

WILL's contribution to VERRA's consultation about the use of Projected Carbon Unit (PCU) formerly called Early Finance Carbon Unit (EFCU)¹
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The global health crisis we are experiencing poses particular challenges adding up to the climate crisis, and which are just as urgent. As April 2022, the IPCC recommended reducing GHG emissions by 45% in 2030 compared to 2010², the reference year. This represented nearly 200 billion tons of GHG emissions to be permanently deleted by 2030. And this is only the beginning of the path towards the global target of 2050, where several stakeholders have committed to achieving a "carbon netzero"³. Beyond this date, all states and nations will need to remain carbon neutral for several decades and in a sustainable way. The objectives must therefore be maintained:

1. Ambitious cumulative annual reduction targets, locally, nationally and internationally;
2. Ambitious cumulative annual sequestration targets, locally, nationally, and internationally for the next 100 years, at least until 2120.

Will Solutions (WILL) has developed its voluntary carbon markets (VCM) experience since 2007 (please refer to Appendix 1). A first step was to assess and then develop the design of a methodology (VM0018) under the VCS program version 3.0, which operates in open source. Then, we have implemented a first group project with our first 4 quantifications (Monitoring Report) and completed verification. We realized the first sales of these verified carbon credits directly to end buyers, through international brokers (secondary market) and through new emerging digital trading platforms. We have distributed our offset credits directly to individual consumers, NGOs, corporations in several economic sectors. So, we bring to TSVCMA a full, real and field experience of the life cycle management of a carbon credit⁴, from a methodology design, the qualification, the quantification of a GHG reduction, its verification, and its serialization up to its sale to an end-buyer, who will retire it.

¹ <https://verra.org/public-consultation-projected-carbon-units/>

² https://www.ipcc.ch/site/assets/uploads/2022/04/IPCC_AR6_WGIII_PressRelease_English.pdf

³ Netzerocarbon : <https://www.wri.org/blog/2019/09/what-does-net-zero-emissions-mean-6-common-questions-answered>

⁴ Taskforce on Scaling Voluntary Carbon Markets, November 2020, page 24

Our contribution to the VERRA questions about the use of PCU, is summarized below:

PCUs must be approved and used to finance, in particular, agglomerations (clusters) of small-scale reduction microprojects (change of behavior, multiple technologies on several scopes 3, 13 and 7, as GHG emission reductions/removals(ERRs)) carried out by the operators of tens of thousands of buildings (SMEs , municipalities and other organizations), grouped together on a homogeneous and jurisdictional territory, using automated traceability to collect, validate and quantify their eligible GHG reductions.

These tens of thousands of organizations do not, individually, have the internal resources (financial, knowledge and sufficient volume of GHG reductions) to participate in climate actions and access Voluntary Carbon Markets (VCMs). The financial investment to create and set up this type of cluster's project requires a major investment⁵ in order to develop a cluster including the use and the configuration of traceability platform using different technologies such as the Internet of Things (IoT), Artificial Intelligence (AI) and Blockchain to address and to overcome some issues such as; additionality (at financial and uncommon practice), double counting, overlapping period of the monitoring report, all with the best integrity and transparency without limiting the mass movement on recruitment of participants and stimulation of their eligible GHG reduction projects. **PCU** should not be limited to Nature Climate Solution (NCS) projects.

REQUESTED FEEDBACK as listed on document dated of May 3rd 2022, on the proposed changes and on the following questions:

1. Will proposed PCU design (Section 2) likely enable early project investment as well as support PCU buyers in reducing contracting and delivery risks and facilitate credible communication of progress toward net-zero targets or other climate commitments? *Our answer to the point 2.3: we agreed to define the period of non-NCS such as the type of project mentioned above equal to the first project crediting period; either 10 years, fixed or 7 years for a project that chooses a 7-year, twice-renewable crediting period, consistent with the baseline reassessment period for these projects.*
2. Do you have any concerns about the ease of use or environmental integrity of the proposed PCU design (Section 2)? If so, what are your concerns and what adjustments should be considered to further strengthen the proposed PCU design? *Our answer is at this time no we have no concern, and we support the point 2.9 as we have observed a strong market demand to finance cluster project oriented to the demand side⁶ with a broader participation of all stakeholders of the civil society.*
3. The proposed maximum PCU assignment period for NCS sequestration (removal) projects, including afforestation/reforestation projects, is 40 years. Do you agree with this timeframe for NCS removal projects? If not, do you think a longer timeframe (e.g., 60 years) or a shorter timeframe (e.g., 20 years) would be more appropriate? Kindly provide your rationale. *No specific comment*
4. This proposal includes a maximum PCU assignment period for non-NCS (e.g., technological) sequestration (removal) projects of 40 years, considering the significant upfront investment needed for these projects (e.g., Direct Air Carbon Capture & Storage) to be deployed. However, unlike NCS sequestration projects, these technological projects can immediately generate emission removals once operational. Do you agree with this timeframe for technological removal projects? If not, do you think a longer timeframe (e.g., 60 years) or a shorter timeframe (e.g., 20 years) would be more appropriate? Kindly provide your rationale. *No specifics comment*

⁵ Estimate around 20 million US/cluster project. WILL estimated a potential of up to 2000 cluster projects.

⁶

<https://secureservercdn.net/198.71.233.33/ljr.809.myftpupload.com/wp-content/uploads/2019/07/Carbon-credit-chronicles-3-Having-an-impact-on-demand.pdf>

5. The PCU assignment period is described as a static timeframe with a fixed start date and end date. Should project proponents have the option to extend a project's PCU assignment period, contingent on re-validation of relevant project documents? For example, five years past the project's start the proponent may be able to extend the PCU assignment period by five years into the future after re-validation of key parameters, including the project's ERR projections. *Our answer is yes.*
6. Are the updates for PCU implementation (Section 3) clear? Do you have suggestions to clarify or better define how PCUs will be implemented within the VCS Program? *At this time it seems clear.*
7. Consider that PCUs will enable project proponents to assign and transfer carbon units earlier in the project development cycle than otherwise possible. To ensure PCUs are underlied by robust projections, should project proponents or VVBs provide any additional information not already prompted in the VCS project description and validation report templates (Section 3.5)? *One comment on the PD Template with the intention to add some details estimation on section 1.10, it seems unrealistic for a non-NCS group project, which runs over 10 years, and which add up to 10 000 to 30 000 project activities instances (PAI). We recommend using the estimation made by group of generic PAI regrouped by sectorial scope.*

Hoping our comments will be useful, we remain available to discuss at your convenience.

About WILL

WILL Solutions Inc. (WILL) is a B Corp. certified Canadian private company headquartered in Beloeil, QC., Canada. The company is active in the voluntary carbon markets (VCM) sector with the Sustainable Communities' project. Since March 2020, WILL is part of the B Corp netzero2030 initiative⁷. WILL has a social philosophy based on sharing. It rests on two major pillars: democratizing access to carbon credits through the pooling of local GHG reduction projects clustered into its Sustainable Communities' project. Its first Quebec Sustainable Community (QSC) project have regrouped SMEs, small municipalities and NGOs and returning as much money as possible to these partners following the sale of carbon credits by WILL. The company has been carbon neutral since 2007 and is committed to returning 10% of its net profit to community based projects and initiatives that support sustainable development.

About Sustainable Community

Sustainable Community (SC)⁸ is a solution to democratize the voluntary carbon markets (VCM) that is validated under the VCS program administered by VERRA. SC is the first cluster project worldwide that brings together GHG reductions as a one stop solution for its members. This community business model made up of hundreds of micro-projects is intended to operate as a catalyst for local actions that engage a variety of stakeholders

⁷<https://www.bcorpclimatecollective.org/net-zero-2030>

⁸ <https://youtu.be/XCCGcUr6S2k>

SUSTAINABLE COMMUNITY CLIMATE SOLUTIONS

Will Solutions is helping millions of Businesses worldwide to take action on Climate Change

Get rewarded
for reducing your
GHGs emissions

**Find high quality VCU to
contribute by offsetting**
your GHGs emissions

Community match making
tailor made sale for Hyper
local carbon units

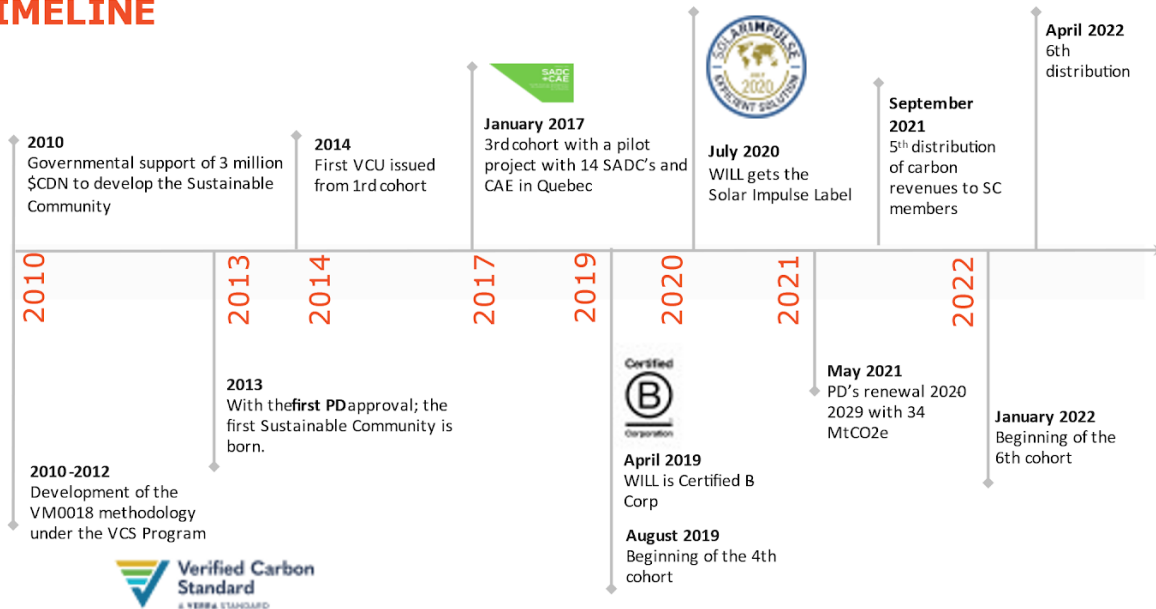


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APPENDIX 1

KPI of the result for the period 2010-2020: history and the anteriority from 2007

WILL'S ACCOMPLISHMENT TIMELINE



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The project major steps carried out so far:

1. **May 2007:** Interest of Mr. DeSousa, mayor of the Saint-Laurent borough;
2. **Autumn 2008:** Presentation of the project to the *Agence de l'Éfficacité Énergétique du Québec (AEEQ)*, under the scope of the "Technoclimat" Program;
3. **April 2010:** Selection of VCS standard, development of the technology supporting our project, online-release on the VCS's web site (Dec 2010) and double validation process (Sept. 2011);
4. **June 2010:** Signature and implementation of a contribution from AEEQ (Technoclimat Program);
5. **October 2010:** Signature of the 1st industrial park (DEL) with a financial contribution from RecycQuébec;
6. **2010:** Gouvernemental support of 3 millions CAD to develop the Sustainable Community project
7. **March 2011:** First private financing from C3E;
8. **April 2011:** First pre-sale of carbon credits;
9. **June 2011:** Contribution from Emploi-Québec in the scope of "Projets d'envergure économique";
10. **January 2012:** Deposit of the 1st technological patent for the American market at USPTO;
11. **Winter 2012:** Deployment of commercial and operational activities in the Quebec territory;
12. **Winter 2012:** Completion of the first audits ex-antes;
13. **February 2012:** VCS final acceptance in February 2012 (VM0018);
14. **March 2012:** Press release and Webinar from VCS;
15. **July 2013:** First validated cluster project under the VM0018 the Quebec Sustainable Community project (QSC);
16. **February 2014:** First Monitoring Report (quantification of GHG reduction) verified by a third recognized party under the Quebec cluster project;
17. **November 2017:** Second Monitoring Report (quantification of GHG reduction) verified by a third recognized party under the Quebec cluster project;
18. **2018:** Launch of our online B2C sales of carbon credits through PayPal and democratisation on VCM
19. **July 2019:** Third Monitoring Report (quantification of GHG reduction) verified by a third recognized party under the Quebec cluster project;
20. **2019:** Solutions Will becomes B-Corp Certified
21. **July 2020:** Solutions Will becomes Solar Impulse labeled
22. **August 2020:** Fourth Monitoring Report (quantification of GHG reduction) verified by a third recognized party under the Quebec cluster project;

23. **March-October 2020:** internal preparation for the renewal of the PD (period 2020-2029);
24. **January 2021:** Project Document’s renewal validation process by a recognized VVB.
25. **May 2021:** renewal of the QSC for the 2020-2029 with an objective of 34 million tons of CO2 stocked⁹
26. **September 2021:** 5th distribution¹⁰
27. **January 2022:** 5th Monitoring report (MR) and verification by VVB under review
28. **February 2022,** starting the 6th cohort of QSC
29. **April 22, 2022:** 6th distribution¹¹
30. **June 2022;** financing of its QSC and OSC.

CURRENT STATUS OF WILL SOLUTIONS’ QUEBEC SUSTAINABLE COMMUNITY:



150 members of the Sustainable Community as of March 31st 2020.



Over 820 greenhouse gas reduction microprojects.

[See Catalog](#)



Over **1,000 buildings** distributed in various regions of Quebec.

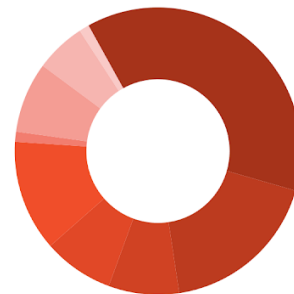


WILL’s carbon credit inventory, in 2022, amounts to

6.3 million tons of CO₂e_q reduction

The microprojects in place come from 9 different sectors.

- SME
- Municipality
- Non-profit organization
- Education
- Agriculture
- Forestry
- Tourism
- Cultural Heritage
- Other



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⁹ <https://solutionswill.com/en/renewal-of-the-sustainable-community-project-confirmed-by-vcs/>

¹⁰ <https://solutionswill.com/en/will-solutions-proceeds-to-a-5th-distribution-of-carbon-income/>

¹¹ <https://solutionswill.com/en/the-6th-income-distribution-is-here/>