MCC-850 (AI Governance Standard, v1.0, 23 March 2026) by repealing Article 28 (AI Visibility to VVBs) and replacing it with a new Article 28 (Structured AI Visibility to VVBs).

The original Article 28 prohibited VVB visibility to AI analysis prior to validation or verification, on the rationale that prior knowledge of AI findings could unconsciously bias the VVB. That position is incompatible with (i) the AI-augmented VVB engagement model introduced by MCC-400 Addendum 1 (Section 14), (ii) the M08 VVB Portal architecture in the MCC Product Architecture / AI Blueprint v2.0, and (iii) the cost-reduction rationale that underpins MCC programme positioning.

This Amendment substitutes the blind-visibility rule with a structured-visibility rule, in which the VVB sees AI output but is required to document deviations and concurrences, and is subject to statistical bias detection and witness audit. Independence is preserved through transparency rather than concealment.

Operative Provisions

Repeal

Article 28 of MCC-850 v1.0 is hereby repealed in its entirety.

Replacement

The following Article 28 is inserted in MCC-850, with effect from the entry-into-force date specified by the Programme Administrator:

Article 28: Structured AI Visibility to VVBs

Accredited VVBs shall have structured visibility to AI Analysis Layer outputs through the M08 VVB Portal in accordance with this Article and Section 14 of MCC-400. AI outputs are programme-provided inputs to the VVB engagement; they are not substitutes for the VVB's independent professional judgement.

The following sub-articles operationalise this rule:

Article 28.1: Scope of Visibility

Upon engagement assignment under MCC-400 Section 9, the VVB shall be granted access to the AI Analysis Sidebar for the project. The Sidebar shall include: (a) per-section completeness scores; (b) confidence tiers under Article 15; (c) risk flags and their severity classification under Article 16; (d) cross-reference findings under Article 18; and (e) recommendations under Article 19.

Article 28.2: Bias Controls

The VVB shall apply the bias controls specified in MCC-400 Section 14.4. In particular, the VVB shall document each deviation from an AI finding and each concurrence with an AI finding, in the form prescribed by the Programme Administrator. Concurrence does not relieve the VVB of independent sampling.

Article 28.3: Audit Trail

Every access to AI Analysis Layer output by a VVB user shall be logged in the immutable audit trail required by MCC-800 Article 65. Logs shall include user identity, timestamp, and the specific output viewed. Logs shall be available to the Programme Administrator and to peer reviewers under MCC-400 Section 11.

Article 28.4: Statistical Detection of Rubber-Stamping

The Programme Administrator shall maintain a statistical model that flags VVB-engagement patterns indicative of insufficient independent verification, including but not limited to: (a) concurrence rates materially above the cohort median; (b) absence of contrary findings across consecutive engagements; and (c) report turnaround times materially below the cohort median. Flagged engagements shall be subject to enhanced peer review and may trigger witness audit under MCC-400 Article 26.

Article 28.5: Pre-Submission Visibility Excluded

AI Analysis Layer output shall not be disclosed to the VVB before the project developer's final submission has been received and locked. AI outputs generated against draft submissions, applicant working documents, or pre-submission consultation are excluded from the VVB Sidebar.

Article 28.6: Project Developer Visibility

The project developer's right to see AI Analysis Layer output is governed by Article 27. Nothing in this Article shall be construed to give the VVB visibility to applicant-confidential output not also available to the project developer.

Consequential Amendments

Article 3 of MCC-850 (Relationship to Other MCC Standards) shall be amended to add the

following:

"This Standard is read in conjunction with MCC-400 Section 14 (AI-Augmented Validation and Verification), which operationalises the AI Analysis Layer in the VVB engagement context. Where this Standard and MCC-400 Section 14 address the same matter, the more specific provision controls."

Transitional Provision

Engagements assigned to a VVB before the entry-into-force date of this Amendment shall continue under the original Article 28 (blind visibility) unless the Programme Administrator and the VVB jointly elect to migrate the engagement to the structured-visibility regime. Engagements assigned on or after that date shall operate under the new Article 28.

Entry into Force

This Amendment was adopted by the Governing Board on 17 August 2026 under the Article 5 procedure (decision D-2026-08-10, record MCC-BDR-2026-002). It enters into force on the date specified by the Programme Administrator following Board approval, published through the MCC Transparency Layer with at least thirty (30) days notice.

Programme Administrator determination. The Programme Administrator has specified **17 September 2026** as the entry-into-force date, being thirty-one days from adoption. Notice shall be published through the Transparency Layer no later than 17 August 2026.

Dependency. Articles 28.1 and 28.2 cross-refer to MCC-400 Section 14 and Section 14.4, which exist only by virtue of MCC-400 Addendum 1 (AI-Augmented Validation and Verification), presently at draft v0.2 and not adopted. Article 28.2 is inoperable until that Addendum is in force. Where MCC-400 Addendum 1 has not entered into force by 17 September 2026, the Programme Administrator shall postpone the entry into force of this Amendment by fresh notification through the Transparency Layer rather than allow Article 28 to enter into force with an inoperable cross-reference.

Operational restriction pending entry into force. Until this Amendment is in force, no VVB user shall be granted access to the AI Analysis Sidebar or to any other disclosure of AI Analysis Layer output before that VVB has submitted its validation or verification report. The original Article 28 governs in the interim.

Editorial notes

Incorporation. This Amendment is incorporated into MCC-850 v1.1. The original Article 28 text and rationale are preserved in the version-control appendix of MCC-850 v1.1.

Cross-reference correction required. Article 28.3 refers to "peer reviewers under MCC-400 Section 11". Peer review is governed by MCC-400 Section 9.6; Section 11 of MCC-400 governs performance monitoring and evaluation. The text is reproduced here as adopted. The reference

should be corrected to Section 9.6 by a future amendment, and until then Article 28.3 is to be read as referring to peer reviewers appointed under MCC-400 Section 9.6.