PROJECT DEVELOPER FORUM
Credible Climate Action.

Project Developer Forum Ltd.
First Floor, Waterside House
Waterside Drive, Wigan,
England, WN3 5AZ
Europe: +49 171 279 8223
office@pd-forum.net
www.pd-forum.net

Our Ref: 520a

SENT BY EMAIL

19th January 2026

FAO: Board of Directors

Gold Standard

Dear Members of the Board,

Re: **Concerns Regarding the Implementation of Paris Agreement Alignment Requirements to Existing GS4GG Projects**

The Project Developer Forum (PDF) is a global network and collective voice of over 65 companies and practitioners dedicated to developing and financing greenhouse gas emission reduction and removal projects. With a diverse membership that spans the globe, we bring together in-depth technical expertise and practical experience of international carbon markets.

We are writing regarding the recent rule update announced by Gold Standard on 6 October 2025 concerning the Paris Agreement:

(https://www.goldstandard.org/consultations/gs4gg-paris-alignment)

This communication outlines how projects using Gold Standard for the Global Goals will transition to methodologies and practices aligned with the Paris Agreement.

The PDF fully supports the intent to align Gold Standard for the Global Goals with the objectives of the Paris Agreement.

However, we have concerns regarding the timing and subsequent operationalisation of the proposed application of these new requirements and the application to registered projects that are currently operating within existing crediting periods.

Timing

The proposed implementation schedule and procedural design of this initiative raise fundamental concerns about the practical capacity of the Gold Standard, VVBs and project developers to execute the transition in a credible and timely manner.

In effect, every registered project will have to undertake quasi re-validation, alongside existing MRV processes, depending on the extent of the methodology change, which will create a surge of activity

Project Developer Forum Ltd.
19-21 Bridgeman Terrace
Wigan, England, WN1 1TD

Europe: +49 171 279 8223
office@pd-forum.net
www.pd-forum.net

in the market. Furthermore, if CDM methodologies are delayed in their transition to Article 6.4, both project developers and Gold Standard will need to devote additional time to develop and approve PA-aligned versions of these methodologies. For example, this will apply to solar lighting projects currently using the CDM methodology AMS-III.AR. or to building insulation projects applying AMS-II.E, to name a few (a detailed list could be provided by the PD Forum if required by GS). We have learnt that the market does not respond well in such circumstances and we face another backlog of approvals as we saw in the period 2020-2021. This will have a knock-on effect on costs and the ability to deliver credits on a timely basis. We have been informed by GS staff that plans are in place to manage this workload, but we have not seen any practical evidence of this.

The proposed starting point of 2026 vintages creates a structural bottleneck that could undermine confidence in the integrity of Gold Standard projects rather than strengthen it. Considering the scope of the changes, it would make more sense to stagger the implementation over a longer period of time: 2-3 years for example.

Increased risk to high-integrity projects

Revalidation, reverification, new testing protocols, downward adjustments of the number of credits will all have negative effects on project developer bottom lines. The applications of these impacts on projects, especially when they are applied mid-crediting period, have the potential to make some excellent projects economically unviable. While there is an expectation that these new requirements will be accompanied by higher credit prices, it remains unclear whether a meaningful price premium will materialize - particularly for projects with existing investors and locked-in offtake agreements - and, even if it does, whether it will be sufficient to offset the reduced volume of credits issued and additional costs for revalidation. This will mean that the planned and critical GHG reductions/removals associated with these projects will not occur. Similarly, the sustainable development impacts will also not occur.

Potential double uncertainty for investors

As we have highlighted to the GS team on multiple previous occasions, introducing new requirements or methodological shifts on registered projects during existing crediting periods, or at late stages of development when investment decisions have already been made, undermines investor confidence and project viability. This practice introduces a layer of regulatory uncertainty that is fundamentally incompatible with investment plans approved for projects using a 5-year crediting period, a crucial facet upon which carbon finance is built.

The proposed alignment approach signals major uncertainty for investors and indicates that future waves of methodological upheaval are imminent, which could result in placing project investment decisions on hold or being retracted. Project developers simply cannot operate in an environment of continual rule changes that redefine integrity. Constantly moving the goalposts does not enhance

Project Developer Forum Ltd.
19-21 Bridgeman Terrace
Wigan, England, WN1 1TD

Europe: +49 171 279 8223
office@pd-forum.net
www.pd-forum.net

integrity; but it erodes predictability, the very foundation upon which long-term carbon finance depends.

Has economic consequences with regard to pre-contracted sales

The economic consequences for existing projects can be severe. Many have structured financial models, stakeholder agreements, and operational plans around the original crediting rules and emissions reduction forecasts. Indeed, many projects are now obtaining Letters of Approval from Host Party Governments that are authorizing emissions reduction volumes for corresponding adjustments that are already a part of their national BTR planning. Imposing new requirements mid-crediting period disrupts this process and risks rendering projects financially unviable, leading to stranded assets, broken commitments to local stakeholders and beneficiaries, and reputational damage to project developers, the Gold Standard and the broader market.

Furthermore, the published alignment schedule explicitly includes land-use methodologies such as the Afforestation–Reforestation sequestration methodology, rice water-management, and the Soil Organic Carbon framework, confirming that AGR/ARR portfolios will face the same transition burden and associated commercial exposure under the 2026 vintage mandate. Without grandfathering or transition provisions and a phased implementation approach, the policy risks stranding also high-integrity AGR/ARR investments and disrupting pre-contracted delivery commitments, undermining both climate outcomes and market confidence.

Summary and Recommendations

Considering the implications of the changes, we therefore respectfully urge the Board to reconsider the overall timing of the changes and the specific retroactive application of the requirements on existing projects. We request the introduction of clear grandfathering or transition provisions that protect investments made in good faith under previously approved rules.

Such an approach would preserve investor confidence, maintain market stability, and ultimately support greater climate action.

We appreciate the opportunity to engage constructively on this issue and remain committed to working with Gold Standard to achieve Paris Alignment in a manner that strengthens environmental integrity while safeguarding the credibility and investability of the Gold Standard framework.

Yours sincerely,

Ayse Frey

Co-Vice-Chair, Project Developer Forum

On behalf of the members of the Project Developer Forum