

Galicia establishes its own voluntary carbon credit system

On October 29, the Official Gazette of Galicia published <u>Decree 95/2025</u>, of September 15, regulating the Xunta de Galicia's voluntary carbon credit system.

Spain | Legal Flash | December 2025

KEY ASPECTS

- Decree 95/2025 establishes a specific, rigorous, and transparent regulatory framework for its voluntary carbon credit market, setting out clear procedures for certification, verification, and registration.
- It marks a significant step forward in driving climate action in Galicia.
- The new voluntary carbon credit market was implemented on November 18, 2025.
- The new regulation applies to public and private organizations seeking to offset their carbon footprint by participating in projects that contribute to carbon removal or sequestration.





Introduction

The voluntary carbon credit system launched by the Xunta de Galicia (Regional Government of Galicia) provides a structured framework for connecting project developers—who create initiatives to absorb, reduce, or prevent greenhouse gas emissions, generating "carbon credits"—with individuals and organizations, both public and private, including small and medium-sized enterprises. These participants can acquire these credits to claim the benefits of the projects generating them and thereby offset their own emissions.

To this end, Decree 95/2025, of September 15, regulating the voluntary carbon credit system in Galicia, entered into force on November 18, 2025.

The regulation has two main objectives. First, it sets out the structure and organization of the Xunta de Galicia's voluntary carbon credit system, defining the rights and responsibilities of all participants—both those offering and those acquiring credits. Second, it establishes the requirements for third-party verification and certification of actions aimed at preventing or sequestering carbon, as well as the procedures for managing certification systems and maintaining official records.

The decree is organized into seven chapters and twenty-three articles, supplemented by two additional provisions, two final provisions, and an annex that details the types of activities covered by the carbon credit methodologies.

Objectives of the system

The voluntary carbon credit system established by the Xunta de Galicia aims to:

- help achieve climate neutrality and the decarbonization of Galicia's economy;
- > support the conservation of the environment, natural areas, and rural landscapes;
- encourage an economic model that values natural capital, bringing benefits such as greater biodiversity, wildfire prevention, protection against natural disasters, and the creation of local employment;
- promote the sustainable management of natural, agricultural, forestry, and marine resources; and
- encourage public and private organizations to take part in initiatives that deliver environmental, social, and economic benefits.

Fundamental principles

The voluntary carbon credit system established by the Xunta de Galicia is built on the following principles:

- Voluntariness: participation is open and voluntary for those offering and those seeking carbon credits.
- > Transparency: clear, accessible, and public information is provided about mitigation activities and projects.
- > Single accounting: each credit is counted only once, ensuring there is no double certification or use.
- > Permanence: measures are in place to ensure the long-term durability of captured carbon, along with safeguards against possible reversals.
- > Governance: effective and transparent collaboration among all system participants.
- Independence: certification and verification are carried out by independent, accredited organizations.
- Sustainable development: priority is given to positive social, environmental, and economic impacts.



Methodologies and eligible projects

Certification methodologies must be based on the guidelines of the Intergovernmental Panel on Climate Change (IPCC), on best practices used for developing the National Greenhouse Gas Inventory, and on the most robust scientific evidence available. Methodologies may be proposed either directly by the Technical Committee of the Voluntary Carbon Credit System—a collegiate advisory body attached to the department responsible for climate change—or by interested parties through the Xunta de Galicia's online portal.

Eligible projects include the following:

- Agriculture and forestry: afforestation or initial reforestation, degraded land restoration, sustainable forest management, agroforestry systems, regenerative agriculture, improvements in livestock management, and the use of residual biomass from forest harvesting, among others.
- **Energy industry transition and efficiency**: biomass, solar, geothermal, aerothermal, biochar, biogas, green hydrogen, and green methanol.
- **Construction and buildings**: use of wood and carbonated materials in construction.
- **Reducing emissions from deforestation and degradation**: wildfire prevention, forest hydrological restoration, and integrated pest management.
- **Other sectors**: urban tree planting, waste management, direct air carbon capture, bioenergy with carbon capture and storage, aquaculture for biofixation, efficient water management, and more.

Certification and verification

Initial certification (ex ante validation) and periodic verifications (ex post verification) of projects must be carried out by independent certification bodies accredited by a national accreditation authority in accordance with Regulation (EC) No 765/2008. These bodies must not have any legal or financial ties to the project operators, ensuring impartiality and technical rigor.

Initial certification confirms that the project meets the requirements of the voluntary carbon credit system and the specific methodology it follows. This process reviews, among other aspects, the project's additionality, credit quantification, the baseline setting, duration, and associated risks. Periodic verifications ensure that project activities are properly implemented and that the amount of carbon captured is accurately quantified.

Galicia's carbon credit platform

Galicia's Carbon Credit Platform acts as the central hub for managing and transacting carbon credits, and fulfills the following functions, among others:

- Publishing model project templates and supporting documents for interested parties, covering project content, carbon calculation, and submission guidelines.
- Registering and making public the projects enrolled in the platform, the credits generated and transacted, and the certification bodies involved.
- > Ensuring the traceability of all transactions carried out.
- Allowing public consultation and managing complaints and claims.
- > Facilitating interoperability with other regional, national, or international registries. To prevent double counting, projects registered on the Galicia Carbon Credit Platform cannot be registered in other similar national or international market systems.



The platform must be made available within nine months from the day after Decree 95/2025 entered into force.

Promotion measures

The Xunta de Galicia may introduce incentives and support mechanisms to encourage the development and registration of carbon projects, especially those providing additional environmental and social benefits. Carbon credits associated with this voluntary market may also receive preferential treatment in calls for public grants and subsidies.

Conclusion

Decree 95/2025 represents a significant step forward for climate action and corporate sustainability in Galicia. It provides legal certainty, transparency, and strategic opportunities for organizations committed to decarbonization and the creation of environmental and social value. It is advisable for these organizations to carefully review the new regulatory framework and plan their adaptation accordingly.



For additional information, please contact our <u>Knowledge</u> and <u>Innovation Group</u> lawyers or your regular contact person at Cuatrecasas.

©2025 CUATRECASAS

All rights reserved.

This document is a compilation of legal information prepared by Cuatrecasas. The information or comments included in this document do not constitute legal advice.

The intellectual property rights in this document are owned by Cuatrecasas. Reproduction in any medium, distribution, transfer, and any other use of this document, whether in its entirety or in excerpted form, are prohibited without Cuatrecasa's prior authorization.

