

# Complaint: Verra's non-compliance with ICVCM grievance mechanism rules

## I. Introduction

We are writing to submit a complaint pursuant to Section 6 of the Integrity Council for Voluntary Carbon Market's (ICVCM) Core Carbon Principles (CCP), Assessment Framework and Assessment Procedure (January 2024)<sup>1</sup> regarding Verra's "review" of Human Rights Watch's (HRW) grievance related to Cambodia's Southern Cardamom REDD+ project.

We assert that Verra, an ICVCM-approved entity, does not comply with the ICVCM Assessment Framework provisions on grievance mechanisms. Specifically *Assessment Framework Criterion 1.2: Public engagement, consultation and grievances* for failing to comply with requirement (a)(2) which states that the process for addressing grievances "***shall ensure [...] impartiality***".

## II. Background

1. Cambodia's Southern Cardamom REDD+ Project, jointly implemented by the Ministry of Environment and the non-governmental conservation organisation, Wildlife Alliance (WA), was certified by Verra in 2018 under the Verified Carbon Standard (VCS) and the Climate, Community and Biodiversity standard (CCB), and certified under the Sustainable Development Verified Impact Standard (SD VISta) in 2021.
2. Human Rights Watch conducted a two-year investigation into the Southern Cardamom project and documented multiple human rights violations against the Indigenous Chong communities impacted by the project. Several of these violations also appeared to infringe Verra's own standards.

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<sup>1</sup> Section [6.1 - 6.7](#) entitled "[Complaints \(programs and stakeholders\)](#)", pgs 132-33.

3. Human Rights Watch contacted Verra in May 2023 and, in response, Verra conducted a “review” – or a grievance redress process – and suspended the project in June 2023. Verra reinstated the project in September 2024.
4. To conduct its review, Verra asked several Validation/Verification Bodies (VVBs) – SCS Global Services, Aster Global and Aenor – all of whom had previously provided validation and / or verification services for the project<sup>2</sup> – to review their earlier work in light of HRW’s allegations. Verra subsequently examined their respective reports on the matter<sup>3</sup>. Verra also asked Wildlife Alliance to provide information. Therefore, all parties in which Verra engaged to review HRW’s allegations were involved in the evaluation of the project at an earlier stage, and would have suffered (financially and/or reputationally) from a conclusion that would confirm HRW’s allegations. Verra staff did not travel to Cambodia to conduct fact-finding.
5. Verra is ICVCM-approved. This means that Verra is required to have a functioning grievance mechanism that is compliant with ICVCM’s Core Carbon Principles (CCPs). Specifically, pursuant to relevant ICVCM rules, Verra must *“have a process for addressing grievances, for which the process shall be clear and transparent, ensure **impartiality** [emphasis added] and where appropriate, confidentiality, in the filing and resolution of grievances and for which any applicable fees shall not impede legitimate access to the grievance process by civil society organisations or of Indigenous Peoples and Local Communities (IPs & LCs)”*<sup>4</sup>.
6. In its grievance redress policy, Verra states that it is *“committed to the timely, effective, and **impartial** [emphasis added] resolution of grievances (i.e., complaints and appeals) in relation to all programs managed by Verra”*<sup>5</sup>. On paper, the rule appears to comply with ICVCM requirements. The problem, however, is with Verra’s compliance with the rule *in practice* as evidenced by its handling of HRW’s grievance.

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<sup>2</sup> All documents pertaining to earlier validation and verification of the project can be found: [here](#); [here](#); [here](#); and [here](#).

<sup>3</sup> The responses can be found in Verra’s [press release](#): “Verra Reinstates Southern Cardamom REDD+ Project” (10 September 2024).

<sup>4</sup>[Core Carbon Principles Assessment Framework and Procedure](#).

<sup>5</sup>The grievance policy (updated in September 2024) can be found here: [Verra Releases New Grievance Redress Policy - Verra](#).

### III. Verra's non-compliance with ICVCM rules

7. Verra's review of Human Rights Watch's allegations of various human rights violations of the Indigenous Chong communities impacted by Cambodia's Southern Cardamom REDD+ project ***lacked impartiality*** – as required by ICVCM's CCP rules – for the following reasons:
  - a. **Verra did not employ an impartial third party** – such as an external auditor *not* involved in any of the prior validation or verifications – to review HRW's allegations.
    - i. VVBs SCS Global Services, Aster Global and Aenor are not impartial parties. Verra relied on these VVBs to respond to HRW's claims even though they previously provided validation and / or verification services at earlier stages of the project. This situation creates an inherent conflict of interest since it's in their reputational and financial interest to 'overlook' any problems associated with a project that they previously approved or verified.
    - ii. The only other party which Verra relied on to assess HRW's allegations was Wildlife Alliance, the project implementer.
  - b. **Verra itself is not an impartial party.** Though Verra did not directly investigate HRW's allegations itself (e.g. travelling to Cambodia to further investigate, etc.), it had complete discretion over the outcome of the investigations. In this capacity, it issued recommendations and remedial actions after reviewing reports from the aforementioned VVBs and WA that focused on forward-facing improvements and internal changes to WA. Verra's position is not impartial. Verra approved the project in the past and has since issued millions of credits. It therefore faces a reputational risk if it was to confirm that the project infringed on human rights, in addition to a financial risk from (1) forgone revenues from future issuance of credits and (2) implications for its buffer pool if it had to tap into it to make up for wrongfully issued credits.

## IV. Further actions

8. We therefore request that ICVCM take immediate action to evaluate the real-world effectiveness of Verra's grievance mechanism and how it might or might not reflect the rules which Verra adopted on paper and which were used to grant the CCP-eligibility status.
9. Beyond this specific case, we strongly encourage ICVCM to develop a process for assessing programs' implementation of, and compliance with, the programme requirements that have been used to assess them for CCP-eligibility. This could include random spot-checks of projects and processes. The current case illustrates the risk for ICVCM of relying purely on written commitments without assessing the real-world use of programme requirements.

## Contact

Lindsay Otis  
Policy Expert - Global Carbon Markets  
[lindsay.otis@carbonmarketwatch.org](mailto:lindsay.otis@carbonmarketwatch.org)

