



149 Woods Hole Road  
Falmouth, MA 02540-1644

woodwellclimate.org  
508 540 9900

info@woodwellclimate.org

Via website: [comments.cftc.gov](https://comments.cftc.gov):

February 16, 2024

Robert Sidman  
Deputy Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre, 1155 21st Street NW Washington, DC 20581

**Re: Proposed guidance on listing for trading of voluntary carbon credit derivative contracts**

Dear Deputy Secretary Sidman,

We appreciate the opportunity to provide comment on the Commission's proposed guidance regarding the listing for trading of voluntary carbon credit derivative contracts.

The Woodwell Climate Research Center ("Woodwell") is a scientific research organization that works with a worldwide network of partners to understand and combat climate change. Woodwell scientists work in more than 20 countries on six continents, collaborating with a wide range of partners, including national, subnational and local governments. That work includes the development of strategies to promote natural climate solutions for reducing carbon in the atmosphere.

Voluntary carbon markets present a remarkable opportunity to direct unprecedented financial resources to conservation and natural climate solution projects. These markets, however, have taken a reputational hit over the past year as a result of negative media coverage focused on projects that do not deliver envisioned emissions reductions benefits. Carbon credit programs are in need of quality standards and transparency that can give confidence to both producers and buyers.

Woodwell applauds the Commission for this effort to provide guidance that will strengthen voluntary carbon markets. The Commission correctly focuses on standards for transparency, additionality, permanence and risk of reversal, and robust quantification as the critical underpinnings of an effective and well-functioning voluntary carbon market. Indeed, it is transparency about additionality, permanence, and quantification that will boost confidence from potential buyers of carbon credits. Similarly, information about sustainable development benefits and social safeguards should be made readily accessible.

Woodwell also believes that this guidance should be seen as a necessary first step on the path toward regulations that codify effective standards.

Sincerely,

A handwritten signature in black ink, appearing to read "David McGlinchey", with a long horizontal line extending to the right.

David McGlinchey

*Chief of Government Relations  
Woodwell Climate Research Center*