

SCOPE 3 CLAIM: PUBLIC CONSULTATION

WILL's Comments on the Scope 3 Claim Text by VCMI (Voluntary Carbon Market Integrity Initiative)

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Will Solutions is pleased to participate in the Voluntary Carbon Markets Integrity Initiative (VCMI) public consultation regarding the Scope 3 Claim. As a leader in corporate decarbonization and carbon market solutions, we believe that providing feedback on this framework is essential for fostering greater transparency and accelerating global climate action.

Below, you'll find VCMI's questions highlighted in red, followed by our responses in green. For more information on VCMI and their work, visit <u>VCMI's official website</u>.

1 - The Scope 3 claim methodology is clear and easy to understand?

Answer format: Lickert's Scale

- Strongly disagree
- Disagree
- Neither agree nor disagree (WILL's answer)
- Agree
- Strongly agree

2 - Explain why. If possible, provide evidence.

In our view, the Scope 3 claim methodology is neither fully clear nor overly complex. The Voluntary Carbon Markets Integrity Initiative (VCMI) introduced the Scope 3 Claim to help companies tackle the significant challenges of reducing Scope 3 emissions, which are crucial for achieving net-zero goals. Currently, over 80% of the world's largest companies have yet to set meaningful emission reduction targets. Even those with science-based targets often struggle with Scope 3 reductions, due to high costs and the complexity of their supply chains.

The Scope 3 Claim offers a way for companies to take immediate action by purchasing highquality carbon credits while simultaneously investing in long-term decarbonization



strategies. This framework ensures companies stay aligned with science-based pathways and avoid greenwashing, with the ultimate goal of accelerating corporate decarbonization by 2038. Full implementation is targeted for 2025. By providing this balance between immediate action and long-term planning, the Scope 3 Claim could serve as an essential tool in helping businesses move forward more effectively.

3 - Comment on the scope 3 claim text

It is crucial to incorporate the financing aspect for millions of SMEs within this approach. These businesses require funding, often through carbon credits, to support their decarbonization initiatives. The use of verified, high-integrity GHG reductions—based on CCP-approved standards with a 50% gap—is vital for financing emission reduction projects, particularly in sectors like building infrastructure. This allows SMEs to act immediately without waiting for the full decarbonization of Scope 3 emissions from the 9,000 large corporations and brands committed to the SBTi.

We propose implementing a phased reduction strategy: 75% of emissions should be phased out by 2040, with 25% reserved for hard-to-abate emissions, which can be leveraged to finance decarbonization efforts among SMEs. There are no additional comments regarding the trajectory element outlined on page 31.

About Will Solutions

Will Solutions is a B Corp certified Canadian company, an expert in the voluntary carbon market since 2007, specializing in carbon emission reduction services for businesses. Our services include the measurement of corporate carbon footprints, the production and sale of carbon credits for companies committed to decarbonization (green financing), and the sale of carbon credits. Our mission is to catalyze voluntary and participatory climate action through our flagship initiative, the Sustainable Community, while being guided by our values of action, cooperation and ambition.

About the Sustainable Community

The Will Solutions Sustainable Community brings together companies, communities and organizations actively committed to reducing their GHG emissions through local ecological projects. Certified by Verra, this initiative is a carbon project that pools access to the voluntary carbon market, enabling its members to generate tangible, verified carbon credits, while contributing to collective carbon neutrality.

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