International Civil Aviation Organization (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

Application Form for Emissions Unit Programmes seeking eligibility to supply units to the CORSIA first phase (2024 – 2026 compliance period)

(Version 6, January 2024)

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SECTION I: ABOUT THIS ASSESSMENT

Background

ICAO Member States and the aviation industry are implementing the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). Together with other mitigation measures, CORSIA will help achieve international aviation's aspirational goal of carbon neutral growth from the year 2020. Aeroplane operators will meet their offsetting requirements under CORSIA by purchasing and cancelling CORSIA eligible emissions units. The ICAO Council determines CORSIA eligible emissions units upon recommendations by its Technical Advisory Body (TAB) and consistent with the CORSIA Emissions Unit Eligibility Criteria (EUC).

In March 2019, the ICAO Council unanimously approved the ICAO Document *CORSIA Emissions Unit Eligibility Criteria* for use by TAB in undertaking its tasks[1]. TAB's assessment of emissions units programmes is undertaken annually[2]. ICAO Council decisions that take account of these recommendations are contained in the ICAO Document *CORSIA Eligible Emissions Units*[3].

ICAO invites emissions unit programmes[4] interested to apply for the 2024 cycle of assessment by the TAB, to determine eligibility to supply CORSIA-Eligible Emissions Unit for the 2024-2026 compliance period (first phase). The assessment process will involve collecting information from each programme through this programme application form and supplementary materials and requested evidence.

Through this assessment, the TAB will develop recommendations on the list of eligible emissions unit programmes (and potentially project types) for use under the CORSIA first phase, which will then be considered by the ICAO Council.

This form is accompanied by, and refers to, Appendix A "*Supplementary Information for Assessment of Emissions Unit Programmes*", containing the EUC and *Guidelines for Criteria Interpretation*. These EUC and Guidelines are provided to inform programmes' completion of this application form, in which they are cross-referenced **by**

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[1] Available on the ICAO CORSIA website:
https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-Emissions-Units.aspx
[2] Recommendations from 2019 TAB assessment cycle:
https://www.icao.int/environmental-protection/CORSIA/Pages/TAB2019.aspx
Recommendations from 2020 TAB assessment cycle:
https://www.icao.int/environmental-protection/CORSIA/Pages/TAB2020.aspx
Recommendations from 2021 assessment cycle:
https://www.icao.int/environmental-protection/CORSIA/Pages/TAB2021.aspx
Recommendations from 2022 assessment cycle:
https://www.icao.int/environmental-protection/CORSIA/Pages/TAB2022.aspx
Recommendations from 2023 assessment cycle: https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx
[3] Available on the ICAO CORSIA website:
https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-Emissions-Units.aspx
[4] "Emissions Unit Programme", for the purposes of TAB's assessment, refers to an organization that administers standards and procedures for developing activities that generate offsets, and for verifying and "issuing" offsets created by those activities. For more information, please review the TAB FAQs on the ICAO CORSIA website:
https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx

paragraph number.[5]

This form is also accompanied by Appendix B "*Programme Assessment Scope*", and Appendix C "*Programme Exclusions Scope*", which request all applicants to identify the programme elements[6] they wish to submit for, or exclude from, TAB's assessment.

CORSIA Eligible Emissions Units Programmes must also complete Appendix D of this application, "*Emissions Unit Programme Registry Attestation*" in line with the instructions contained in Appendix D. Applicant organizations are strongly encouraged to submit this information by the deadline for submitting all other application materials for the current assessment cycle.

This form also requests *evidence of programme procedures or programme elements*. These evidentiary documents enable TAB to a) confirm that a given procedure or program element is *in place*, b) more fully comprehend the programme's summary responses, and c) archive the information as a reference for potential future assessments. Programme responses to this application form will serve as the primary basis for the assessment. Such assessment may involve e.g. clarification questions, live interview(s) with TAB, and a completeness check of the application, as further requested.

Translation: The working language of the assessment process is English. Translation services are not available for this process. If the programme documents and information are not published in English, the programme should fully describe in English (*rather than summarize*) this information in the fields provided in this form, and in response to any additional questions. Where this form requests *evidence of programme procedures*, programmes are strongly encouraged to provide these documents in English, to provide for accuracy and comprehension. Where this is not possible due to time constraints or document length, the programme may provide such documents in their original language in a readily translatable format (e.g., Microsoft Word). Those programmes that need to translate documents prior to submission may contact the ICAO Secretariat regarding accommodation.

Disclaimer: The information contained in the application, and any supporting evidence or clarification provided by the applicant including information designated as "business confidential" by the applicant, will be provided to the members of the TAB to properly assess the programme and make recommendations to the ICAO Council. The application and such other evidence or clarification will be made publicly available on the ICAO CORSIA website for the public to provide comments, except for information which the applicant designates as "business confidential". Public comments received during that period, including commenter names and organizations, are published following the decision by the Council in respect of TAB's eligibility recommendations for this cycle. All comments are published as received and Programme responses to public comments are not published on the ICAO website. The applicant shall bear all expenses related to the collection of information for the preparation of the application, preparation and submission of the application to the ICAO Secretariat and provision of any subsequent clarification sought by the Secretariat and/or the members of the TAB. Under no circumstances shall ICAO be responsible for the reimbursement of such or any other expenses borne by the applicant in this regard, or

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[5] For further information on how TAB interprets the EUC in light of the *Guidelines*, refer to the document Clarifications of TAB's Criteria Interpretations Contained in TAB Reports available on the ICAO TAB website:
https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/ClarificationsofTABsCriteriaInterpretations.pdf
[6] At the "activity type" level (e.g., sector(s), sub-sector(s), and/or project "type(s)")

any loss or damages that the applicant may incur in relation to the assessment and outcome of this process.

SECTION II: INSTRUCTIONS

Submission and contacts

A programme is invited to complete and submit the form, including accompanying evidence and with required appendices, through the ICAO CORSIA website no later than close of business on **04 March 2024** Within seven business days of receiving this form, the Secretariat will notify the programme that its form was received.

If the programme has questions regarding the completion of this form, please contact ICAO Secretariat via email: TAB@icao.int. Programmes will be informed, in a timely manner, of clarifications provided by ICAO to any other programme.

Form basis and cross-references

Questions in this form are derived from the CORSIA emissions unit eligibility criteria (EUC) and any *Guidelines for Criteria Interpretation* introduced in Section I (above). To help inform the programme's completion of this form, each question includes the paragraph number for its corresponding criterion or guideline that can be found in **Appendix A** "*Supplementary Information for Assessment of Emissions Unit Programmes*".

Application Form completion

The programme is expected to respond to all questions in this application form at the time of application submission. TAB cannot initiate its assessment of applications in which this information is not provided in full as requested in this section. Failure to provide complete information may result in delays to the application's assessment.

A "complete" response involves three components: 1) a written summary response; 2) supporting evidence; and 3) programme revisions, where an applicant is considering or undertaking revisions to a programme procedure in question.

1) <u>Written summary responses</u>: The programme is encouraged to construct written summary responses in a manner that provides for general comprehension of the given programme procedure, independent of supporting evidence. TAB will confirm each response in the supplementary evidence provided by the programme. Please note that written summary responses should be provided in all cases—supporting evidence (described in *c)* below) should not be considered as an alternative to a complete summary response.

2) <u>Supporting evidence</u>: Most questions in this form request *evidence of programme procedures or programme elements.* Such evidence may be found in programme standards, requirements, or guidance documents; templates; programme website or registry contents; or in some cases, in specific methodologies. To help manage file size, the programme should limit supporting documentation to that which directly substantiates the programme's statements in this form.

Regarding such requests for evidence, programmes are expected to substantiate their responses in any of these ways (**in order of preference**):

a) web links to supporting documentation included along with the written summary response to each given question; with instructions for finding the relevant information within the linked source (i.e. identifying the specific text, paragraph(s), or section(s) where TAB can find evidence of the programme procedure(s) in question);

b) copying/pasting information directly into this form (no character limits) along with the written summary response;

c) attaching supporting documentation to this form at the time of submission, with instructions for finding the relevant information within the attached document(s);

EXAMPLE of preferred approach to providing supporting evidence that could meet expectations for complete responses to a question:

"The Programme ensures its consistency with this requirement by requiring / undertaking / etc. the following:

[Paragraph(s) introducing and summarizing specific programme procedures relevant to question, including quotes/excerpts of the relevant provisions in the programme's procedures]

The full contents of these procedures can be found in [Document title, page X, Section X, paragraphs X-X]. This document is publicly available at this weblink: [weblink]."

3) <u>Programme revisions</u>: Where the programme has any plans to revise the programme (e.g., its policies, procedures, measures, tracking systems, governance or legal arrangements), including to enhance consistency with a given criterion or guideline, please provide the following information in response to any and all relevant form question(s):

a) Proposed revision(s);
b) Process and proposed timeline to develop and implement the proposed revision(s);
c) Process and timeline for external communication and implementation of the revision(s).

Application and assessment scope

The programme may elect to submit for TAB assessment all, *or only a subset,* of the activities supported by the programme. The programme is requested to identify, in the following Appendices, the activities that it wishes to submit for, or exclude from, TAB's assessment:

In **Appendix B** "*Programme Assessment Scope*", the programme should clearly identify, at the "activity type" level (e.g., sector(s), sub-sector(s), and/or programme/project "type(s)"), elements that the programme *is* **submitting for TAB's assessment** of CORSIA eligibility; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements; which *are* described in this form.

In **Appendix C** "*Programme Exclusions Scope*", the programme should clearly identify, at the "activity type" level (e.g., sector(s), sub-sector(s), and/or programme/project "type(s)"), any elements the programme **is not submitting for TAB's assessment** of CORSIA eligibility, which *are not* described in this form; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements.

Emissions Unit Programme Registry Attestation

In **Appendix D** "*Emissions Unit Programme Registry Attestation (version 2, January 2022)*", the programme should provide the information relating to programme registry functionality that is referred to in the attestation and its attachment. Both the programme representative of an emissions unit programme, and the administrator or authorized representative of the registry designated by the programme, should review and attest to the accuracy of this information and their acceptance of the terms, preferably at the time of application.

Treatment of EUC-relevant programme procedures at the methodology level

Programmes that identify with the following explanations are encouraged to summarize and provide evidence of both their overarching *programme-level* procedure(s) and *methodology-level* procedure(s) wherever relevant:

The CORSIA EUC and TAB assessments typically apply to *programme-level* procedures rather than to individual methodologies or projects. Most programmes' overarching guidance documents contain a mix of *general/guiding* requirements and *technical* ones. However, some programmes set out general requirements in overarching guidance documents, while reflecting key technical procedures in programme methodologies[7]. **Such methodologies may be relevant to TAB's assessment**. This could be the case where, e.g., the methodologies are developed directly by the programme (staff or contractors); the programme must refer to a methodology's requirements when describing its alignment with the EUC; the programme's general requirements alone are too high-level/non-specific for TAB to assess them as stand-alone procedures.

> **EXAMPLE**: Programme A's project standard contains its *programme-level* general requirements. The standard requires all activities to pass a programme-approved additionality test. However, Programme A sets out a unique list of approved tests in each of its methodologies—rather than providing a single list or menu in its programme-level standard. These lists vary across different activity types or category(ies). Thus, TAB may ultimately need to assess Programme A's programme- *and* methodology-level requirements in order to confirm its use of the specific additionality tests called for under the *Must be Additional* criterion.

"Linked" certification schemes

This application form should be completed and submitted exclusively on behalf of the programme that is described in Part I of this form.

Some programmes may supplement their standards by collaborating with other schemes that certify, e.g., the

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[7] Note that any applicant may use different terminology. For example, a programme may refer to a "methodology" as a protocol or framework.

social or ecological "co-benefits" of mitigation. The programme can reflect a linked scheme's procedures in responses to this form, where this is seen as enhancing—i.e. going "above and beyond"—the programme's own procedures. For example, the programme may describe how a linked scheme audits sustainable development outcomes; but is not expected to report the linked scheme's board members or staff persons. Programmes should clearly identify any information provided in this form that pertains to a linked certification scheme and/or only applies when a linked certification scheme is used.

Disclosure of programme application forms and public comments

Applications, including information submitted in Appendices B, C, and D, as well as other information submitted by applicants will be publicly available on the ICAO CORSIA website, except for materials which the applicants designate as business confidential. The public will be invited to submit comments on the information submitted, including regarding consistency with the EUC, through the ICAO CORSIA website, for consideration by the TAB in its assessment. All comments are published as received and Programme responses to public comments are not published on the ICAO website.

SECTION III: APPLICATION FORM

PART 1: General information

A. Programme Information

Programme name: Ecosystem Restoration Standard (ERS)

Administering Organization[8]: Ecosystem Restoration Standard (ERS)

Official mailing address: 25 rue Frémicourt, 75015, Paris

Telephone #: +33 7 68 86 29 89

Official web address: www.ers.org

B. Programme Administrator Information

Full name and title: Ms. Priscille Raynaud, Managing Director

Employer / Company (*if not programme*):

E-mail address: p.raynaud@ers.org   Telephone #: +33 7 68 86 29 89

C. Programme Representative Information (if different from Programme Administrator)

Full name and title: Click or tap here to enter text.

Employer / Company (*if not Programme*): Click or tap here to enter text.

E-mail address: Click or tap here to enter text.   Telephone #: Click or tap here to enter text.

D. Programme Senior Staff / Leadership (e.g., President / CEO, board members)

List the names and titles of programme's senior staff / leadership, including board members:

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[8] Name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme, *if different from "Programme Name"*.
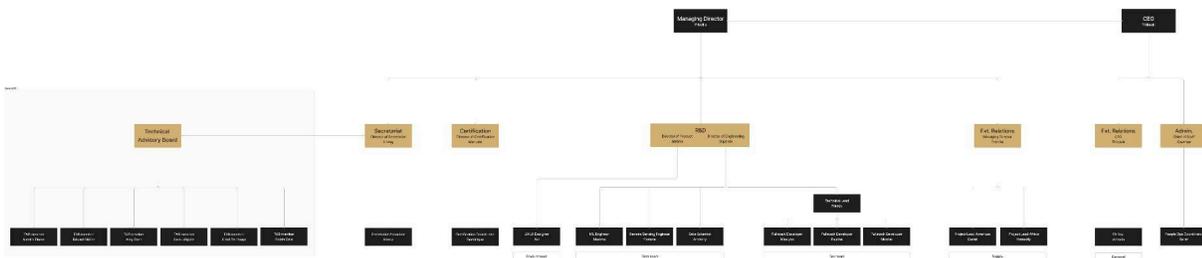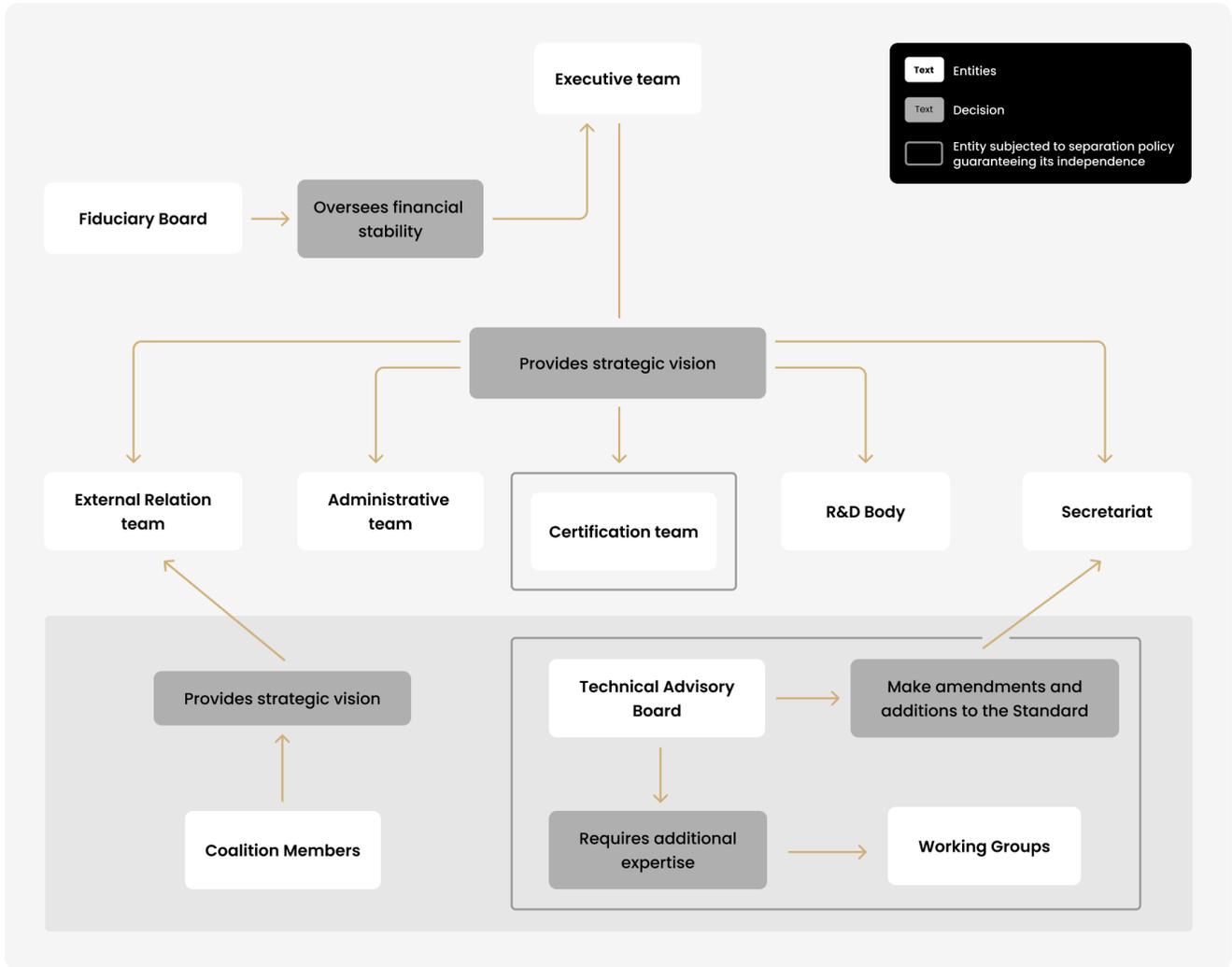
ERS leadership team includes:
- Mr. Thibault Sorret, CEO
- Ms. Priscille Raynaud, Managing Director
- Ms. Manuela Yamada, Director of Certification
- Mr. Baptiste Morel-lab, Director of Engineering
- Mr. Jérôme Cance, Director of Product

ERS Technical Advisory Board includes:
- Ms. Nathalie Flores
- Mr. Eduard Muller, PhD
- Ms. Amy Bann
- Ms. Sara Löfqvist, PhD
- Mr. Fidel Chiriboga, PhD
- Mr. Robin Cole, PhD

Provide an organization chart (in the space below or as an attachment) that illustrates, or otherwise describes, the functional relationship a) between the individuals listed in D; and b) between those individuals and programme staff / employees; and c) the functions of each organizational unit and interlinkages with other units.

This chart is accessible via the following link:
https://www.figma.com/file/HwLtAQyah0VS0xdiiFK0hd/ERS-Org-Chart?type=whiteboard&node-id=0%3A1&t=PiieUf7GteZSMcBL-1

PART 2: Programme summary

Provide a summary description of your programme

Our planet is grappling with over two billion hectares of degraded land, a call to action that cannot go unanswered. Carbon markets have laid the groundwork for financing crucial environmental efforts, yet the potential to leverage market-based solutions to drive restoration on a global scale remains untapped. To date, reforestation projects represent a mere 3% of issued carbon credits, most of them stemming from commercial plantations of non-native species. Restoration projects are vastly under-certified and underfunded.

In light of this reality, the Ecosystem Restoration Standard (ERS) established a carbon crediting programme to empower people and organisations to restore the natural world. Founded in 2020, our organisation is headquartered in Paris, France and employs 20+ full-time staff globally.

ERS' flagship methodology, M001, covers terrestrial forest restoration projects. Each project is assessed on three core pillars (Ecological Recovery, Carbon and Livelihoods) and audited by accredited verification and validation bodies (VVBs). In addition, ERS has heavily invested in the use of digital Measurement, Verification and Reporting (dMRV) to strengthen the programme's safeguards. With support from the European Space Agency (ESA) and the Centre National des Études Spatiales (CNES), ERS has developed an approach to certification that integrates the use of satellite data to measure carbon stocks and monitor projects.

Our programme is the culmination of over 3 years of ongoing development and refinements. In line with market best practice, it went through a thorough public consultation which garnered broad market input (500+ participants, 60+ responses). The ERS Secretariat put meticulous attention towards aligning the latest version of our standard to CORSIA Phase 1 requirements and believes that the programme is sufficiently mature to meet the ICAO's requirements.

We appreciate your consideration of our application and remain at your disposal to answer any questions you may have.

PART 3: Emissions Unit Programme Design Elements

Note—where "evidence" is requested throughout *Part 3* and *Part 4*, the programme is expected to provide web links to documentation and to identify the specific text, paragraph(s), or section(s) where TAB can find evidence of the programme procedure(s) in question. If that is not possible, then the programme may provide evidence of programme procedures directly in the text boxes provided (by copying/pasting the relevant provisions) and/or by attached supporting documentation, as recommended in "SECTION II: INSTRUCTIONS—*Form Completion: Supporting Evidence*".

Note—"*Paragraph X.X*" in this form refers to corresponding paragraph(s) in <u>Appendix A</u> "*<u>Supplementary Information for Assessment of Emissions Unit Programmes</u>*".

Note—Where the programme has any plans to revise the programme (e.g., its policies, procedures, measures, tracking systems, governance or legal arrangements), including to enhance consistency with a given criterion or guideline, provide the following information in response to any and all relevant form question(s):

- − Proposed revision(s);
- − Process and proposed timeline to develop and implement the proposed revision(s);
- − Process and timeline for external communication and implementation of the revision(s).

Question 3.1. Clear methodologies and protocols, and their development process

Provide *evidence*[9] that the programme's qualification and quantification methodologies and protocols are *in place* and *available for use*, including where the programme's existing methodologies and protocols are publicly disclosed: (*Paragraph 2.1*)

The ERS Programme developed its own carbon quantification methodology and field protocols to assess baselines and verify Project activities. The carbon quantification methodology and the field protocols are in place and can be used by Project Developers (designated as Developers in this Form) undergoing ERS certification via the ERS apps.

All methodology documents, including templates and guidelines, are publicly available on ERS' website, accessible at this weblink: https://www.ers.org/documentation. More specifically, the carbon quantification methodology developed and applied by ERS is accessible at this weblink:
https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf.
For a more user-friendly application, the field protocols have been implemented on a mobile app that can be downloaded on any mobile device, and is available on both IOS and Google Play.

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[9] For this and subsequent "evidence" requests, evidence should be provided in the text box (e.g., web links to documentation), and/or in attachments, as recommended in "SECTION II: INSTRUCTIONS—*Form Completion*".

Summarize the programme's process for developing further methodologies and protocols, including the timing and process for revision of existing methodologies: (*Paragraph 2.1*)
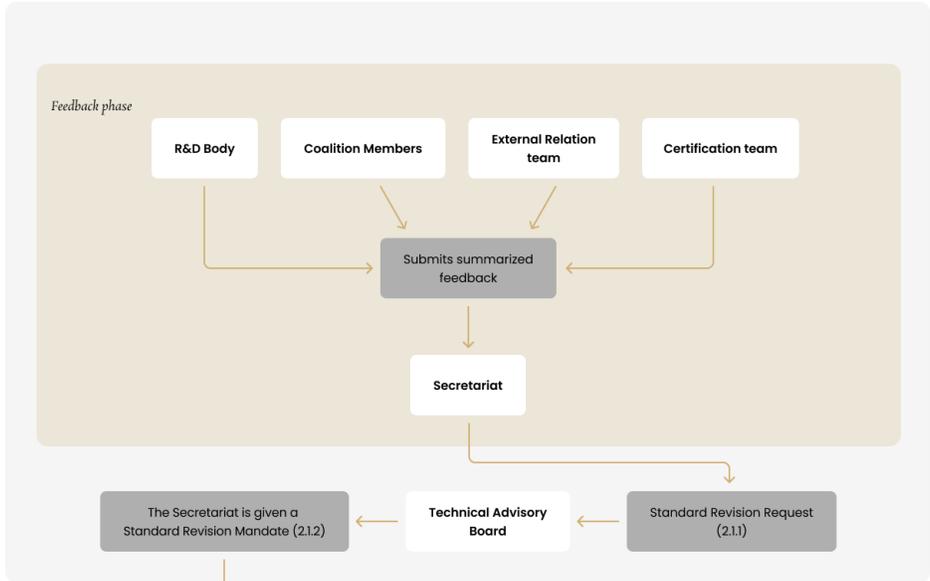
The ERS Programme follows a precise process for developing and revising methodologies: the Standard Revision Procedure. This procedure applies equally to the creation of new methodologies and the revision of existing ones. Key stages in this process include:

- Submission Phase: This phase involves initiating revisions through Standard Revision Requests, Standard Revision Mandates, or Direct Revisions. The TAB must answer Standard Revision Requests within 30 consecutive days. If not, they shall be considered as rejected.
- Review Phase: During this phase, the Secretariat prepares a detailed Standard Revision Proposition. The Technical Advisory Board (TAB) plays a critical role in reviewing these propositions. They can either accept, request further modifications, or outright reject the proposed revisions.
- Public Comment Period: For major revisions, a public comment period is mandated by the TAB. This period lasts for a minimum of 30 days, allowing stakeholders to review and provide feedback. Following this, the Secretariat compiles a consultation digest that summarises and responds to the feedback, ensuring that stakeholder input is considered.
- Approval Phase: The final step involves the TAB reviewing the Final Standard Revision. Based on this review, they can either accept the revision or request additional modifications. Once approved, public disclosure of the final revision is required, emphasising transparency and accountability.
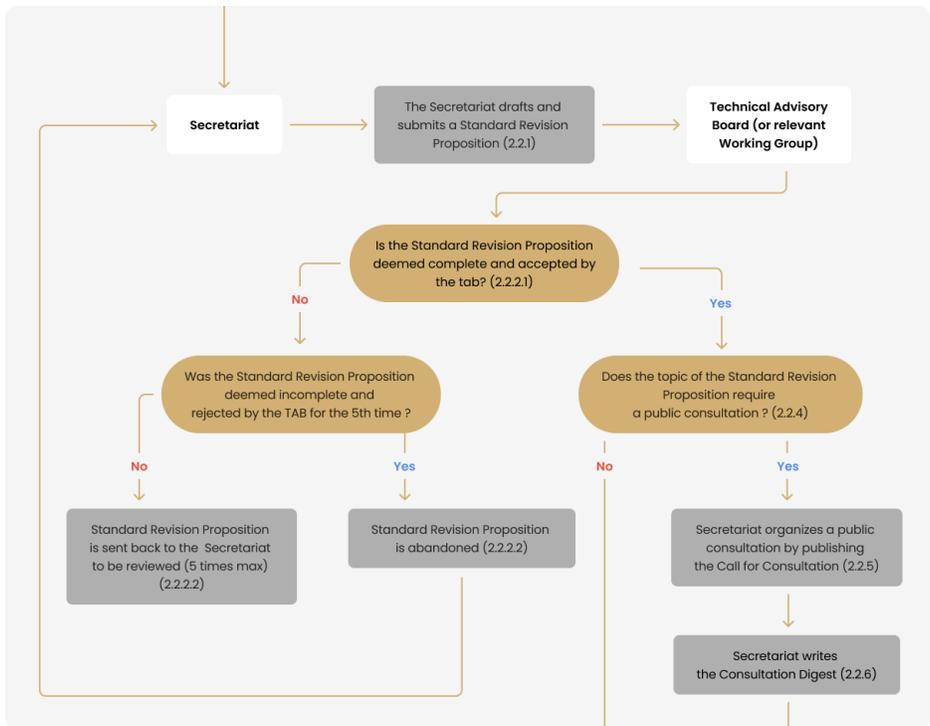
At least every two years, existing methodologies are reviewed by the TAB to ensure ongoing accuracy and effectiveness, particularly in relation to GHG emission reductions or removals. Methodologies found to overestimate these reductions or removals are subject to suspension and withdrawal.

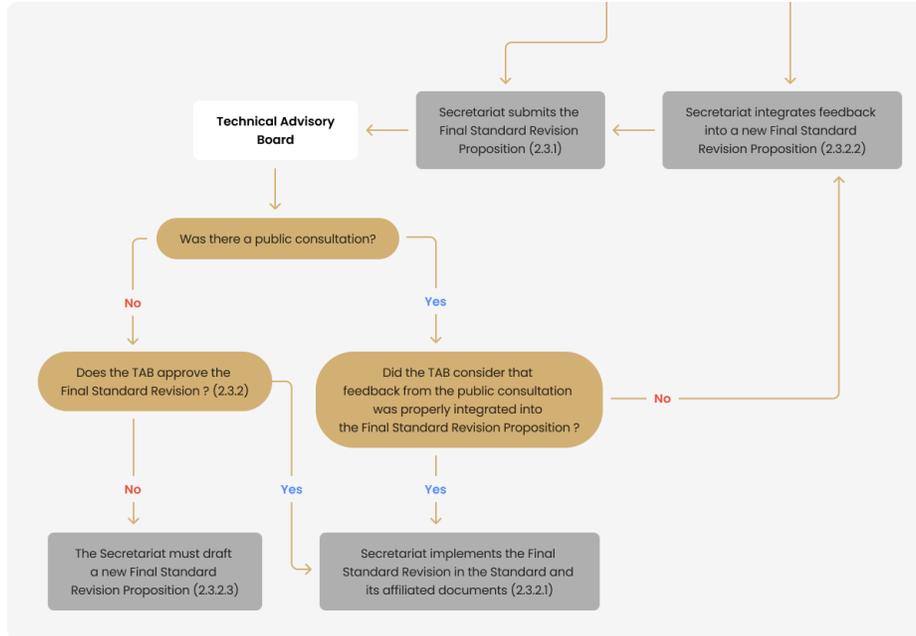Please find below infographics illustrating the Standard Revision Procedure:

1. Submission Phase

Feedback phase

R&D Body	Coalition Members	External Relation team	Certification team

Submits summarized feedback

Secretariat

The Secretariat is given a Standard Revision Mandate (2.1.2)	←	Technical Advisory Board	←	Standard Revision Request (2.1.1)

2. Review Phase

Secretariat → The Secretariat drafts and submits a Standard Revision Proposition (2.2.1) → Technical Advisory Board (or relevant Working Group)

Is the Standard Revision Proposition deemed complete and accepted by the tab? (2.2.2.1)

No →

Was the Standard Revision Proposition deemed incomplete and rejected by the TAB for the 5th time ?

No / **Yes**

Standard Revision Proposition is sent back to the Secretariat to be reviewed (5 times max) (2.2.2.2)

Standard Revision Proposition is abandoned (2.2.2.2)

Yes →

Does the topic of the Standard Revision Proposition require a public consultation ? (2.2.4)

No / **Yes**

Secretariat organizes a public consultation by publishing the Call for Consultation (2.2.5)

Secretariat writes the Consultation Digest (2.2.6)

3. Approval Phase

The full contents of these procedures can be found in the:

- Standard Revision Procedure, pages 4-12, "Revision Procedure" and "Appendix 1" This document is publicly available at this weblink: https://docs.ers.org/standard1.0/standard-revision-procedure.pdf.
- ERS Governance, pages 7-10, "Secretariat". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/ers-governance.pdf
- Technical Advisory Board, page 3, "Role". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/technical-advisory-board.pdf
- ERS Public Consultation Digest. This document is publicly available at this weblink: https://www.ers.org/blog/feedback-digest-consultation-ecosystem-sestoration-standard

The submission phase of the Standard Revision Procedure is subject to revisions in the next version of the ERS Programme.

- Proposed Revision: The Secretariat will be able to send Revision Propositions directly, without addressing a Revision Request to the TAB. This will allow to speed up the implementation process for revisions, especially when the ERS Secretariat is receiving important feedback from ERS entities and external stakeholders.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Provide *evidence of the public availability* of the programme's process for developing further methodologies and protocols: (*Paragraph 2.1*)

The ERS Programme's methodology development and revision processes are publicly documented, showcasing the programme's commitment to transparency and stakeholder engagement. These processes are detailed across three key documents, each addressing different aspects of the programme's governance and standard revision procedures:

- ERS Governance: This document outlines the overall governance structure of the ERS Programme, providing a context for how methodologies are developed and revised within the framework of the programme's governance.
- Standard Revision Procedure: This document provides an in-depth look at the procedure for revising standards and methodologies, including phases like submission, review, public comment, and final approval.
- Technical Advisory Board (TAB): It details the role and responsibilities of the TAB in the methodology development process, emphasising the TAB's contribution to maintaining scientific rigour and objectivity.

The full contents of these procedures can be found in the:

- ERS Governance, pages 7-10, "Secretariat". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/ers-governance.pdf
- Standard Revision Procedure, pages 4-12, "Revision Procedure" and "Appendix 1". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/standard-revision-procedure.pdf
- Technical Advisory Board, page 3, "Role". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/technical-advisory-board.pdf

Question 3.2. Scope considerations

Summarize the level at which activities are allowed under the programme (e.g., project based, programme of activities, jurisdiction-scale): (*Paragraph 2.2*)

As of today, the ERS Programme allows only for terrestrial forest restoration activities implemented at the project level, as detailed in the M001 methodology.

The M001 methodology document is publicly available at this weblink:

https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf.

Summarize the eligibility criteria for each type of offset activity (e.g., which sectors, project types, and geographic locations are covered): (*Paragraph 2.2*)

As of today, the ERS Programme certifies terrestrial forest restoration activities only. The M001 methodology defines the eligibility criteria as follows:

- Project Location: The Project must be situated in inland forest landscapes between latitudes 51.6° N and

51.6° S and located in 'Tropical-subtropical forests' (T1) or 'Temperate-boreal forests' (T2) biomes following the IUCN classification.

- Project Size: No minimum or maximum land area or GHG sequestration capacity is required.
- Project Design: The Project must be designed to restore previously degraded terrestrial forests and their ecosystem services, benefit biodiversity at the local and landscape levels, and foster sustainable livelihoods.
- Project activities must be demonstrated to be additional and must have started a maximum of 18 months before submission to the ERS Programme.

The full content of the eligibility criteria can be found in the M001 - Methodology for Terrestrial Forest Restoration, section "Eligibility Criteria", pages 6-11, publicly available at this weblink:
https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf.

The Eligibility Criteria are subject to revision in the next version of the M001 methodology:
- Section restructuring
  - Proposed revision: The "Eligibility Criteria" will be sub-divided into two sections: eligibility criteria and Project design requirements
  - Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
  - Timeline: this revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.
- Project Location
  - Proposed revision: The ERS Programme will do a revision to include trophic savannas (T4.1) and temperate woodlands (T4.4) ecosystems to expand the ecosystem typology and the range of project locations eligible for certification under the M001 methodology.
  - Process: The accuracy of carbon calculations on such new ecosystem types is currently being tested by the ERS R&D team. This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
  - Timeline: If such tests are positive, and upon review by the Technical Advisory Board, the ERS Secretariat will add it to an updated version of the M001 methodology, scheduled for release by the second quarter of 2024.

Provide *evidence* of the Programme information defining a) level at which activities are allowed under the Programme, and b) the eligibility criteria for each type of offset activity, including its availability to the public: (*Paragraph 2.2*)

As of today, the ERS Programme certifies terrestrial forest restoration activities only and the eligibility criteria for such type of offset activity are detailed in section "Eligibility Criteria", pages 6-11, publicly accessible via this weblink: https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

Question 3.3. <u>Offset credit issuance and retirement procedures</u>

Are procedures in place defining how offset credits are… (*Paragraph 2.3*)	
a) issued?	☑ YES
b) retired / cancelled?	☑ YES
c) subject to discounting (*if any*)?	☑ YES

Are procedures in place defining… (*Paragraph 2.3*)	
d) the length of crediting period(s)?	☑ YES
e) whether crediting periods are renewable?	☑ YES

Provide evidence of the procedures referred to in a) through e) (if any, in the case of "c"), including their availability to the public:

a) Credit issuances

The ERS Programme issues two types of units:

- Projected Restoration Units (PRUs), which represent a tCO2e that is expected to be sequestered during the Project's crediting period. PRUs are not considered carbon credits but can be sold, traded and used as collateral. The total amount of PRUs is issued at Project start, once the Project has been successfully validated by an accredited Validation/Verification Body (VVB). Of the total issued PRUs, 20% rounded up are transferred to the Buffer Pool, and 80% rounded down are transferred to the Developer's account in the Registry.
- Verified Restoration Units (VRUs), which represent a verified removal of 1tCO2e from the atmosphere. VRUs result from the conversion of PRUs and are categorised into vintages according to the year when the removal occurred. Conversion happens sequentially, based on the unique serial number of a unit, every two years starting year four, following the successful Verification of an accredited VVB. VRUs are considered carbon credits and can be retired.

It is important to note that only VRUs will be ICAO-eligible units. PRUs will be added as an exclusion in Appendix C.

Details regarding this issuance mechanism can be found in the ERS Programme document, section "Units & Issuances", pages 40-42. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/programme.pdf
Details regarding the carbon calculations leading to the issuances can be found in the Quantification Methodology for Terrestrial Forests, publicly available at this weblink:
https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

b) Credit retirement and cancellation

The retirement of Verified Restoration Units follows specific rules:

- Only VRUs can be retired.

- VRUs must be retired on behalf of incorporated entities or individuals.
- The reason for retirement must be disclosed. The ERS Programme allows retirement for the following reasons: compensation or contribution claims.
- All retirements are documented and recorded within the ERS Registry.

Details regarding the retirement of Restoration Units can be found in the Registry Procedures document, section "Retirement", pages 19-20. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf

Cancellation of Restoration Units can happen in the following circumstances:
- A reversal event. Such an event must be identified, qualified as avoidable or unavoidable, measured and verified by a VVB before cancellation can occur. The full content of the procedure can be found in the Registry Procedure, section "Reversal Events", pages 16-17. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf.
- A double counting event, in the context of Article 6 transfers. Following the identification and quantification of a double-counting event, the Secretariat must cancel the double-counted units, and the Developer must compensate them. The full content of the procedure can be found in Registry Procedure, section "Double Counting", pages 17-18. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf.
- Project failure. If a Project is considered as failed, the remaining PRUs (that have not yet been converted into VRUs) must be cancelled by the Secretariat, and the issued VRUs must be retired by their owners within twelve months. All VRUs not retired within this twelve-month period will be automatically cancelled in the Registry. Details regarding the cancellation procedure following a Project failure can be found in the ERS Programme document, section "Project Failure", pages 48-51. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf
- Project underperformance. Underperformance can only be accounted for at the end of the crediting period if the Project's verified carbon sequestration falls below the initial projections (VRUs < PRUs). If such a situation occurs, PRUs will remain unconverted and the Secretariat will proceed with their cancellation. Details regarding the cancellation procedure following a Project's underperformance can be found in the ERS Programme document, section "Over/Underperformance", page 44. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

The Secretariat is the only entity responsible for cancelling credits on the Registry. If units from the Buffer Pool are involved in an event leading to cancellation, Buffer Pool units will be cancelled as well.

c) **Discounting**

Discounting, meaning implementing discounts to the initial carbon calculations, happens during the carbon removal quantification, before the conversion of PRUs into VRUs. Such discounts include quantifying leakage, loss events and incorporating results from dynamic baselining. No discounting is made after the issuance.

Details regarding the discounting procedure can be found in the Quantification Methodology for Terrestrial Forests, publicly available at this weblink:

https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

d) **Length of the crediting periods**

The ERS Programme defines the length of a Project's crediting period as forty years. The crediting period includes crediting, monitoring and compensation periods.

Details regarding the crediting period can be found in the M001 document, section "Crediting Period", page 8. This document is publicly available at this weblink:

https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

e) Renewal of crediting periods

The 40-year crediting period cannot be extended or renewed. However, to allow for progressive ambition over time, the Project Design Document (PDD) is revised and adapted every four years. The ERS Programme calls this approach "adaptive management". It requires the Developer to perform every four years:

- A complete field assessment to re-assess the Recovery Wheel and update the Restoration Plan accordingly.
- A Community Consultation to re-assess the needs and aspirations of the Stakeholders and update the Social Additionality Plan and the Leakage Mitigation Declaration accordingly.
- An update to the Project Budget

An updated PDD is then published on the ERS Registry.

Details regarding the Adaptive Management approach can be found in the ERS Programme document, pages 35-36. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

Question 3.4 <u>Identification and Tracking</u>

Does the programme utilize an electronic registry or registries? (*Paragraph 2.4.2*)	☑ YES

Provide web link(s) to the programme registry(ies) and indicate whether the registry is administered by the programme or outsourced to a third party (*Paragraph 2.4.2*):

The ERS Registry is currently accessible at https://www.ers.org/registry. An updated version of the Registry, hosted by APX, the international leader in registry services, will be available in the upcoming weeks at registry.ers.org. The implementation of the ERS Registry on APX software was supposed to be live by the end of last year but is being delayed. APX is deeply sorry for the delay and remains available to discuss any detail regarding the ERS Registry at:

- Danielle King, Vice President – Registry Solutions
- Mobile: +1 845.598.2345
- dking@xpansiv.com

Does the programme have procedures in place to ensure that the programme registry or registries…:	
a) have the capability to transparently identify emissions units that are deemed ICAO-eligible, in all account types ? (*Paragraph 2.4.3*)	☑ YES
b) identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement? (*Paragraphs 2.4 (a) and (d) and 2.4.4*)	☑ YES
c) identify unit status, including retirement / cancellation, and issuance status? (*Paragraph 2.4.4*)	☑ YES
d) assign unique serial numbers to issued units? (*Paragraphs 2.4 (b) and 2.4.5*)	☑ YES
e) identify in serialization, or designate on a public platform, each unique unit's country and sector of origin, vintage, and original (and, if relevant, revised) project registration date? (*Paragraph 2.4.5*)	☑ YES
f) are secure (i.e. that robust security provisions are in place)? (*Paragraph 2.4 (c)*)	☑ YES

Summarize and provide evidence of the procedures referred to in a) through f), including the availability to the public of the procedures referred to in b), d), and f):

a) Identification of ICAO-eligible units

Assets, namely VRUs in the context of the ERS Programme, meeting the eligibility requirements for ICAO's CORSIA will be labelled as such. Only Secretariat Agents can apply labels to Restoration Units. Labels will be reflected in the data warehouse views, specifically in the "reports" and "detail" pages of the ERS Registry once hosted by APX. Retroactive labelling is applied for previously issued units, ensuring compliance with international standards.

b) Unit transfers

- Secretariat-Initiated Transfers. Amongst ERS, only Secretariat Agents can initiate transfers of PRUs and VRUs. These transfers can originate from the Project Account and be directed to any Account Holder's account. The Secretariat is also responsible for converting units, allocating units in the Buffer Pool, cancelling units and replacing them in case of unavoidable reversals. Refer to question 3.3 for more information on cancellations.
- Account Holder-Initiated Transfers. Account Holders can initiate proprietary PRUs and VRUs transfers at their discretion. The ownership of a unit will be publicly disclosed in the "Holding Reports" view of the Registry once hosted on APX.
- Units cannot be transferred out of the ERS Registry. All transfers are tracked and reported in real-time, using the "Transfer Report" view of the Registry once hosted on APX.

c) Unit status

Each Restoration Unit holds a status. The ERS Programme defines three statuses:
- "Active" which refers to units that are not retired nor cancelled
- "Retired" which refers to units which have been claimed by an Account Holder
- "Cancelled" which refers to units which have been cancelled following a reversal event, a Project failure, a double-counting event or a Project underperformance.

This status is visible for every unit in the Registry. A filter system is being developed by APX to be able to search and view units by status.

d) Serial numbers

All units within the ERS Registry are assigned a unique serial number with the following format: *ERS-[project type]-[project id]-[countrycode]-[unit type]- [issuance date or vintage]-[batch]-[block start]-[block end]* with:
- System Identifier or Originating Registry: ERS
- Project Type: 0 - for Reforestation; 1 - for Terrestrial Forest Restoration
- Country Code
- Unit Type
- Issuance date (for PRU) or vintage (for VRU)
- Batch Number: Numeric value assigned to each batch of credits per originating issuance.
- Serial Block Start: Numeric values assigned by the Registry from 1 - 999,999,999.
- Serial Block End: Numeric values assigned by the Registry from 1 - 999,999,999.

Details regarding the serial number applied to ERS Restoration Units can be found in the Registry Procedures document, section "Labelling and Serialisation", pages 22-23. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf

e) Serialisation

All units within the ERS Registry are assigned a unique serial number with the following format: *ERS-[project type]-[project id]-[countrycode]-[unit type]- [issuance date or vintage]-[batch]-[block start]-[block end]*

The Project registration date is not included in the serialisation but is available in the Project Registry page, which includes a history of each Project document and their latest revision. The Project Registry page and its

accompanying documents are available to the public at this weblink: https://www.ers.org/registry.

f) Security provision

The ERS Registry is hosted by APX, which is SOC2 certified and was recently audited to verify the Registry's compliance with the highest security standards. Such requirements are enshrined in Appendix II of the ERS contract with technical provider APX. Appendix II of the contract will be attached as supporting evidence to this form at the time of submission.

Details regarding the security provisions of the ERS Registry can be found in the Registry Procedures document, section "Security Compliance", pages 25-29. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf

If the programme registry has the capability to directly transfer units to/from any other registries that are not operated by the programme, list any/all other registries to which the programme's registry(ies) are linked: (*Paragraph 2.4 (e)*)

The ERS Programme Registry is not yet linked to other registries. As of the current policy and operational framework, ERS' Restoration Units held within the ERS Registry cannot be transferred out of the APX Registry. This restriction is in place to ensure the integrity, tracking, and transparency of Restoration Units' transactions while maintaining consistency within the APX registry ecosystem.

We are however currently assessing the feasibility of linking the ERS Registry with CAD Trust and aim to integrate our Registry data before the end of 2024.

List any/all international data exchange standards to which the programme's registry(ies) conform: (*Paragraph 2.4 (f)*)

N/A

Are policies and robust procedures in place to…	
a) prevent the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services? (*Paragraph 2.4.6*)	☑ YES
b) ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated? (*Paragraph 2.4.6*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

a) Preventing Conflicts of Interest in Programme Registry Administration.

The ERS Programme has established a robust framework to prevent financial, commercial, or fiduciary conflicts of interest for all its Agents, including Registry Administrators. This framework is anchored in ERS's foundational

Code of Ethics and Business Conduct. It includes the following key elements:

- Code of Ethics and Business Conduct: This foundational document requires ERS Agents to disclose any conflicts of interest and to recuse themselves from decision-making where their interests might affect the outcome. It establishes a clear standard for behaviour and decision-making within ERS.
- Training and Awareness Programs: As part of the prevention strategy, ERS conducts regular training programs for all staff, board members, and contractors. These programs focus on identifying and managing conflicts of interest, ensuring a deep understanding of the ethical standards expected within ERS. As of the 31st of January 2024, all ERS agents have been trained on AML/CTF.
- Declarations of Interest: A crucial part of the prevention strategy is the requirement for ERS Agents and Third Parties to disclose all potential conflicts of interest. This comprehensive disclosure process ensures transparency and accountability from the outset of any engagement with ERS. All current ERS Agents have completed these declarations and these forms are securely stored and reviewed every four years.
- Assessment of Third Parties: ERS conducts thorough assessments of third parties to identify potential conflicts of interest before engaging with them. This process is part of the broader strategy to effectively manage relationships and interactions with external entities. As such, ERS conducted a Third-Party screening on the registry technical provider APX.

b) Addressing and Isolating Conflicts of Interest.
ERS has procedures in place to manage instances where conflicts of interest arise. These general procedures also apply to Registry Administrators, ensuring that conflicts of interest are detected, and mitigated.

- Detection Mechanisms:
  - Grievance Mechanism: Allows for the reporting of suspected conflicts of interest or fraudulent activities within ERS. This mechanism is crucial for early detection and is outlined in the Anti-Fraud Policy, ensuring confidentiality and protection for whistleblowers. The Secretariat must delegate the investigation to a third party if a grievance is aired against Registry Administrators or involves Registry operations.
  - Accounting Controls: Regular financial audits and accounting controls are in place to detect any irregularities that could indicate conflicts of interest or other forms of fraud. In addition, starting this year, ERS is audited annually by an external and independent auditing firm.
- Remediation measures. Any claims and suspicions of conflicts of interest are immediately investigated and addressed through corrective measures, including, but not limited to:
  - Disciplinary sanctions. Individuals, including Registry administrators, violating ERS' policies or legal obligations may face disciplinary action, as outlined in the Code of Ethics and Business Conduct.
  - Policy reviews. All incidents, non-compliances and grievances will be analysed to determine if systemic issues require adjustments to ERS' policies or procedures.

The full contents of these procedures can be found in the:

- ERS Code of Ethics and Business Conduct: pages 4-24. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/code-of-ethics-and-business-conduct.pdf
- Anti-Fraud Policy: pages 5-14, "Prevention", "Detection", "Remediation" This document is publicly available at this weblink: https://docs.ers.org/standard1.0/anti-fraud-policy.pdf

- ERS Programme, pages 10-16, "Grievance Mechanism". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf
- Declaration of Interest - Template, pages 3-8, "Introduction" to "Signature". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/declaration-of-interest-template.pdf. All Declaration of Interests signed by ERS Agents will be attached to this form at the time of submission.
- Training of ERS Agents. All certificates of completion of the AMF/CTL training will be attached to this form at the time of submission.
- APX third-party screening. The document will be attached to this form at the time of submission.

Two procedures will be subject to revisions in the next version of the ERS Programme:
- Grievance Mechanism
  - Proposed Revision: To ensure efficient and robust investigations, the Secretariat must delegate the investigation to a Third Party if a grievance is aired against Registry Administrators or involves Registry operations.
  - Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
  - Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.
- Third-Party Screening
  - Proposed Revision: When a company is audited annually by a third party, ERS reserves the right to ask for the audit results instead of performing the full Third-Party Screening procedure.
  - Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
  - Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Are provisions in place…	
a) ensuring the screening of requests for registry accounts? (*Paragraph 2.4.7*)	☑ YES
b) restricting the programme registry (or registries) accounts to registered businesses and individuals? (*Paragraph 2.4.7*)	☑ YES
c) ensuring the periodic audit or evaluation of registry compliance with security provisions? (*Paragraph 2.4.8*)	☑ YES

Summarize and provide evidence of the registry security provisions referred to in a) through c):
   a) Screening
A KYC/AML procedure is required before opening an account on the ERS Registry. Different ERS Entities are responsible for performing such due diligence depending on the type of Account Holder. The table below summarises ERS's due diligence requirements for Buyers and Developers.

	VVBs	Developers	Buyers	Other Third Parties (consultants, brokers,...)
Objective	To collect and cross-check identification information from essential Third Parties before entering into contractual relationships.			To quickly evaluate the reputation and basic credentials of Third Parties before entering into contractual relationships.
Required level of assessment	Third-Party Due Diligence			Third-Party Screening (Third Party Due Diligence if flagged during the screening)
When?	As part of the Accreditation Process	As part of the Feasibility phase	Before entering the Coalition	Before entering into contractual relationships with ERS.
Responsible ERS Entity	Secretariat	Certification Team	External Relations	Administrative Team

Please note that those due diligences are performed before opening an account on the Registry: Developers can only open an account on the Registry once the Feasibility process is complete, and Buyers can only open an account on the Registry if they are part of the Coalition.

Each due diligence process involves the publication of a Due Diligence Report, which template is publicly available at this weblink: https://docs.ers.org/standard1.0/due-diligence-report-template.pdf.
More details can be found in the ERS Anti-Fraud Policy, publicly available at this weblink: https://docs.ers.org/standard1.0/anti-fraud-policy.pdf

The Third-Party Screening procedure is subject to revisions in the next version of the ERS Programme:
- Proposed Revision: When a company is audited annually by a third party, ERS reserves the right to ask for the audit results instead of performing the full Third-Party Due Diligence procedure. If the audit results show important weaknesses, full due diligence will be performed by the External Relations team before opening an account for the Buyer on the ERS Registry. Buyers will not have to be part of the Coalition to purchase credits.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

b) Account Holders

Only Account Holders who are registered organisations or individuals are allowed to open an account on the ERS Registry. This is the first verification performed in the Due Diligence process.

All requirements for the due diligence process can be found in the Due Diligence Report template, publicly available at this weblink: https://docs.ers.org/standard1.0/due-diligence-report-template.pdf.

c) Audits

ERS Registry technical provider APX is audited every two years to ensure the Registry complies with the highest security standards. Such requirements are enshrined in Appendix II of the ERS contract with technical provider APX. Appendix II of the contract will be attached as supporting evidence to this form at the time of submission.

Question 3.5 Legal nature and transfer of units

Does the programme define and ensure the following:	
a) the underlying attributes of a unit? (Paragraph 2.5)	☑ YES
b) the underlying property aspects of a unit? (Paragraph 2.5)	☑ YES

Summarize and provide evidence of the processes, policies, and/or procedures referred to in a) and b), including their availability to the public:

a) Unit's Underlying Attributes

Unit definition: ERS issues Restoration Unit (RUs). A Restoration Unit represents $1tCO_2e$ associated with biodiversity and livelihood benefits. While the quantification of Restoration Units is directly related to GHG emission removal, ecological recovery, and livelihoods are integral elements of any RU. This definition is publicly available at this weblink: https://docs.ers.org/standard1.0/terminology-references.pdf (page 13).

Unit types: ERS issues two types of units: Projected Restoration Units (PRUs) and Verified Restoration Units (VRUs).

- PRUs represent 1tCO2e that is expected to be sequestered during the Project's crediting period.
- VRUs result from PRUs conversion after an accredited VVB verified the removal of $1tCO_2e$ (one metric ton of carbon dioxide equivalent) from the atmosphere. Verification takes place every two years. Additionally, each VRU has the following attributes:
  - Uniqueness (no double counting - serial number - country code - accreditation - art 6)
  - Real
  - Additional
  - Conservative
  - Permanent within the crediting period

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○ Fungible

The table below provides a visual comparison of both unit types.

	Projected Restoration Units (PRUs)	Verified Restoration Units (VRUs)
Sequestration	Sequestration expected to be achieved in the future	Sequestration achieved & verified
Issuance	At Validation	At Verification
Retirement	No	Yes

More information on the unit types and their attributes can be found in the "Units & Issuance" section (page 40) of the ERS Programme. The document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf.

b) Unit's Underlying Property Aspects

Unit's Proprietor: Every unit in the ERS Registry must have a proprietor who is an Account Holder. Every Account Holder must:

- Accept the legally binding ERS Registry Terms & Conditions (T&Cs) at account creation.
- Go through KYC/AML verification before their account becomes active. Such process is detailed in the Anti-Fraud Policy, publicly available at this weblink:
  https://docs.ers.org/standard1.0/anti-fraud-policy.pdf
- Have the legal capacity to be bound by the Registry's T&Cs (i.e be a registered organisation or individual).
- Not be subject to any type of sanction imposed by the European Union or the United States of America.

Please note that ERS possesses a Buffer Pool that is an Account Holder and owns units.

Unit Proprietor Transfer/Trade: All Restoration Units (PRUs and VRUs) can be traded, sold and exchanged as agreed between buyer and seller, subject to the Registry's Terms & Conditions and ERS' Anti-Fraud Policy. Account Holders can transfer proprietary PRUs and VRUs at their discretion. Every transaction is registered and publicly available in the ERS Registry. Details on transfer and trade can be found in the "Registry Operations" section, pages 8-21 of the Registry Procedures document, publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf.

VRU Retirement: Only account holders can retire VRUs, and must publicly disclose a reason for retirement. Accepted reasons are "Compensation" or "Contribution". Every beneficiary entity must be publicly disclosed in

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the Registry. Detailed explanations can be found in the "Retirement" section, pages 19-20 of the Registry Procedures document, publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf.

Question 3.6 Validation and verification procedures

Are standards, requirements, and procedures in place for… (*Paragraph 2.6*)	
a) the validation of activities?	☐ YES
b) the verification of emissions reductions?	☐ YES
c) the accreditation of validators?	☐ YES
d) the accreditation of verifiers?	☐ YES

Provide evidence of the standards, requirements, and procedures referred to in a) through d), including their availability to the public:

a) **Validation**

ERS has defined the following **requirements** for the Validation of activities:
- General Requirements.
  - VVBs are mandated by the ERS Secretariat and must report to both the Secretariat and the Developer.
  - Validation must be performed in conformance with ISO 14064-3, ISO 14065, ISO 14066 and ISO 17029.
  - VVBs must follow ISO 14064-3 principles, namely: Impartiality; Evidence-based approach; Fair presentation; Documentation and Conservativeness.
  - The VVB must confirm the accuracy of reported data to a reasonable level of assurance, according to ISO 14064 definitions.
  - A VVB cannot audit the same Project more than two consecutive times.
  - Validation shall not begin before the end of the Project Public Comment Period.
  - Validation must occur in the four months following the Project's Assessment.
- Project Validation requirements. The VVB must validate:
  - That the Project meets ERS's eligibility criteria according to ERS Programme;
  - That the Project meets M001 principles on all pillars;
  - The baseline assessments on ERS' three pillars;
  - The Project's Restoration Plan and Social Additionnality Plan;
  - The carbon quantification according to ERS' Quantification Methodology for Terrestrial Forests;
  - The Provisional Project Design Document;
  - The Developer Due Diligence;
  - The Risk Assessment Matrix, and the Safeguards Declaration;
  - The observance of the FPIC process, and the accurate mapping of the Project's Stakeholders;

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○ That relevant documentation has been uploaded to the ERS Registry.

ERS has defined the following **procedure** for the Validation of activities. ERS follows the audit process defined in ISO 17029, and detailed below:

- Pre-engagement: The ERS Secretariat mandates an accredited VVB to perform Validation/Verification and must provide the Project documentation.
- Engagement: The VVB must confirm its availability and sign a legal agreement with ERS, including all the details of the Validation.
- Planning: The VVB must determine the audit plan that will be used to validate the Project.
- Validation Execution: The VVB must perform the Validation activities per the Validation plan communicated beforehand.
- Review: The VVB must communicate the first conclusions and a draft Validation report to reviewers.
- Decision: the VVB must decide whether to validate the Project Design or to suspend Project's certification. Based on this decision, a Validation statement is either issued or not issued.
- Issue of the report: Upon completing the Validation, the VVB is responsible for completing the Validation Report and sharing it with both the ERS Secretariat and the Developer.
- Corrective Action Plan: Upon receiving the Validation/Verification Report, the Developer has thirty calendar days to provide a Corrective Action Plan to tackle the issue(s) raised by the VVB. Along with Corrective Actions, this plan should also establish a system for monitoring its implementation.

The full content of this procedure can be found in the Validation and Verification Procedure document, publicly available at this weblink: https://docs.ers.org/standard1.0/validation-and-verification-procedure.pdf.

- Validation requirements are detailed on page 4, section "General Requirement", and page 6, section "Programme-Specific Requirements".
- Validation procedures are detailed on page 11, section "Audit Process".

The Validation and Verification Procedure is subject to revisions in the next version of the ERS Programme.

- Validation requirements:
    - Proposed revision: VVBs will no longer require the ISO 14066 accreditation to be part of the ERS VVB network.
    - Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
    - Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.
- Audit process:
    - Proposed revisions: the revised process will be as follows:
        - Pre-engagement: similar to the V1 procedure.
        - Planning & Engagement: The VVB must confirm its availability and sign a legal agreement with ERS, including all the details of the Validation. The VVB must determine the audit plan that will be used to validate the Project. A specialised template, the Project Mandate, has been created to collect comprehensive information about the Project, the Validation details and the legal agreement.

- ■ Validation Execution: similar to the V1 procedure.
- ■ Completion: the VVB checks for material misstatements and conformity with the ERS Programme and Methodology. The VVB must reach a conclusion, Draft a first opinion (unmodified, modified, adverse), including a Corrective Action Plan and Complete the Validation Report.
- ■ Corrective Action Plan: similar to the V1 procedure.
- ■ Review: similar to the V1 procedure.
- ■ Final Opinion: the VVB issues the final opinion (Unmodified, Modified, Adverse). For a modified opinion, the opinion shall describe the reason for the modification. The Validation report is publicly shared on the Project Page of the Registry.
  - ○ Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
  - ○ Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

b) Verification

The Validation requirements and procedure previously outlined apply equally to Verification. The only distinctions pertain to specific requirements, which are as follows:

- ● General requirements:
  - ○ The first Verification must occur in the four years following the Project's Validation.
  - ○ Verification must be done every 2 years across Project implementation.
- ● Project Verification requirements. The VVB must verify:
  - ○ Project's Annual Reports;
  - ○ Biennial GHG quantification reports from ERS;
  - ○ All updated documents as part of the four-year period, namely:
    - ■ The updated Project Design Document;
    - ■ The updated Risk Assessment Matrix;
    - ■ The updated Restoration Plan;
    - ■ The updated Social Additionality Plan;
    - ■ The updated Developer Due Diligence.

Evidence of this procedure can be found in the Validation and Verification Procedure, page 11, section "Audit Process". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/validation-and-verification-procedure.pdf

c) Validators' accreditations

ERS has defined the following **requirements** for the accreditation of validators:

- ● Valid ISO 14064, 14065, 14066 and 17029 accreditations.
- ● Practical experience in auditing carbon removal, ecological recovery, and livelihoods and expertise in remote sensing, community-based projects and sustainable development approaches.
- ● English proficiency.

- In addition:
    - VVBs must show commitment to ongoing professional development.
    - VVBs must not have any ongoing judicial processes related to malpractice, fraud, or other activities incompatible with their role as independent Auditing Bodies.
    - VVBs must maintain a publicly available impartiality policy.
    - VVBs must complete and sign ERS' Declaration of Interest and Anti-Fraud Inquiry.

ERS has defined the following **procedure** for the accreditation of validators:

(1) Application: VVBs can apply via the <u>contact form</u> on the ERS website.
(2) Review: The ERS Secretariat will review the application, and if the VVB complies with the Eligibility Criteria, a first call will be scheduled. During the first call the Secretariat exposes ERS' expectations and details about the contractual relationship.
(3) Onboarding: the VVB will be granted full access to Programme materials, training materials and resources, including webinars, online courses, and reference materials.
(4) Training: The ERS Secretariat provides structured training that covers all topics relevant to Validation/Verification. These modules include:
    - The ERS <u>Programme</u>
    - <u>Methodology for Terrestrial Forest Restoration</u>
    - MRV. Provides in-depth training on ERS' MRV requirements and techniques, along with guidance on utilising its associated tools.
    - Reporting and Documentation. Provides in-depth training on ERS' documentation practices, including data collection, record keeping, and reporting requirements. VVBs will have access to sample Validation and Verification reports as templates to understand reporting expectations.
    - Case Studies. ERS integrates practical case studies into the training program. These case studies simulate Validation and Verification scenarios, allowing VVBs to apply their knowledge and problem-solving skills to practical challenges.

These requirements ensure that VVBs engaged in auditing activities possess the necessary expertise, experience, and integrity to conduct credible Validation.

The full content of this procedure can be found in the Validation and Verification Procedure, page 6, section "Expertise" and page 18, section "VVB Accreditation Process". This document is publicly available at this weblink: <u>https://docs.ers.org/standard1.0/validation-and-verification-procedure.pdf</u>

The Validation and Verification Procedure is subject to revisions in the next version of the ERS Programme.
- Accreditation requirements
    - Proposed revision: Accreditation of VVBs will no longer necessitate ISO 14066 accreditation.
    - Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in <u>Question 3.1</u>.
    - Timeline: Upon approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.
- Accreditation procedure

- Proposed revision:
  - Application: no revisions.
  - Review: The ERS Secretariat will schedule a first call. During the first call the Secretariat exposes ERS' expectations and details about the contractual relationship.
  - Application Form: The ERS Secretariat will send the Application Form template. Using the Form, the VVB must demonstrate alignment with ERS criteria. Once the Form is completed, it will be evaluated by the ERS Secretariat, and upon successful review, the process will advance to the subsequent step.
  - Third Party Screening: The ERS Secretariat will send the Third Party Screening Questionnaire to the VVB. Once the Questionnaire is completed, it will be evaluated by the ERS Secretariat, and upon successful review, the process will advance to the subsequent step.
  - Onboarding: no revisions.
  - Training: no revisions.
- Process: this revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

d) Verifiers' accreditation.

As validators and verifiers are the same type of organisation (designated as VVBs), the accreditation requirements and procedure for validators, as described above, are equally applicable to verifiers.

Evidence of this procedure can be found in the Validation and Verification Procedure, page 6, section "Expertise" and page 18, section "VVB Accreditation Process". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/validation-and-verification-procedure.pdf

Question 3.7 Programme governance

Does the programme publicly disclose who is responsible for the administration of the programme? (*Paragraph 2.7*)	☑ YES
Does the programme publicly disclose how decisions are made? (*Paragraph 2.7*)	☑ YES

Provide evidence that this information is available to the public:

a) Public Disclosure of the Programme Administration

The ERS Programme's governance structure is outlined in the ERS Governance document. It specifies the composition and responsibilities of the Executive Team, and its relationship with external and independent

advisory bodies, namely the Technical Advisory Board and the Fiduciary Board.

- The ERS Executive team is responsible for setting the organisation's overall direction and strategy, managing day-to-day operations, and making critical decisions affecting ERS' goals and success. The names and credentials of all Executive team members are publicly disclosed on ERS' website at the following address: https://www.ers.org/mission-and-team.
- The Technical Advisory Board (TAB) is the independent governing body overseeing the Standard. The purpose of the TAB is to offer scientific and technical insights to ERS, and to guarantee the accuracy and robustness of its tools and methodologies. The names and credentials of all Technical Advisory Board members are publicly disclosed on ERS' website at the following address: https://www.ers.org/advisory-board.
- The Fiduciary Board is the independent advisory body safeguarding company assets and Stakeholders' interests. Its purpose is to provide all advice and guidance deemed necessary to protect and safeguard the company's interests and assets, both in terms of good management and the appropriateness and proper conduct of operations. Please note that the Fiduciary Board is being recruited and will be operational by the end of the second quarter of 2024. The names and credentials of all Fiduciary Board members are publicly disclosed on ERS' website at the following address: https://www.ers.org/advisory-board.

The ERS Executive team will be subject to revision in the next version of the ERS Programme.
- Proposed Revision: Adding a Managing Director role to the Executive team.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

b) Public Disclosure of Decision-Making Process

The ERS Governance document details the roles and responsibilities of each entity within ERS, including the Executive Team, Secretariat, Certification Team, R&D Team, External Relations Team and Administrative Team, ensuring that each entity within ERS operates with a clear mandate and accountability.

Additionally, two decision-making forums are statutorily independent of ERS and are the subject of specific policies to guarantee their independence: the Fiduciary Board and the Technical Advisory Board.
- The Fiduciary Board document outlines the structure and function of the Fiduciary Board, which serves as an independent advisory body safeguarding company assets and Stakeholders' interests. The document also details the Board's meeting protocols and decision-making procedures, ensuring open governance. The criteria for member selection, terms of service, and conflict-of-interest policies underscore the Board's role in upholding transparency within ERS' decision-making processes.
- The Technical Advisory Board (TAB) document clearly describes the role and functioning of the Technical Advisory Board, which is responsible for all modifications of the Standard. It outlines the TAB's authority over the Standard Revision Procedure and its independence from ERS, ensuring that decisions are made with scientific and technical integrity. As such, TAB members gather during monthly regular decision-making meetings and may request ad-hoc meetings to discuss additional topics. They can also

mandate working groups to conduct in-depth analyses on specific topics requiring external expertise. Furthermore, the Terms of Reference for TAB members detail the precise scope and working modalities for the participation of each member in the TAB.

Finally, the Standard Revision Procedure sets forth the precise process by which the Programme and its methodologies are amended (please refer to Question 3.1 for more details). To keep a record of these decisions, the Secretariat ensures that all versions of the Standard documents as well as every version of each Standard Revision Procedure document are securely stored and publicly disclosed on the "Public Reports" page of the ERS website.

The full contents of these procedures can be found in the:
- Programme: pages 8-20, "Governance & Safeguards". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf
- ERS Governance, pages 6-13, "ERS Entities Roles & Responsibilities". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/ers-governance.pdf
- Fiduciary Board, page 3, "Role". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/fiduciary-board.pdf
- Technical Advisory Board, page 3, "Role". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/technical-advisory-board.pdf
- Standard Revision Procedure, pages 4-12, "Revision Procedure" and "Appendix 1". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/standard-revision-procedure.pdf

The TAB Governance procedure is subject to revisions in the next version of the ERS Programme.
- Proposed Revisions:
  - Implementation of a co-chair mechanism to improve TAB governance.
  - Quarterly meeting for TAB members with the Secretariat. Co-chairs can organise ad-hoc meetings according to the TAB members' availability, especially to discuss and ratify standard revisions.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Can the programme demonstrate that it has… (*Paragraph 2.7.2*)	
a) been continuously governed for at least the last two years?	☑ YES
b) been continuously operational for at least the last two years?	☑ YES
c) a plan for the long-term administration of multi-decadal programme elements?	☑ YES
d) a plan for possible responses to the dissolution of the programme in its current form?	☑ YES

Provide evidence of the activities, policies, and procedures referred to in a) through d):

a) Programme Governance

ERS has been continuously governed for over 3 years. ERS was incorporated on December 10th, 2020. A certificate of incorporation will be attached to the application email as supporting evidence.

b) Programme Operations

ERS has been continuously operating as a standard-setting body for over 2 years. After a full year of research and development, the ERS Programme finalised its V0.9 Programme and M000 methodology on March 1st, 2022. The first Projects certified under this version began in April 2022. As supporting evidence, V0.9 documentation and information relating to certified Projects are publicly available at the following weblinks: https://www.ers.org/documentation-v0-9; https://www.ers.org/registry.

An updated version of the Standard and its M001 methodology was put out for public consultation in March 2023, and a V1 was published in November 2023. The ERS Programme currently certifies Projects under V1.

c) Programme Administration Plan

ERS intends to administer the Programme for multi-decadal timeframes. The operating model and fee structure have been developed to ensure that ERS has sufficient annual income to maintain its operations over the long term. ERS charges on a per hectare per year basis for the entire duration of every Project (40 years), with provisions that allow ERS to adjust the fees over time (to account for inflation and other factors that could increase our operational costs. More information regarding our Fee Structure is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf (pages 16-18).

Moreover, the ERS Programme has a plan for its long-term administration. This plan is outlined in several key components:
- Systematic Review Process: The ERS plan includes a systematic procedure for reviewing programmatic elements. This ensures the program remains relevant, effective, and aligned with current scientific, market, and regulatory developments.
- Regular Evaluations: The program undergoes evaluations every four years. These evaluations are critical for assessing the performance of various program elements and making necessary adjustments.
- Responsibilities of the ERS Secretariat: The ERS Secretariat plays a central role in this process. It is responsible for initiating, coordinating, and overseeing these evaluations. This includes gathering feedback from all ERS entities and ensuring the review process is comprehensive and well-managed.
- Comprehensive Reporting: Different ERS entities, including the Secretariat, Fiduciary Board, Engineering Team, Certification Team, and Executive Team, must submit detailed reports. These reports cover various aspects of the program, such as Registry maintenance, network performance, methodological improvements, governance, legal compliance, and financial stability.
- Incorporation of Stakeholder Feedback: The plan emphasises the importance of including feedback from stakeholders, such as Developers, buyers, and validators/verifiers, in the review process. This helps in aligning the program with the needs and expectations of its participants.
- Use of Evaluation Metrics: Using a traffic light system (green, yellow, red) in the reports provides a clear

and straightforward method for assessing the status of each program element. This aids in identifying areas that require immediate attention or improvement.

- Long-Term Strategy Development: Based on the findings of the evaluations and reports, the ERS Secretariat, in conjunction with the Executive team, develops a multi-decadal strategy. This strategy includes defining the mission, vision, and values of the ERS, setting objectives for growth and methodology development, and planning resource allocation.

- Provisions for Continuity: The plan includes provisions for the continuity of the program in case of potential dissolution. A partnership with external entities ensures that the programme can be sustained and its obligations met even in unforeseen circumstances.

The full procedure for administering the programme elements is detailed in ERS' Long-term Administration Plan. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/ers-administration-plan.pdf

d) Responses to potential programme dissolution

In the unlikely event that ERS is no longer able to oversee its Programme, or foresees that this may be the case within the next 4-year period, ERS must transfer the management of its Programme, methodologies, Registry, and active Projects to another operating entity. The operating entity will be chosen by the TAB, from a list of available options.

ERS is building agreements with several operating entities to mitigate counterparty risk. Agreements have been put in place between ERS and two other certification entities, with more to come:

- CERTIFICADORA DE CARBONO S.A.S. (CERCARBONO), a company incorporated under the laws of Colombia (company registration number 901025991-0) with its offices at [Calle 7 Sur # 42 70 Office 1707, Colombia] ("Cercarbono").

- RIVERSE, Société par actions simplifiée ("Simplified Joint stock company"), a company incorporated under the laws of France (company registration number 908 082 332) with its offices located at 28, avenue des Pépinières 94260, Fresnes (France)

The agreement includes:

- Support of obligations. In the event of dissolution of either Party, the other Party shall ensure that it will act as a substitute for the registration and certification of Projects registered at the time of dissolution.

- Data and information provision. The party presenting the dissolution must ensure the provision of complete information on Projects and credits in order to be able to assume the obligations as a certification programme.

- Periodic exchange and cooperation. The Parties will be willing to exchange information on the methods by which the procedures and normative structures governing each other's programmes would be integrated.

As supporting evidence, the two MOUs signed with both standards will be attached to the application email.

Are policies and robust procedures in place to…	
a) prevent the programme staff, board members, and management from having financial,	☑ YES

commercial or fiduciary conflicts of interest in the governance or provision of programme services? (*Paragraph 2.7.3*)	
b) ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated? (*Paragraph 2.7.3*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

In line with ERS' foundational Code of Ethics and Business Conduct, a comprehensive set of procedures is in place to identify and mitigate conflicts of interest (COI) between staff, board members, contractors, and Projects. The Code of Ethics and Business Conduct requires individuals to disclose any COI and to recuse themselves from decision-making processes where their interests might affect the outcome. To enforce this Code, ERS has set forth the Anti-Fraud Policy, encompassing COI management, anticorruption, and Anti-money Laundering and Counter-terrorism Financing (AML/CTF). It is structured around a 'three lines of defence' model:

- Prevention. It includes continuous training on COI, Declarations of Interest, and the assessment of Third Parties.
- Detection: This line includes a Grievance Mechanism and accounting controls to promptly identify any signs of fraudulent activities.
- Remediation: In case of detected fraud, the Anti-Fraud Policy outlines the steps for implementing corrective measures and disciplinary sanctions.

More specifically, the Anti-Fraud Policy encompasses the following key process:

- The Declaration of Interest mandates that all ERS Agents and Third Parties disclose all potential COI. This comprehensive disclosure covers material transactions, family relationships, or any type of affiliation that could lead to a COI, ensuring transparency and accountability from the outset of any engagement with ERS. This document must be updated by ERS Agents and Third Parties every four years. Additionally, Third Parties must update ERS on any changes to their situation that may influence an individual's relationship with ERS and its activities.
- Technical Advisory Board (TAB) Members are also bound to avoid significant COI and must sign the Declaration of Interest. In case of a conflict, they must disclose it and, if necessary, recuse themselves from related decision-making processes.
- Due Diligence Reports are employed to manage potential or existing COI proactively. They include verifying the accuracy of information from third parties and ensuring their competence, legal compliance, and alignment with ERS values. The ERS investigator must cross-check data provided by Third Parties through WorldCheck and other registries, and perform discrepancy checks, risk alert level assessments, and a summary of findings. Reports with a global alert level of 3 or higher are reviewed by the Secretariat and may lead to reevaluating business relationships with entities known for malpractice.

Additionally, ERS maintains the integrity and independence of its certification activities by separating operational and commercial functions. As such, it is prohibited for the External Relations team to:

- influence the certification process at any stage;
- participate in meetings regarding ongoing certification processes;
- directly sell issued carbon credits (Restoration Units under the ERS Programme).

Likewise, Certification team members are not allowed to:

- provide the External Relations team with strategic information on a specific Project. The External Relations team can only access a Project's documentation once it is publicly disclosed on the ERS Registry;
- participate in any online or in-person event involving a potential Developer or Buyer outside the scope of their work. Certification team members cannot engage with current or potential Developers or Buyers outside of their work on ERS' certification activities.

Regular training and assessments on AML/CTF, ERS's Anti-Fraud Policy and Code of Ethics and Business Conduct are conducted to ensure that all Agents understand and can rigorously apply these policies. As of the 31st of January 2024, all ERS agents have been trained on AML/CTF. Training certificates will be attached to the application at the time of submission.

The full contents of these procedures can be found in the:

- ERS Code of Ethics and Business Conduct: pages 4-24. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/code-of-ethics-and-business-conduct.pdf
- Anti-Fraud Policy: pages 5-14, "Prevention", "Detection", "Remediation" This document is publicly available at this weblink: https://docs.ers.org/standard1.0/anti-fraud-policy.pdf
- Declaration of Interest - Template, pages 3-8, "Introduction" to "Signature". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/declaration-of-interest-template.pdf
- ERS Governance, pages 6-13, "ERS Entities Roles & Responsibilities". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/ers-governance.pdf
- Programme: pages 8-20, "Governance & Safeguards". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

If the programme is not directly and currently administered by a public agency, can the programme demonstrate up-to-date professional liability insurance policy of at least USD$5M? (*Paragraph 2.7.4*)	☑ YES

Provide evidence of such coverage:

ERS holds a professional liability insurance policy of 9M€ for the year 2024. As supporting evidence, an insurance certificate will be attached to the application email.

Question 3.8 Transparency and public participation provisions

Does the programme publicly disclose… (*Paragraph 2.8*)	

a) what information is captured and made available to different stakeholders?	☑ YES
b) its local stakeholder consultation requirements (if applicable)?	☑ YES
c) its public comments provisions and requirements, and how they are considered (if applicable)?	☑ YES

Provide evidence of the public availability of items a) through c):

a) Publicly available information

ERS publicly discloses on its website:

- Core documents
- Methodology guidelines and templates
- Governance documents and templates
- Validation and Verification documents and templates
- Grievance Resolution Reports
- Annual ERS Audit Reports
- ERS' Annual Reports
- Executive Team
- All ERS Team Members
- TAB Members
- TAB Meeting Notes
- Fiduciary Board Members
- Standard Revisions
- Public Comment Digest
- VVBs status
- VVBs Performance Reports

This list is publicly available in the ERS Programme document, section "Transparency", page 19. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

ERS must publicly disclose on the Registry:

- At the Feasibility stage
  - Feasibility Study Report
  - Shapefile of the Project Area
  - Shapefile of the Reference Ecosystem
  - Livelihood Matrix (stakeholder mapping tab only)
- At the Assessment stage
  - Provisional Project Design Document
  - Risk Assessment Matrix
  - Shapefiles of the control plots
  - Livelihood Matrix
  - Leakage Mitigation Declaration
  - Ecological Restoration Assessment.

- ○ Safeguards Declaration
- ○ SDG Contribution
- ○ Project Budget
- At the Validation stage
    - ○ Validation report
    - ○ Final Project Design Document
- Every year
    - ○ Annual Report
    - ○ Seedlings Monitoring Report (until year 4)
    - ○ Grievance Reports
- At the Verification stage
    - ○ Verification report
- At the "Adaptive Management" stage, every four years
    - ○ Updated Project Design Document
    - ○ Updated Risk Assessment Matrix
    - ○ Updated Livelihood Matrix
    - ○ Updated Leakage Mitigation Declaration
    - ○ Updated Ecological Restoration Assessment.
    - ○ Updated Safeguards Declaration
    - ○ Updated SDG Contribution
    - ○ Updated Project Budget

This list is publicly available in the Registry Procedures document, section "Documentation", pages 11-13. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf

b) Local stakeholder consultation requirements

ERS requires stakeholder consultations to start taking place in the certification process during the Feasibility Study phase, at the very beginning of the Project design. Stakeholders must actively participate in the Project Design including in the delimitation of the Project Area, Reference Ecosystem and Site, baseline assessments, the definition of objectives, and the interventions' planning. The Developer must record the Stakeholders' attendance at consultations and document the stakeholders' suggestions to amend the Project's implementation plan.

Throughout the certification process, stakeholder consultations are structured as three main events:

- Feasibility Interviews
- Ecological Recovery Community Consultation
- Livelihood Community Consultation

When Indigenous People and Local Communities (IPLCs) are among the Project's Stakeholders, the consultations must follow ERS' Free, Prior and Informed Consent guidelines. The result of all consultations must be shared with IPLCs in a transparent and accessible manner (in the local language, using comprehensible vocabulary, widely accessible channels and, if necessary, using other types of support such as drawings, schemas, and videos).

The ERS Programme requires the Developer to publicly report on the consultations and how the resulting inputs are integrated into the Project in the PDD and Annual Reports. More precisely in the following sections:

- Project Design Document (PDD)
  - Ecological Recovery (page 18) - 'Summary of findings of the Community Consultation on Ecological Recovery'
  - Livelihood (pages 20-21) - 'Livelihood Baseline' and 'Social Additionality Plan'
  - Appendix 6 - Ecological Recovery Assessment, tabs 'Participatory Mapping' and 'Interventions'
  - Appendix 8 - Livelihood Matrix, all tabs
  - Appendix 9 - Community Consultation Reports
- Project Annual Reports
  - Ecosystem Recovery - 5. Community Consultation (page 8)
  - Livelihood - 6. Community Consultation (page 14)

Consultations should continue regularly throughout the Project's lifetime to ensure ongoing Stakeholder engagement.

The full content of these procedures can be found:
- Details on the definitions, types, objectives, preparation and the expected results of these consultations are publicly disclosed in the Community Consultation Guidelines document, available at this weblink: https://docs.ers.org/standard1.0/community-consultation-guidelines.pdf
- ERS' Free, Prior and Informed Consent guidelines are publicly available at this weblink: https://docs.ers.org/standard1.0/free-prior-and-informed-consent-fpic-guidelines.pdf
- All requirements regarding stakeholders consultations and engagement are included in the M001 document, section "Eligibility Criteria" page 9, section "Ecological Recovery", page 20 and section "Livelihoods", pages 33-34 and 37-39. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

c) Public Comment provisions
Please refer to the answer below.

Does the programme conduct public comment periods relating to… (*Paragraph 2.8*)	
a) methodologies, protocols, or frameworks under development?	☑ YES
b) activities seeking registration or approval?	☑ YES
c) operational activities (e.g., ongoing stakeholder feedback)	☑ YES
d) additions or revisions to programme procedures or rulesets?	☑ YES

Summarize and provide evidence of any programme procedures referred to in a) through d):

Standard-level Public Comment Periods

The ERS Programme defines the grounds for conducting a public comment period in its Standard Revision Procedure. Requirements for a Public Comment Period depend on the typology and content of a standard revision, and whether the ERS Technical Advisory Board thinks useful to include Stakeholders' and market feedback.

- Developments of new methodologies, protocols and frameworks. All methodological developments, including developing methodologies for different types of offset activities are conducted by the ERS Programme, specifically the Secretariat and the R&D team, in collaboration with the Technical Advisory Board. New methodologies must be approved via the methodology development process described in the Standard Revision Procedure and must undergo a Public Comment Period.
- Revision Propositions
  - Direct Revisions do not undergo Public Comment Periods.
  - The TAB must require a Public Comment Period if the Standard Revision Proposition modifies one or more of the following elements of the Standard and its affiliated documents:
    - Methodology. All methodology principles and methods, particularly documents regarding the qualification and quantification of GHG emission removals.
    - Governance. All documents regarding the internal rules and organisation of ERS, as well as its relation to Third Parties, especially regarding conflicts of interest, anti-corruption and anti-fraud.

When a Public Comment Period is necessary, a call for Public Comment Period is organised by the Secretariat for at least thirty consecutive days. The Call for Public Comment will be published on the ERS website and social media, and the Secretariat must proactively reach out to identified key Stakeholders, including local stakeholders where Projects are certified. The Secretariat then assesses all contributions received during the consultation and summarises them in a Consultation Digest published no more than 75 consecutive days from the closing date.

Details regarding Public Comment Periods can be found in the:
- Standard Revision Procedure, section "Public Comment Period", pages 6-7. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/standard-revision-procedure.pdf
- ERS Programme, section "Programme Procedures", pages 21-23. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

Requirements for Public Comment Periods will be subject to revisions in the next version of the ERS Programme.
- Proposed Revision: Only major changes to existing methods and the development of new methodologies will require a Public Comment Period. The decision to require a Public Comment Period for other types of changes will be left to the discretion of the TAB.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Ongoing Stakeholder Feedback
ERS does not conduct public comment periods on its operational activities but holds a grievance mechanism

accessible 24/7 via multiple channels, where stakeholders can file complaints, alerts, or any grievances related to non-conformities regarding the programme, an ERS-certified Project and/or potential suspicious activities. The Grievance Mechanism is accessible via this weblink: https://www.ers.org/grievances

Question 3.9 Safeguards system

Are safeguards in place to address… (*Paragraph 2.9*)	
a) environmental risks?	☑ YES
b) social risks?	☑ YES

Summarize and provide evidence of the safeguards referred to in a) and b), including their availability to the public:

The ERS Programme has three key measures to ensure safeguards are in place to address social and environmental risks.

1. **Eligibility Criteria and Safeguards Declaration**

To meet the ERS eligibility criteria, Projects must abide by and comply with a minimum of environmental and social safeguards. These include:
- The Universal Human Rights and Freedoms as defined by the Universal Declaration of Human Rights
- The International Covenant on Economic Social and Cultural Rights
- The International Covenant on Civil and Political Rights
- Any other instrument ratified by the Project's host country on Human Rights.
- The International Labour Organization (ILO) declaration on Fundamental Principles and Rights at Work and its follow-up
- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and ILO's Convention 169 on Indigenous and Tribal Peoples
- Stringently following the Free, Prior, and Informed Consent (FPIC) guidelines process when directly or indirectly impacting Indigenous Peoples and Local Communities (IPLCs).
- Implementing a robust and fair benefit-sharing mechanism that is agreed upon by all parties
- Securing environmental integrity
- Preventing the displacement or involuntary resettlement of resident or their economic activities.

Developers are requested to identify and declare the measures in place to comply with the environmental and social safeguards using the Safeguards Declaration. Where the Project does not comply and/or poses an existential risk to the safeguards, a mitigation plan and the indicator(s) and methodology are requested to monitor the mitigation action(s). When a mitigation plan is submitted, Developers must monitor and report its progress annually. The Safeguards Declaration must be renewed every four years as part of the adaptive management approach taken by the ERS Programme. During the Certification and MRV processes, if an ERS

Certification Agent or a VVB deems the proof and/or mitigation measure(s) put in place is not compatible with the Methodology's eligibility criteria, the Project's needs or if they have a reasonable doubt of its effectiveness, they will request clarification or corrective actions to be implemented. If reasonable doubt persists, the Project will not be certified.

As supporting evidence,
- The complete list of environmental and social safeguards requested can be found in the Methodology for Terrestrial Forest Restoration, section "Eligibility Criteria", page 10, publicly available at this weblink: https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf
- The "Safeguards Declaration" template is publicly available at this weblink: https://docs.ers.org/standard1.0/safeguards-declaration.xlsx. Each Project's declaration is annexed to the Project Design Document (PDD) and published in the ERS Registry as part of the Project documentation.

The Safeguard Declaration section will be subject to revision in the next version of the ERS Programme.
- Proposed Revision: move the Safeguards Declaration section out of the Eligibility Criteria and as part of the Risks Assessment section of the ERS Programme document.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: this revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

2. Risk Matrix

The Certification process includes a multidimensional risk assessment of every Project, which includes social and environmental risks. The Risk Matrix evaluates different risk categories and the type of risk they pose. Each risk is evaluated based on its likelihood of happening and the severity of its consequences, assessed on a scale from 0 to 5 following the definition provided by the table below.

Risk evaluation	
Likelihood – What are the chances that the risk will happen ?	Severity – If the risk happens, what will be the intensity of the damage caused?
0 – Not Applicable	0 – Not Applicable
1 – It is very unlikely to happen	1 – If it happens, consequences do not require correction
2 – It is unlikely to happen	2 – If it happens, consequences will require minor Project correction
3 – It has a 50% chance of happening	3 – If it happens, it will partially damage the Project but not lead to failure as consequences can still be reversed
4 – It is very likely to happen	4 – If it happens, it will considerably damage the Project, financially, environmentally, and/or socially, leading to parcial Project failure
5 – It is already happening or is inevitable	5 – If it happens, the Project will fail

The risk score attributed to each individual risk is the multiplication of both scores (likelihood and severity) and can range from 0 to 25. The risk score is then treated following the table below.

Evaluation Matrix and Treatment Requirements						
Severity → / **Likelihood** ↓	0	1	2	3	4	5
0	No Risk	No Risk	No Risk	No Risk	No Risk	No Risk
1	No Risk	Risk is retained and active monitoring is mandatory	Risk is retained and active monitoring is mandatory	Risk is retained and active monitoring is mandatory	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Plan can include risk sharing strategy.	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Risk sharing strategy is not acceptable.
2	No Risk	Risk is retained and active monitoring is mandatory	Risk is retained and active monitoring is mandatory	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Plan can include risk sharing strategy.	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Risk sharing strategy is not acceptable.	Mitigation plan must be implemented in the first phase of the Project to reduce the risk's likelihood. Risk sharing strategies are acceptable to reduce risk's severity.
3	No Risk	Risk is retained and active monitoring is mandatory	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Plan can include risk sharing strategy.	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Risk sharing strategy is not acceptable.	Mitigation plan must be implemented in the first phase of the Project to reduce the risk's likelihood. Risk sharing strategies are acceptable to reduce risk's severity.	Mitigation plan must be implemented in the first phase of the Project to reduce the risk's likelihood. Risk sharing strategies are acceptable to reduce risk's severity.
4	No Risk	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Plan can include risk sharing strategy.	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Risk sharing strategy is not acceptable.	Mitigation plan must be implemented in the first phase of the Project to reduce the risk's likelihood. Risk sharing strategies are acceptable to reduce risk's severity.	Mitigation plan must be implemented in the first phase of the Project to reduce the risk's likelihood. Risk sharing strategies are acceptable to reduce risk's severity.	The risk source must be removed, or its likelihood and severity brought to level 3 or below **BEFORE** the project can be certified.
5	No Risk	Mitigation plan to change the risk's likelihood and/or severity must be outlined before the project starts. Risk sharing strategy is not acceptable.	Mitigation plan must be implemented in the first phase of the Project to reduce the risk's likelihood. Risk sharing strategies are acceptable to reduce risk's severity.	Mitigation plan must be implemented in the first phase of the Project to reduce the risk's likelihood. Risk sharing strategies are acceptable to reduce risk's severity.	The risk source must be removed, or its likelihood and severity brought to level 3 or below **BEFORE** the project can be certified.	The risk source must be removed, or its likelihood and severity brought to level 3 or below **BEFORE** the project can be certified.

When a risk exists, the Developer is requested to submit a surveillance and/or mitigation plan with its monitoring methodology. ERS defines the monitoring schedule at its discretion, and results must be publicly disclosed as part of the Project's Annual Reporting. The risk evaluation is performed by an ERS Certification Agent, based on all the documentation submitted by the Developer at Certification (year 0). The Risk Assessment is renewed every 4 years. The Risk Matrix is annexed to the PDD and is made publicly available in the ERS Registry once the Project is certified. Similarly to the Safeguards Declaration, if the Certification Agent or a VVB deems the proposed surveillance and mitigation plans proposed by the Developer do not address the concerned risk sufficiently, the Project can be denied certification or have its certification suspended or terminated. This risk management approach ensures a holistic assessment of a Project's impacts and compliance with environmental and social safeguards.

The ERS Risk Management approach can be accessed in the M001 document, section "Risk Management", page 42. This document is publicly available at this weblink:
 https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

3. **ERS' Social and Ecological Additionality Methodology**

The ERS Programme has taken an approach that goes beyond "safeguards" and "no net harm" principles. By devising the concepts of social and ecological additionality, ERS ensures that Projects positively contribute to the social and environmental context of the Project Area.

ERS defines **social additionality** as the "observed social benefits related to outcomes that can be attributed to the Project activity and would not have occurred in the absence of the Project activity"; and **ecological additionality** is described as "measurable and verifiable ecological improvements that would not have happened without the specific intervention of the restoration project". Requirements and methods for attaining social and ecological additionality are applied stringently by the Certification team:

- The Project's activities and consequent social and ecological additionality are described in its PDD, specifically in the Social Additionality Plan and Restoration Plan
- Progress in the implementation of such plans is assessed annually in the Annual Reports.
- Projects that fail to provide solid Restoration and Social Additionality plans cannot be certified, and where the annual reports do not show progress towards the established targets cannot maintain their certification.

The complete list of requirements and methods can be found in the M001 document, sections "**Ecological Recovery**" pages 13-21 and "**Livelihoods**" pages 32-41. This document is publicly available at this weblink https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

Question 3.10 Sustainable development criteria

Does the programme use sustainable development criteria? (*Paragraph 2.10*)	☑ YES
Does the programme have provisions for monitoring, reporting and verification in accordance with these criteria? (*Paragraph 2.10*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

As part of its eligibility criteria, ERS requires Projects to strive to contribute to at least one of the United Nations Sustainable Development Goals (SDGs) in addition to SDGs 13 (Climate action) and 15 (Life on land), which are inherently included in all ERS-certified Projects, given the Project scope of the certification eligibility. When applicable, Developers must align the Project's SDG contributions to that of the host country's strategy for sustainable development and the Nationally Determined Contribution (NDC).

Developers are requested to declare the Project's contribution using the SDG Contributions template, and to select the target and indicators to measure and monitor the impact, when possible referring to the Global indicator framework for the SDGs and targets of the 2030 Agenda for Sustainable Development. Developers are requested to measure and report progress to the SDG contributions annually using the selected indicators. The SDG Contributions template must be renewed every 4 years to reflect the updated objectives of the Project. The SDG Contribution template is available in the weblink https://docs.ers.org/standard1.0/sdg-contribution-template.xlsx.

The SDG Contribution template is included in the Project Design Document at certification and to the Annual Reporting template during the MRV phase throughout the crediting period. All documentation is made publicly available on the ERS Registry.

Details on ERS' requirements for sustainable development criteria can be found in the Methodology M001, Eligibility Criteria section, item 9 Sustainable Development Goals (page 10) available in the weblink https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf.

Question 3.11 Avoidance of double counting, issuance and claiming

Does the Programme provide information on how it addresses double counting, issuance and claiming in the context of evolving national and international regimes for carbon markets and emissions trading? *(Paragraph 2.11)*	☑ YES

Summarize and provide evidence of the information referred to above, including its availability to the public:

In the context of evolving national and international regimes for carbon markets and emissions trading, ERS has implemented several measures to prevent double counting of carbon credits, encompassing double issuance, double use, and double claiming. These measures ensure that a single ton of greenhouse gas (GHG) emission removal is not attributed to more than one mitigation target, pledge, obligation, or mitigation commitment effort.

a) Double issuance

To avoid double issuance, ERS has established the following requirements:

- Activities registered under another carbon crediting Programme are not eligible for ERS certification. Restoration units must be credited to Projects that have not received carbon credits for past activities. The main registries around the world are verified by an ERS Certification Agent before the Project's certification to ensure they are not part of another carbon programme.
- Projects that have been previously declined by another carbon crediting scheme due to eligibility or procedural standards can only be eligible for ERS certification upon providing conclusive evidence of the official grounds for rejection.
- Projects that have applied to other carbon crediting programs and have undergone Validation by a VVB can only apply for ERS certification if they submit proof that their former application was cancelled and no credits were issued.
- Projects that are or have been registered with other carbon crediting programs can only apply for ERS certification if their activities occur in areas not included in their former projects.
- In addition, ERS also screens independent registries of carbon crediting programs to verify no double registration or double issuance of an activity by a Developer has occurred. If an activity is found to be registered with another carbon crediting program, the Project is rejected.

More details on this procedure can be found in Programme, page 31, section "Double Issuance". This document

is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

b) Double use

To avoid double use, the ERS Registry specifically incorporates the following features:

- Transparent management of the issuance, transfer, retirement and cancellation of Restoration Units (RUs).
- Serialisation and labelling of issuances so that each RU is associated with a specific Project, country, issuance block and vintage.
- A unit can only be owned by one account at a time within the ERS Registry and cannot be transferred out of such Registry.
- Public disclosure of all of the Project's documentation and geographical coordinates.

More details on this procedure can be found in Programme, page 30, section "ERS Registry". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

c) Double claims

To avoid double claims under Article 6, ERS has established the following requirements and procedures:

- Project Host Countries must pre-authorise any unit that seeks qualification for authorised uses under Article 6. In the Guidelines for Avoiding Double Claiming, ERS specifies the authorised uses under Article 6 for international mitigation purposes other than Nationally Determined Contributions (NDCs), such as the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). A Letter of Authorisation must be obtained from the Host country's UNFCCC National Focal Point for ERS units to qualify under the authorised uses. To this end, ERS provides specific Letter of Authorisation templates containing all ERS requirements for the Letter to be approved.
- Where a GHG emission removal is achieved within one Host Country's national boundaries and is transferred to another Party for use towards its reduction target, a Corresponding Adjustment is required. These adjustments are needed when authorised use has been granted and "first transfer" conditions are met. Host Countries must report to the UNFCCC and enact the Corresponding Adjustments as mandated. ERS Certification Agents will verify evidence to confirm the effective implementation of these adjustments.
- Developers must provide a mechanism to compensate for double claims of GHG emission removal units. This mechanism is activated if Corresponding Adjustments are not applied or if reliable evidence is not procured within a specified timeframe.
- ERS will publicly disclose necessary evidence of all measures taken to prevent double claiming on the Registry, including annual reports containing aggregated information on carbon credits issuance, designation for eligible offsetting scheme and cancellation.

The proof of this procedure can be found across the whole document Avoiding Double Claiming. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

This procedure is subject to revisions in the next version of the ERS Programme.

- Proposed revisions:
  - ERS will provide a detailed compensation mechanism (in the form of pre-approved insurance), which Developers must subscribe to.
  - More stringent measures to verify the application of the corresponding adjustments. A detailed list of approved documentation demonstrating the implementation of adjustments will be provided (reports to the UNFCCC, entries in the Article 6 database, or an irrevocable electronic certificate from the Host Country). Only then can the unit be used for utilisation by an airplane operator under CORSIA. The ERS Certification Team will be tasked with this verification. The Annual Report will include a section on corresponding adjustments reporting.
- Process: this revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: this revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

PART 4: Carbon Offset Credit Integrity Assessment Criteria

Note—where "evidence" is requested throughout *Part 3* and *Part 4*, the Programme should provide web links to documentation. If that is not possible, then the programme may provide evidence of programme procedures directly in the text boxes provided (by copying/pasting the relevant provisions) and/or by attached supporting documentation, as recommended in "SECTION II: INSTRUCTIONS—*Form Completion*".

Note—"*Paragraph X.X*" in this form refers to corresponding paragraph(s) in Appendix A "*Supplementary Information for Assessment of Emissions Unit Programmes*".

Note—Where the programme has any plans to revise the programme (e.g., its policies, procedures, measures, tracking systems, governance or legal arrangements), including to enhance consistency with a given criterion or guideline, provide the following information in response to any and all relevant form question(s):

- Proposed revision(s);
- Process and proposed timeline to develop and implement the proposed revision(s);
- Process and timeline for external communication and implementation of the revision(s).

Question 4.1 Are additional

Do the Programme's carbon offsets… (*Paragraph 3.1*)	
a) represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate?	☑ YES
b) exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including their availability to the public:

a) Regulatory Surplus

At the Feasibility Study stage of certification: the Developer must demonstrate that there is no enforced legal obligation to restore the Project Area. If such an obligation does exist, the Developer must clarify and prove how this obligation is not enforced. The Developer is required to provide a list of applicable laws and regulations that the Project complies with. Furthermore, ERS encourages Developers to include written descriptions and expert judgments on enforcement. Note that for high-income countries, all legal requirements shall be deemed to be enforced.

The full contents of this procedure can be found in:

- Feasibility Study Report, page 16, Section 1. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/feasibility-study-report-template.pdf.
- M001, page 22 and 25, section "Carbon". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

More details about the certification stages can be found in Programme, page 24, Section Certification Procedures. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

b) Environmental Surplus

In order to demonstrate that ERS carbon offsets exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario, ERS employs two approaches:

- Before Project start, at the Feasibility Study stage of certification:
  - The Project must demonstrate that ecological recovery and consequent GHG emission removal would not have occurred at the same level without the Project's interventions, i.e. in a business-as-usual scenario. This implies demonstrating that the biophysical properties of the land could not allow the ecosystem to regenerate on its own, or at least to the Project's expected restoration level, and thus interventions are necessary. ERS encourages the Developer to provide studies ad/or publications addressign the topic if available.
  - The Developer must also prove that the Project Area was not cleared of existing natural, non-degraded ecosystems to obtain carbon credits revenue. ERS confirms environmental additionality using satellite imagery and assessing land cover degradation in the past ten years preceding the Project origination.
- Throughout the Project's crediting period, ERS employs a dynamic baseline approach allowing for a periodic re-evaluation of the initial baseline scenario to adjust credit issuance. This re-evaluation occurs every two years starting at year four, prior to Verification. This reassessment may lead to adjustments in credit issuance. The process encompasses several steps to ensure the accuracy and relevance of the baseline in reflecting the business-as-usual scenario.

(1) Project Clustering: At the start of the Project, the K-means clustering algorithm is utilised to accurately represent the diverse conditions within the Project Area. This statistical technique stratifies the Project Area into sub-zones. These sub-zones are then used to identify control plots with the same characteristics.

(2) Selection of Control Plots: Control plots are identified outside of the Project Area and the Leakage Belt within ecosystems that share similar characteristics, ensuring they provide a true representation of the business-as-usual scenario. These plots are chosen based on ecological and biophysical attributes, including levels of degradation, and their details, including shapefiles, are made public on the ERS Registry.

(3) Dynamic Evaluation: Before each Verification cycle, ERS reassesses the control plots to ensure their ongoing relevancy. If the plots are no longer representative, new ones are generated.

(4) The mean AGB evolution of all control plots is calculated, leading to two possible scenarios:
  - AGB Growth Scenario: If an upward trend in forest growth is observed, adjustments are made to account for this increase, ensuring the Project does not claim full credit for natural increases in GHG emission removal.
  - AGB Decrease Scenario: If a decline is observed, corrective mechanisms are applied to add the

loss in AGB to the Project's carbon credit issuance.

By systematically evaluating and adjusting the baseline, ERS ensures the integrity of the credit issuance process, reflecting any changes in the Project Area's carbon stock due to natural fluctuations or other factors not attributable to the Project activities.

The full content of this procedure can be found in:

- Feasibility Study Report, page 16, Section 1. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/feasibility-study-report-template.pdf.
- M001, page 22 and 25, section "Carbon". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf
- Quantification Methodology for Terrestrial Forest Restoration, page 19, Section 1. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

Is additionality and baseline-setting… (*Paragraph 3.1*)	
a) assessed by an accredited and independent third-party verification entity?	☑ YES
b) reviewed by the programme?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including their availability to the public:

a) VVB Assessment

Additionality and baseline-setting of all Projects going under ERS certification must be validated by an external Validation & Verification Body (VVB) accredited by the ERS Secretariat. As part of the Validation process, VVBs must analyse:

- The baseline assumptions, models, and quantification methods to confirm their credibility with a reasonable level of assurance, as defined in ISO Standards and their abidance to ERS' methods.
- The additionality of each Project, ensuring that all reported emission removals are indeed additional to the "business as usual" scenario, or the baseline scenario.

VVBs are tasked with establishing the Audit plan and coordinating evidence-collection tasks, in alignment with the ISO 14064-3 and 14065 standards. This process can include interviewing Project proponents, evaluating legal and financial limitations, and carrying out random inspections of data. More details on the Validation process are described in Question 3.6.

This procedure can be found in Validation and Verification Procedure, page 7, Section Validation. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/validation-and-verification-procedure.pdf

b) ERS Assessment

The ERS Programme performs additionnality checks at two disctinct steps:

- At Feasibility, Developers must demonstrate Regulatory and Environmental surplus; the Certification team then evaluates this demonstration, ensuring it aligns with the criteria set forth in the Methodology and is backed by reliable, documented evidence.
- At Assessment, Developers must finalise the demonstration of additionality by conducting both a Barrier Analysis and a Common Practice Analysis; this is also reviewed by the Certification team, ensuring it aligns with the criteria outlined in the Methodology and is backed by reliable, documented evidence.

Importantly, ERS as a standard-setting body is the onus of carbon calculations: ERS carries out the carbon calculations of each Project, at Certification and every two years starting year four.

This procedure is subject to revisions in the next version of the ERS Programme and Methodology:
- Proposed revision: Common Practice demonstration will be done using dynamic baselining. Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: This revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Those procedures can be found in:
- The ERS Programme document page 25, section "Project Feasibility" and page 18, section "Assessment". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf
- The Quantification Methodology for Terrestrial Forest Restoration. his document is publicly available at this weblink: https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

Identify one or more of the methods below that the programme has procedures in place to ensure, and to support activities to analyze and demonstrate, that credited mitigation is additional; which can be applied at the project- and/or programme-level: (*Paragraphs 3.1, and 3.1.2 - 3.1.3*)

- ☑ Barrier analysis
- ☑ Common practice / market penetration analysis
- ☑ Investment, cost, or other financial analysis
- ☐ Performance standards / benchmarks
- ☑ Legal or regulatory additionality analysis (as defined in *Paragraph 3.1*)

Summarize and provide evidence of the policies and procedures referred to in the above list, including describing any/all additionality analyses and test types that are utilized under the programme:

In addition to the procedures described above, namely Regulatory Surplus and Environmental Surplus, the Developer has to demonstrate that credited mitigation is additional using the following procedures, applied at the Project level.
- **Barrier Analysis.** During the Assessment, the Developer must provide an extensive barrier analysis. This entails identifying barriers that would impede the desired Project activities to happen without carbon finance, and illustrating how these obstacles can be effectively addressed. The analysis must include, at a

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minimum, the following types of barriers:

- ○ Financial barriers. These include a lack of funding, high upfront costs, or difficulties accessing finance that can stall or prevent a Project from starting.
- ○ Technical barriers. These include challenges related to technology, methodology, expertise, site-specific conditions, and other technical aspects of the Project. It can involve anything from lack of necessary equipment to difficulties in measuring GHG emission removal.
- ○ Cultural and social barriers. These refer to challenges in the collective movement of local communities towards implementing, maintaining and monitoring restoration projects due to, for example, lack of information, threats to the safety of community members, and existing social structures and norms.
- ○ Regulatory and institutional barriers. These refer to limitations within the regulatory framework and its relevant institution, such as limited staff capacity, lack of necessary skills, local regulations, complex permitting processes, ineffective bureaucratic processes or challenges in meeting specific compliance standards.

For each identified barrier, the Developer must furnish verifiable evidence both for the existence of the barrier and the necessity of carbon finance to overcome it.

- **Common Practice.** ERS verifies whether the Project is a common practice by calculating the cumulative "adoption rate" of natural regeneration and restoration (not financed by carbon crediting schemes) in the Project's region. It involves a five-step process in which the Developer defines the parameters for searching similar projects (Project Area, activities and temporal scale), identifies similar projects that correspond to these parameters, classifies projects found, calculates the Cumulative Adoption Rate and finally compares against the threshold. If the calculated cumulative adoption rate is equal to or below 49%, it indicates that the project type is not common practice in the area. If the adoption rate equals or exceeds 51%, the project activity is common practice and is not additional.

The full content of these two procedures can be found in Additionality Sheet, page 6, Section 1. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/additionality-sheet.pdf

This procedure is subject to revisions in the next version of the ERS Programme & Methodology:

- Proposed revision: Common Practice analysis will be removed from additionality demonstrations.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: This revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

- **Other financial analysis.** During the Feasibility Study phase ERS requires Developers to disclose other sources of financing in the Feasibility Report, section 3, "Potential Project Funder" in which seed funding to cover part of the Project's activities or run pre-submission activities must be included.
  This document is publicly available at this weblink:
  https://docs.ers.org/standard1.0/feasibility-study-report-template.pdf

If the Programme provides for the use of method(s) not listed above, describe the alternative procedures and how they ensure that activities are additional: (*Paragraph 3.1*)

ERS does not provide for the use of methods not listed above.

If the programme designates certain activities as automatically additional (e.g., through a "positive list" of eligible project types), does the programme provide clear evidence on how the activity was determined to be additional? (*Paragraph 3.1*)	☑ YES

Summarize and provide evidence of the policies and procedures for determining the automatic additionality of activities, including a) the criteria used to determine additionality and b) their availability to the public:

ERS has not approved any positive lists for additionality.

Explain how the procedures described under Question 4.1 provide a reasonable assurance that the mitigation would not have occurred in the absence of the offset programme: (*Paragraph 3.1*)

The procedures and requirements that are in place provide reasonable assurance that Projects are additional in the following ways.

At the Project level:
- As detailed in the previous questions, ERS provides a robust set of additionality requirements that meet industry best-practices. Namely,
  - Regulatory Surplus - By scrutinising all applicable legislations and only accepting "not-enforcement" justifications upon legal or scientific evidence and in pre-determine countries.
  - Environmental Surplus - By analysing the last 10 years of the land cover to determine the land-cover-change trend. If assessment shows significant natural regeneration trends the Project is deemed not certifiable.
  - Barrier Analysis - By deeming not certifiable every Project that fails to demonstrate barriers are in place, justifying the need for carbon markets.
- To make ERS' additionality assessment even more stringent, additionality justification is reviewed every four years as part of the "adaptive management approach", and the dynamic baseline re-calculated every two years across the Project's crediting period. All these check points are basis for halting certification or re-calculating credits in case the additionality is reduced or ceases to exist.
- Finally, additionality demonstrations are verified by independent accredited third-party verifiers before Validation and every four years across the Project crediting period.

At the Programme level:
- The ERS Technical Advisory Board rigorously maintains that the criteria for additionality are scientifically established and backed by substantial datasets. Members of the TAB have the ability to suggest revisions

to the approach for demonstrating additionality at any point, following the process set in the Standard Revisions Procedure.

Question 4.2 Are based on a realistic and credible baseline

Are procedures in place to… (*Paragraph 3.2*)	
a) issue emissions units against realistic, defensible, and conservative baseline estimations of emissions?	☑ YES
b) publicly disclose baselines and underlying assumptions?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including how "*conservativeness*" of baselines and underlying assumptions is defined and ensured:

a) Baseline estimations

Baseline estimations and subsequent carbon quantifications are performed by ERS according to the Quantification Methodology for Terrestrial Forest Restoration. The methodology has been through a thorough development process, which included a Public Consultation and validation by the ERS Technical Advisory Board, ensuring alignment with the industry's best practices regarding calculation accuracy and conservativeness.

The baseline scenario is determined through a process that involves a combination of remote sensing and latest scientific advancements to accurately estimate the carbon stored in the Project Area before any intervention. The process comprises the following steps:

(1) Woody/Non-woody Classification: Using remote sensing models, the methodology distinguishes between woody and non-woody areas within the Project boundary. The Project shapefile is transferred to an AGB Provider to obtain a woody/non-woody biomass mask, a raster format map that distinguishes the location and size of woody areas within the Project Area.

(2) Above Ground Biomass (AGB) calculation:
   ○ For Woody Areas: The methodology requires an estimation of the AGB at the pixel level. This is provided by an AGB provider who uses remote sensing data to generate a Woody AGB map, reflecting the estimated AGB in tonnes per pixel.
   ○ For Non-Woody Areas: They are assessed using IPCC or AR-TOOL14 default data. The AGB for these areas is estimated by assigning values based on the land cover classification and the specific ecological zone, following IPCC guidelines for the relevant climate zone.
   ○ Exclusion of Non-reforestable Areas: The methodology requires the exclusion of areas that are not suitable for reforestation from the AGB quantification. Such areas might include infrastructure, water bodies, or any other land covers that are not capable of supporting forest growth.
   ○ ERS consciously excluded SOC, SIC, dead wood, litter and harvested wood products from its calculations. Rationale for exclusion, can be found in the "List of emissions sink" section in the

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(3) Below Ground Biomass (BGB) Estimation: The estimation of BGB, both for woody and non-woody areas, is based on the AGB using root-to-shoot ratios. The methodology follows IPCC guidelines for determining these ratios, which reflect the proportion of biomass below ground relative to above ground.

(4) Calculation of Total Biomass: The total initial carbon stock of the Project Area is the sum of the AGB and BGB estimates for both woody and non-woody areas, excluding the non-reforestable zones.

(5) Conversion to Carbon Dioxide Equivalents: The methodology employs equations from the "AR-TOOL14 A/R Methodological tool" to convert the total biomass into carbon dioxide equivalents. This conversion accounts for the carbon content in the biomass, providing a measurement of the CO_2 sequestration potential of the Project Area at the baseline.

This process ensures that ERS issues emissions units against realistic, defensible, and conservative baseline estimations of emissions. The full content of this procedure can be found in the Quantification Methodology for Terrestrial Forest Restoration, page 7, sections 1-4. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

This procedure is subject to revisions in the next version of the M001 methodology.
- Proposed revision:
  - Region-specific root-to-shoot ratios will be used instead of a standard ratio. Data from the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories will be used.
  - Adding an alternative AGB provider in case Chloris Geospatial fails to provide estimations on time.
- Process: this revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

b) Public availability

The baseline calculations for each Project are summarised in the Project Design Document, which is made publicly available on the Project Registry page at the end of the Assessment phase. The detailed calculations and their underlying assumptions are included in the Appendix 13 - GHG Quantification of the Project Design Document.

Are procedures in place to ensure that *methods of developing baselines*, including modelling, benchmarking or the use of historical data, use assumptions, methodologies, and values do not over-estimate mitigation from an activity? (*Paragraph 3.2.2*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

To ensure that the Quantification Methodology for Terrestrial Forest Restoration do not over-estimate mitigation from Project activities and employ conservative estimates, ERS has implemented the following protocol.

(1) An evaluation of uncertainty in estimates is performed:
- The uncertainty is considered throughout the quantification process, from field measurements to model outputs. This includes all stages from measurements to modelling errors, such as those associated with allometric equations.
- The propagation of uncertainty through these stages must be managed effectively.
- A 95% confidence interval for Above Ground Biomass (AGB) values must be generated to account for this uncertainty.

(2) ERS guarantees maximised conservatism by systematically selecting a conservative uncertainty boundary, which prevents overestimation of GHG emission removals.
- During the baseline quantification, the upper band of the 95% confidence interval is selected for woody AGB values. This overestimates the current state of the restoration site and provides a conservative estimate of the GHG emission removal potential of the Project.
- For the Reference Site quantification, the lower band of the 95% confidence interval is chosen. This underestimates the current state of the Reference Site, providing a conservative estimate of the Project's GHG emission removal potential.
- The GHG emission removal potential is conservatively estimated due to the application of conservative quantifications in the baseline scenario at the Project site and the CO_2 sequestration at the Reference Site.
- During GHG emission removal monitoring, the lower band of the 95% confidence interval is selected, leading to an underestimation of the current sequestration on the restoration site.
- In assessing the impact of reversals, the complete loss of Below Ground Biomass (BGB) is conservatively considered, and the CO2e stock bound to BGB is deducted from the Project issuances.

By applying these conservative measures, the methodology ensures that the quantification of carbon stocks and the estimation of GHG emission removals are responsibly understated to avoid the risk of overcreditation and to maintain the integrity of the carbon credit issuance.

The full content of this procedure can be found in Quantification Methodology for Terrestrial Forest Restoration, page 24, Section Uncertainty & Conservativeness. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

Are procedures in place for activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration? (*Paragraph 3.2.3*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

The procedure has already been described in the answer to the additionality section, Question 4.1. As a reminder, please find below the dynamic baseline procedure.

ERS employs a dynamic baseline approach allowing to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration. This re-evaluation occurs every two years prior to Verification.

This reassessment may lead to adjustments in credit issuance based on the new findings. The process encompasses several steps to ensure the accuracy and relevance of the baseline in reflecting the business-as-usual scenario.

(1) Project Clustering: At the start of the Project, the K-means clustering algorithm is utilised to accurately represent the diverse conditions within the Project Area. This statistical technique stratifies the Project Area into sub-zones. These sub-zones are then used to identify control plots with the same characteristics.

(2) Selection of Control Plots: Control plots are identified outside of the Project Area within ecosystems that share similar characteristics, ensuring they provide a true representation of the business-as-usual scenario. These plots are chosen based on ecological and biophysical attributes, including levels of degradation, and their details, including shapefiles, are made public on the ERS Registry.

(3) Dynamic Evaluation: Before each Verification cycle, ERS reassesses the control plots to ensure their ongoing relevancy. If the plots are no longer representative, new ones are generated.

(4) The mean AGB evolution of all control plots is calculated, leading to two possible scenarios:

   ○ AGB Growth Scenario: If an upward trend in forest growth is observed, adjustments are made to account for this increase, ensuring the Project does not claim full credit for natural increases in GHG emission removal.

   ○ AGB Decrease Scenario: If a decline is observed, corrective mechanisms are applied to add the loss in AGB to the Project's carbon credit issuance.

By systematically evaluating and adjusting the baseline, ERS responds, as appropriate, to changing baseline conditions that were not expected at the time of registration

The full content of this procedure can be found in Quantification Methodology for Terrestrial Forest Restoration, page 19, section 1. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

Question 4.3 Are quantified, monitored, reported, and verified

Are procedures in place to ensure that…	
a) emissions units are based on accurate measurements and valid quantification methods/protocols? (*Paragraph 3.3*)	☑ YES
b) validation occurs prior to or in tandem with verification? (*Paragraph 3.3.2*)	☑ YES
c) the results of validation and verification are made publicly available? (*Paragraph 3.3.2*)	☑ YES
d) monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at *specified intervals* throughout the duration of the crediting period? (*Paragraph 3.3*)	☑ YES

e) mitigation is measured and verified by an accredited and independent third-party verification entity? (*Paragraph 3.3*)	☑ YES
f) *ex-post* verification of mitigation is required in advance of issuance of emissions units? (*Paragraph 3.3*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) through f):

a) Accurate measurements and valid quantification methods

ERS' Quantification Methodology adheres to rigorous accounting and data quality principles to ensure that emissions units are based on accurate measurements and valid quantification protocols.

- Completeness: The methodology includes a rationale for each source of emissions omitted from the Quantification Approach; the methodology also provides justifications for each emission removal included in the calculations.
- Consistency: The process for establishing the baseline scenario and performing carbon quantifications combines remote sensing and the latest scientific developments, ensuring an accurate estimation of the carbon stored in the Project Area prior to intervention. This protocol is uniformly applied by ERS to all Projects, ensuring consistent GHG measurements. This approach also eliminates the inherent conflicts of interest of Developers performing their own carbon quantification.
- Peer-reviewed and science-based development: the ERS quantification methodology development process is designed to ensure that all Projects apply accurate measurement and quantification methods/protocols.
  - Data is sourced from acknowledged providers chosen via the AGB Provider Benchmark. Further details on the Benchmark can be found in Appendix of the Quantification Methodology.
  - Existing methodologies are reviewed annually by the Technical Advisory Board. If evidence shows that specific methodologies lead to overestimation of GHG emission reduction or removals, the use of these methodologies must be suspended or withdrawn, and new ones must be drafted.
  - ERS maintains a dedicated Research and Development (R&D) team with the mandate of drafting new methodologies. This team ensures that methodologies stay aligned with the most up-to-date research, scientific advancements, and technological innovations available. New methodologies are collaboratively developed with the involvement of a group of independent experts, the Technical Advisory Board. They must be approved via the Standard Revision process, as described in Question 3.1.

b) Validation

Validation occurs subsequent to the Project's Assessment and the Public Comment Period. This process is completed within a four-month period after the Assessment. It is followed by the Project's first Verification, which is conducted in the fourth year of the Project's implementation. The primary goal is to examine the Project's Project Design Document (PDD), ensure the accuracy of its data, and confirm its adherence to the ERS Programme and Methodology.

The full content of this procedure can be found in Validation and Verification Procedure, page 11, Section Timeline. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/validation-and-verification-procedure.pdf

c) Results publication

At the conclusion of Validation and Verification audits, the ERS Secretariat is responsible for the submission of the following documents on the Registry:
- Validation/Verification Report: A report summarising the Validation/Verification process and its results.
- Final Project Design Document: The finalised Project design document, including all necessary details and specifications.

The proof of this procedure can be found in Registry Procedures, page 12, Section 3 of "Documentation". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/registry-procedures.pdf

d) MRV schedule

Monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at specified intervals throughout the duration of the crediting period.
- (1) Measuring:
  - Every year the Developer must measure progress on:
    - Ecological recovery according to the methodologies and following indicators defined in the Restoration Plan.
    - Social additionality according to the methodologies and following indicators defined in the Social Additionality Plan.
    - SDGs contribution using the indicators in the SDG Contribution Template.
  - The Developer must also:
    - Disclose the realised expenses in the Project Budget template.
    - Monitor all risks and mitigation actions identified in the Risk Assessment Matrix.
  - Starting at year four, ERS quantifies GHG emission removals of the Restoration Site(s), i.e. the resulting mitigation, using satellite imagery. This quantification is then performed every two years, before Verification.
- (2) Ongoing Monitoring: ERS continuously monitors Project Areas and their Leakage Belts remotely through satellite imagery to track forest cover change and detect loss events.
- (3) Reporting: Following the MRV schedule detailed in the PDD, ERS receives every year from the Developer a complete Annual Report, which consolidates the results of the activities undertaken over the last year. The Certification Team reviews each Annual Report, verifying the Project's progress, cross-referencing evidence, and analysing any deviations from the initial Project design (PDD). The first Annual Report must be submitted twelve months after the Project start. Subsequent Annual Reports are due twelve months after the previous one throughout the crediting period.
- (4) Adaptive Management: The Developer must update the Project Design Document every four years, based on updated assessments of the Project.

The full content of this procedure can be found in the Programme document, page 32, section "MRV Procedures". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf

e) VVB Validation and Verification

Mitigation is measured and verified by an accredited and independent third-party entity, namely a Validation and Verification Body (VVB).

- Before the Project starts, VVBs must validate the carbon quantification.
- Every two years accross Project implementation, starting at year four, VVBs must verify biennial carbon quantification reports from ERS.

For more information on Validation and Verification, please refer to Question 3.6.

The full content of this procedure can be found in Validation and Verification Procedure:

- page 4, Section "General Requirements"
- page 7, Section "Validation"
- page 8, section "Verification"

This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/validation-and-verification-procedure.pdf

f) Ex-post Verification

Ex-post Verification of mitigation is required prior to the issuance of removal units.
Conversion of PRUs to VRUs can only be done on the ERS Registry by the ERS Secretariat following the successful completion of a validation/verification event.

This procedure can be found in Registry Procedures, page 15, section "Conversion". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf

Are provisions in place… (*Paragraph 3.3.3*)	
a) to manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures, and the programme and the activities it supports?	☑ YES
b) requiring accredited third-party(ies) to disclose whether they or any of their family members are dealing in, promoting, or otherwise have a fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated?	☑ YES
c) to address and isolate such conflicts, should they arise?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) through c):

a) VVB conflicts of interest

The ERS Programme has set forth three key policies to avoid conflict of interests between VVBs, ERS and

Developers:

- ERS performs a [Third-Party Screening](#) on VVBs organisation before accreditation.
- ERS directly mandates VVBs to perform Validations and Verifications. This approach eliminates financial dealings between VVBs and Developers, thereby reducing the likelihood of corrupt practices.
- VVBs cannot audit the same project two consecutive times.
- VVBs must sign ERS's Declaration of Interests before entering into a contract with ERS. This comprehensive disclosure covers material transactions, family relationships, or any type of affiliation that could lead to a COI, ensuring transparency and accountability from the outset of any engagement with ERS. This document must be updated by VVBs every four years. Additionally, Third Parties must update ERS on any changes to their situation that may influence an individual's relationship with ERS and its activities.
- ERS oversees the quality of Validation and Verification performed by accredited VVBs. Evaluations of performance take place after the initial Validation/Verification and at a minimum, every two years thereafter. This schedule ensures a continuous and consistent assessment of performance, effectively reducing the risks of conflicts of interest.

The proof of this procedure can be found in

- Validation and Verification Procedure, page 18, Section "Impartiality". This document is publicly available at this weblink:
  https://docs.ers.org/standard1.0/validation-and-verification-procedure.pdf
- Anti-Fraud policy, page 6, section Third Party Due Diligence. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/anti-fraud-policy.pdf

b) Disclosing requirements

See the content of the answer above.

c) Management of conflicts of interest

Any claims and suspicions of COI are immediately investigated and addressed through corrective measures, including, but not limited to:

- Suspension or termination of the business relationship: If violations of ERS' Anti-Fraud rules are discovered, ERS reserves the right to take immediate action such as suspending or terminating the business relationship with the VVB.
- Disciplinary sanctions. Individuals violating ERS' policies or legal obligations may face disciplinary action, as outlined in the Code of Ethics and Business Conduct.
- Corrective action plan. If ERS decides to pursue the business relationship with the VVB, a detailed corrective action plan outlining the actions to address the issue must be developed and implemented. The timeline for implementation will depend on the severity of the non-compliance.
- VVB notification. If a violation is discovered, ERS should undertake to inform other potentially affected VVBs of the issue and the steps taken to resolve it, preserving the integrity and trustworthiness of ERS business relationships.
- Policy reviews. All incidents, non-compliances and grievances will be analysed to determine if systemic issues require adjustments to ERS' policies or procedures.

The full contents of these procedures can be found in the ERS Code of Ethics and Business Conduct: page 23, Violations of the Code. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/code-of-ethics-and-business-conduct.pdf

Are procedures in place requiring that… (*Paragraph 3.3.4*)	
a) the renewal of any activity at the end of its crediting period includes a reevaluation of its baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario?	☑ YES
b) the same procedures apply to activities that wish to undergo verification but have not done so within the programme's allowable number of years between verification events?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including identifying the allowable number of years between verification events:

a) Reevaluations

ERS has set a crediting period of 40 years, equivalent to the Project's duration. This timeframe is founded on the requirement that Developers must undertake adaptive management practices. For more details, please refer to Question 3.3, section e).

As for the reevaluation of baselines, ERS applies a dynamic baseline procedure. A dynamic baseline evaluation consists of a periodic re-evaluation of the initial baseline scenario to adjust credit issuance. The dynamic baseline process is performed every two years, prior to Verification; the full procedure is described in the previous question and publicly available at this weblink:
https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf (pages 19-22).

b) Validation/Verification delays

If the Project Area becomes inaccessible for VVBs to perform Verification as scheduled, the Verification can be delayed up to twelve months. Pass this period the Project must be placed on hold. If VVB availability cannot be secured for Verification within the period stipulated in the Validation and Verification Procedures, the information must be publicly disclosed in the Registry.

The proof of this procedure can be found in the Programme: page 35, section "Delays". This document is publicly available at this weblink:https://docs.ers.org/standard1.0/programme.pdf

This procedure is subject to revisions in the next version of the Programme (V1.1):
- Proposed revision: Expand the permissible grounds for the twelve-month delay allowance beyond physical inaccessibility to include other factors, such as political context, force majeure, or other reasons deemed justifiable by the VVB.
- Process: this revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Are procedures in place to transparently identify units that are issued *ex ante* and thus ineligible for use in the CORSIA? (*Paragraph 3.3.5*)	☑ YES

Provide evidence of the policies and procedures referred to above:

ERS issues two categories of Units: Projected Restoration Units (PRUs) and Verified Restoration Units (VRUs). Only VRUs are comparable to *ex post* carbon credits, representing the independently verified removal of $1tCO_2e$ (one metric ton of carbon dioxide equivalent) from the atmosphere. The distinction between PRUs and VRUs is defined as follows:

- Projected Restoration Units (PRUs)
  - Concept: PRUs represent future sequestration and should not be considered carbon credits. While they may resemble *ex ante* credits in some aspects, they cannot be classified as *ex-ante* credits due to the inability to retire them. From a Developer's perspective, PRUs are a tangible asset to secure upfront funding for their Project. From a Buyer's perspective, PRUs are utilised as a tangible asset to ensure the ownership of carbon credits (VRUs) in the future.
  - Measurement: To calculate PRUs, ERS estimates the total Project sequestration potential according to the [Quantification Methodology for Terrestrial Forest Restoration](#). Each PRU represents a tCO2e that is expected to be sequestered during the Project's crediting period; PRUs are thus intended to be converted into VRUs during the crediting period.
- Verified Restoration Units (VRUs)
  - Concept: VRUs represent an independently-verified sequestration of 1tCO2e from the atmosphere. They are categorised into vintages according to the year when the sequestration occurred. VRUs are considered ex-post carbon credits and can be retired.
  - Measurement: VRU conversion is based on the net GHG benefit achieved during a Verification cycle (time between two Verifications). It is determined by comparing the biomass status at Verification cycle t, with the biomass status at Verification cycle t–1. The detailed calculation of VRUs can be found in the Quantification Methodology for Terrestrial Forest Restoration.

The Registry will distinctly showcase the difference between PRUs and VRUs.
- All units within the ERS Registry are assigned a unique serial number with the following format: ERS-[project type]-[project id]-[countrycode]-[unit type]-[issuance date or vintage]-[batch]-[block start]-[block end].
- Units meeting the eligibility requirements for ICAO's CORSIA, ICROA, and IC-VCM are labelled as such. PRUs will not be labelled with CORSIA as they are not considered as carbon credits.

The full contents of these procedurse can be found in:
- The ERS Programme, section "Units", page 39. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/programme.pdf
- Registry Procedures, section "Serialisation" and "Labelling", pages 22-23. This document is publicly available at this weblink:

https://docs.ers.org/standard1.0/registry-procedures.pdf

Question 4.4 <u>Have a clear and transparent chain of custody</u>

SECTION III, Part 3.4—Identification and tracking includes questions related to this criterion. No additional information is requested here.

Question 4.5 <u>Represent permanent emissions reductions</u>

List all emissions sectors (if possible, activity types) supported by the Programme that present a potential risk of reversal of emissions reductions, avoidance, or carbon sequestration:

All project types that claim offset credits from carbon sequestration (in vegetation or soil) inherently have a risk of reversal; this is the case for all Projects certified by ERS under the Methodology For Terrestrial Forest Restoration.

What is the minimum scale of reversal for which the Programme provisions or measures require a response? (Quantify if possible)

ERS does not set any minimum scale of reversal for which a response is required.

This procedure is subject to revisions in the next version of the ERS Programme:
- Proposed revision: Any loss events affecting an area larger than 1 hectare within the Restoration Site must be reported and addressed in accordance with the Reversal procedure outlined in the Programme.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: This revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

For sectors/activity types identified in the first question in this section, are procedures and measures in place to require and support these activities to…	
a) undertake a risk assessment that accounts for, *inter alia*, any potential causes, relative scale, and relative likelihood of reversals? (*Paragraph 3.5.2*)	☑ YES
b) monitor identified risks of reversals? (*Paragraph 3.5.3*)	☑ YES
c) mitigate identified risks of reversals? (*Paragraph 3.5.3*)	☑ YES
d) ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA? (*Paragraph 3.5.4*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) through d):

a) Risk Assessment

ERS has developed a specific tool to undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals and other risks: the Risk Assesssment Matrix.

A hundred and twenty-four pre-identified risks are outlined in the Risk Assessment Matrix, which also allows additional risks to be included by the Developer on a per-project basis. All risks are analysed based on their likelihood of happening and the severity of their consequences, i.e. relative scale. This analysis is grounded in a comprehensive review of the Project documentation supplied by the Developer, data gathered from desktop research, and empirical observations derived from Validations and Verifications.

Risks derive from the following categories:
- Risk of failure to deliver - Delivery Risk. This includes all risks threatening the Developer's capacity to deliver the Project.
- Risk of avoidable and unavoidable reversal - Reversal Risk. This includes all risks that pose a reversal threat once restoration is already done.
- Risk of non-compliance with an ERS Requirement - ERS Requirements Risk. This includes all risks threatening the Project's compliance with an ERS Requirement.
- Blockers. This includes all risks that need to be fully mitigated before the Project can be certified.

Risk Assessment and evaluation are performed using the Risk Assessment Matrix before Validation, and is updated every four years.

The full risk evaluation methodology is provided in detail in the Risk Assessment Matrix. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/risk-assessment-matrix-template.xlsx

b) Risk Monitoring

All risks with Likelihood and Severity evaluations rated 1 or higher must be monitored. ERS will define the monitoring schedule of each mitigation and surveillance plan at its discretion and will disclose them in the PDD.

This procedure can be found in the Methodology for Terrestrial Restoration, section "Risk Monitoring", page 45. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

c) Risk Mitigation

If risks are identified, ERS notifies the Developer who must provide mitigation and surveillance plans, where required. The Developer is responsible for indicating directly in the Risk Assessment Matrix:
- The surveillance and mitigation plans;
- Indicators and methodologies for monitoring.

ERS will review the plan and approve it, or request corrective actions (CARs) or clarifications (CRs). In cases where mitigation is necessary, a new risk evaluation is issued based on its effectiveness. The same procedure is

applied at Validation and Verification by VVBs.

Details on this procedure can be found in the Methodology for Terrestrial Restoration, section "Mitigation and Surveillance Plans", page 45. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

d) Compensation

ERS ensures full compensation for reversals of mitigation issued as emissions units. To this regard, ERS has set up a Buffer Pool as a mitigation mechanism to ensure the integrity of Restoration Units and to compensate for potential reversals happening during the crediting period. The Buffer Pool is an insurance pool common to all ERS-certified Projects. Twenty per cent (20%) of every Project Unit issuance is allocated to ERS' Buffer Pool. These Units can never be sold; they are held in a dedicated account on the ERS Registry and administered by the ERS Secretariat. Information on the Buffer Pool supply, including the origin of Restoration Units (e.g., activity type and vintage), is publicly available in the ERS Registry.

The cancellation procedure is summarised below (please note that the concepts and full procedure will be detailed in the following section):

(1) Loss Events Quantification. ERS quantifies Loss Events annually; at Verification, ERS determines if the impact of loss events resulted in Reversal or not. If Reversal is confirmed, their nature - avoidable or unavoidable - is established pro-rata to the loss events.

(2) VVB Verification. An accredited VVB presents the ERS Secretariat with a Verification Report. If the Verification confirms the Reversal accounting, the Secretariat will proceed to cancellation.

(3) Notification. The Developer associated with the affected VRUs is notified by ERS of the upcoming cancellation event, and if it has been considered as 'avoidable' or 'unavoidable'.

(4) Cancellation. The ERS Secretariat must cancel VRUs in the Buffer Pool in an amount equal to the net carbon dioxide equivalent loss during the Verification cycle as full compensation for the Reversal.

(5) Unit Replacement (if applicable). If the Reversal has been qualified as avoidable, the Developer must deposit VRUs issued by the Project or other ERS-certified Projects in the Buffer Pool in an amount equal to the net carbon dioxide equivalent loss of the Verification cycle.

The full details of this procedure can be found in the Registry Procedure, section "Cancellation", page 16. This document is publicly available at this weblink: https://docs.ers.org/standard1.0/registry-procedures.pdf

Regarding the specific double-claiming compensation mechanism for units used toward offsetting obligations under the CORSIA, please refer to the Question 4.7 referring to Paragraph 3.7.13.

Are provisions in place that… (*Paragraph 3.5.5*)	
a) confer liability on the activity proponent to monitor, mitigate, and respond to reversals in a manner mandated in the programme procedures?	☑ YES
b) require activity proponents, upon being made aware of a material reversal event, to notify	☑ YES

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the programme within a specified number of days?	
c) confer responsibility to the programme to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in the programme procedures?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) through c), including indicating the *number of days within which activity proponents must notify the programme of a material reversal event*:

a) Reversals monitoring, mitigation and answer

Monitoring, mitigation and response to reversals are clearly defined in the Programme as follows:
- Monitoring of Reversals: ERS annually tracks loss events using a satellite imagery-based tool. Additionally, Developers are required to continuously monitor such events.
- Reversals mitigation: in the Risk Assessment Matrix, Developers must account for, inter alia, any potential causes, relative scale, and relative likelihood of reversals. If risks are identified, ERS notifies the Developer who must provide mitigation and surveillance plans, where required. The Developer is responsible for indicating directly in the Risk Assessment Matrix:
  - The surveillance and mitigation plans;
  - Indicators and methodologies for monitoring.
- Reversals response: see the answers below (b & c)

Details on these procedures can be found:
- The ERS Programme, section "Reversal Procedure", page 45. This document is publicly available at this weblink:
  https://docs.ers.org/standard1.0/programme.pdf
- The Methodology for Terrestrial Restoration: page 45, section "Mitigation and Surveillance Plans". This document is publicly available at this weblink:
  https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

b) Reversals notification

If the Developer or ERS identify a loss event, they must notify each other within thirty calendar days. Developers will be asked to provide:
- The description and date of the loss event;
- A shapefile delimiting the loss event's total area and location;
- The nature of the loss event - avoidable or unavoidable, and documentation to back up such claim;
- The confirmed and expected impacts on Project activities.

Any loss events notified must be reported annually in the Annual Report.

This procedure can be found in the ERS Programme document, section "Reversal Procedure", page 45. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/programme.pdf

c) Reversals compensation

Upon loss event notification, the following procedure is executed:

(1) Quantification of Impacts: ERS quantifies loss events' impact before the biennial Verification.

(2) Loss events characterisation: ERS will deduct the total GHG emissions of loss events from the Project's total GHG removals in that cycle. Balance will result in either:

○ Reversal: When the impact of the loss event(s) led to a net GHG emission. The nature of the Reversal stems for the nature of the underlying loss event(s) on a pro-rata basis.

○ Underperformance: When the impact of the loss event(s) led to a net GHG removal, but lower than projected.

(3) Verification: Loss events are verified every two years during Verification, upon which the following is verified:

○ Quantification of loss events;

○ Nature of loss events (avoidable or unavoidable);

○ The accounting of GHG emissions and removals.

(4) Buffer Pool Compensation:

○ For Avoidable Reversals: the Secretariat cancels VRUs in the Buffer Pool equal to the net loss. The Developer must deposit an equivalent amount of VRUs into the Buffer Pool. The Secretariat will not convert any PRUs for the given Verification period.

○ For Unavoidable Reversals: the ERS Secretariat cancels VRUs in the Buffer Pool equal to the net loss. The ERS Secretariat will not convert any PRUs for the given Verification period.

○ If the cancelled VRUs exceed the Project's net contribution to the Buffer Pool, additional VRUs from the Buffer Pool are cancelled. In this scenario, the additional VRUs should be issued under the same ERS Programme and Methodology versions.

The detailed content of this procedure can be found in the ERS Programme document, section "Reversal Procedure", page 45. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/programme.pdf

Does the programme have the capability to ensure that any emissions units which compensate for the material reversal of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA are fully eligible for use under the CORSIA? (*Paragraph 3.5.6*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

The ERS Registry is designed to specify the type of Project and the vintage of all credits used for offsetting and contributions to the Buffer Pool. This allows ERS to verify that all credits used for reversal compensation in ICAO-eligible Projects are tagged as CORSIA. This means that these credits meet the ICAO EUC standards in terms of project type, vintage, and other established criteria.

The detailed content of this procedure can be found in the ERS Programme document, section "Compensation",

page 48. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/programme.pdf

Would the programme be willing and able, upon request, to demonstrate that its permanence provisions can fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA? (*Paragraph 3.5.7*)	☑ YES

Question 4.6 <u>Assess and mitigate against potential increase in emissions elsewhere</u>

List all emissions sectors (if possible, activity types) supported by the programme that present a potential risk of material emissions leakage:

ERS has one methodology available for use, <u>Methodology for Terrestrial Forest Restoration</u>, which supports terrestrial forest ecosystem restoration activities. This activity type is subject to potential material emissions leakage.

Are measures in place to assess and mitigate incidences of material leakage of emissions that may result from the implementation of an offset project or programme? (*Paragraph 3.6*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

ERS has comprehensive procedures in place to ensure that Projects assess and mitigate material leakage of emissions. ERS methodology M001 accounts for activity shifting leakage only.
The procedure to identify and mitigate leakage is as follows:

(1) Activity and Stakeholder Mapping: before Project implementation, the Developer must identify land-use activities that will be displaced due to the Project's interventions and inform them in the Leakage Mitigation Template. The Developer must consult local stakeholders and decide to either maintain or shift the activities causing leakage.

(2) Mitigation Plan: the Developer must establish a mitigation plan to minimise the scale and impact of activity-shifting using the Leakage Mitigation Template. The mitigation plan must include mitigation objectives and interventions. The interventions of the mitigation plan will then be detailed in the Social Additionality Plan.

(3) Leakage Zonation: The Developer must indicate in the Project shapefile the total area of the displaced activity, the zones that will be displaced, and the location of the Leakage Area.

Details regarding these procedures can be found in:

- The Methodology for Terrestrial Forest Restoration: page 27, section "Leakage". This document is

publicly available at this weblink:
https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

- The Leakage Mitigation Template. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/leakage-mitigation-declaration-template.xlsx

This procedure is subject to revisions in the next version of the ERS Programme & Methodology:

- Proposed revision: To clarify the process, modifications will be applied to Activity Mapping, including the integration of the Leakage Zonation. The new procedure to identify and mitigate leakage is as follows:

  (1) Activity Mapping: Before Project initiation, Developers must identify activities within the Project Area that could lead to displacement and impact the surrounding tree biomass. This consists of running the livelihoods community consultation and determining the activities that will be shifted and their land surface area using the ERS apps. In this regard, Developers must choose one of the two options:

      (a) Option 1: the percentage of the activity that will be displaced during the crediting period and inform it using the ERS app, OR

      (b) Option 2: the precise area where the activity will be displaced using the ERS app.

  In addition, Developers must provide details regarding the reinstalment of the activity, including the justification of the percentage of displacement.

- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.

- Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Are provisions in place requiring activities that pose a risk of leakage when implemented at the project level to be implemented at a national level, or on an interim basis on a subnational level, in order to mitigate the risk of leakage? (*Paragraph 3.6.2*)	☐ YES

Summarize and provide evidence of the policies and procedures referred to above:

ERS Projects are typically implemented within a boundary smaller than the national level or sub-national level. The M001 methodology intrinsically encompasses strategies, as previously mentioned, to appropriately assess leakage for the Project's boundary and accordingly adjust emissions. If a Project happens to go beyond national borders, ERS requires two different Projects to be submited, one for each country, and both individually following the leakage protocol as described in the question above.

The proof of this requirement can be found in the M001: page 7, section "Registration", item 4.4. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf

Are procedures in place requiring and supporting activities to monitor identified leakage?	☑ YES

(*Paragraph 3.6.3*)	

Summarize and provide evidence of the policies and procedures referred to above:

Continuous monitoring is conducted by ERS and aims to identify and address leakage emissions throughout the entire duration of the Project. Leakage monitoring involves the integration of field data and satellite imagery within a 5-kilometer radius of the Project Area, defined as the Leakage Belt. In cases where detected leakage is demonstrated to have a direct connection to the Project activities, Developers must implement a mitigation plan. Additionally, Leakage emissions are calculated following the Quantification Methodology for Terrestrial Forest Restoration before Verification.

This procedure can be found in the ERS Programme document, page 28, section "Monitoring". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/programme.pdf

This procedure is subject to revisions in the next version of the ERS Programme and Methodology:
- Proposed revision: To clarify the leakage monitoring process and its implications, ERS will update the process as follows:
  - Continuous monitoring is conducted by ERS and aims at identifying and addressing leakage emissions throughout the entire duration of the Project.
  - Between Validation and the first Verification, Developers report annually on the Leakage Mitigation interventions defined in the Social Additionality Plan. If the Developer modifies the location or extent of an Activity Displacement Area, changes must be declared in the Project Annual Report.
  - After the first Verification, the land cover is monitored annually within a five-kilometre-wide transitional or boundary zone along the Project's perimeter, called the Leakage Belt. Land cover changes in the Leakage Belt equal or superior to one hectare will be notified to the Developer. The Developer must then justify to ERS whether the change is linked to the Project activities. In case the justification is not satisfactory, ERS reserves the right to send a VVB on the ground. If the change in land cover is confirmed to be linked to the Project's activities, the Developer must establish a mitigation plan using the Leakage Mitigation Template.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Are procedures in place requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities? (*Paragraph 3.6.4*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

ERS proceeds to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities:

(1) Before implementing the Project, ERS uses data provided by the Developer in the Identification process (see above in Activity Mapping) to gauge the location and extent of displacements of every activity. ERS assesses the average tree biomass stock in the area anticipated to host the displaced activities, in a 5-km radius around the Project boundary, termed the Leakage Belt. The aim is to determine the total leakage emissions, which are then subtracted from the Project's estimated greenhouse gas (GHG) benefits. Detailed calculations can be found in the "Initial Leakage Quantification" section in the Quantification Methodology for Terrestrial Forest Restoration.

(2) Upon the completion of the first four-year period and the implementation of the leakage mitigation plan, Developers are required to update the location and extent of every activity displacement. ERS uses satellite imagery to confirm if the Leakage Area(s) - location(s) and extent - match the Developer's declaration. ERS will update the quantification and obtain the revised leakage emissions, which will be discounted from the Project's GHG benefits.

These procedures can be found in:

- the Methodology for Terrestrial Forest Restoration: page 29, section "Leakage correction". This document is publicly available at this weblink:
  https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf
- The Quantification Methodology for Terrestrial Forest Restoration: page 17, section "Emissions". This document is publicly available at this weblink:
  https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

This procedure is subject to revisions in the next version of the Methodology for Terrestrial Forest Restoration and Quantification Methodology for Terrestrial Forest Restoration:

- Proposed revision: Data informed by Developers during the Identification stage will be subject to revisions. In the next version of the Methodology, Developers must choose one of the two options:
  ○ Option 1: the percentage of the activity that will be displaced during the crediting period and inform it in the ERS app, OR
  ○ Option 2: the precise area where the activity will be displaced using the ERS app.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: Upon receiving approval from the TAB, the revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Question 4.7 Are only counted once towards a mitigation obligation

Does the Programme have measures in place for the following…	
a) to ensure the transparent transfer of units between registries; and that only one unit is issued for one tonne of mitigation *(Paragraphs 3.7.1 and 3.7.5)*	☑ YES

b) to ensure that one unit is issued or transferred to, or owned or cancelled by, only one entity at any given time? *(Paragraphs 3.7.2 and 3.7.6)*	☑ YES
c) to discourage and prohibit the double-selling of units, which occurs when one or more entities sell the same unit more than once? *(Paragraph 3.7.7)*	☑ YES
d) to require and demonstrate that host countries of emissions reduction activities agree to account for any offset units issued as a result of those activities such that double claiming does not occur between the airline and the host country of the emissions reduction activity? *(Paragraph 3.7.3)*	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) through d):

a) Transparent transfers and unicity
- VRUs are registered in the ERS Registry and cannot be transferred to other registries.
- VRUs represent a unique and verified removal of 1tCO2e from the atmosphere, i.e. one tonne of mitigation. They are issued following a successful Verification, certifying that the carbon removal calculations have been independently verified by a VVB.

More details on this procedure can be found in the ERS Programme, page 41, section "Verified Restoration Units". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/programme.pdf

b) Double use
To avoid double use, the ERS Registry specifically incorporates the following features:
- Transparent management of the issuance, transfer, retirement and cancellation of Restoration Units (RUs). The ERS Registry offers four distinct roles, each with specific permissions and responsibilities. These roles are built into the technical specificities of our Registry and cannot be bypassed. Only associates of the Secretariat are authorised to perform the issuance, cancellation, and conversion of Restoration Units, ensuring that one unit is issued to only one entity at any given time.
- Serialisation and labelling of units so that each RU is associated with one specific serial number, Project, country, issuance block and vintage.
- A unit can only be owned by one account at a time within the ERS Registry.
- Public disclosure of all of the Project's documentation and geographical coordinates in the form of shapefiles.

Refer to Question 3.4 and Annex D for more details on the management of Restoration Units on the ERS Registry.

The proof of this procedure can be found in:
- the Registry Procedures, page 6, section "Roles and Permissions in the Registry". This document is publicly available at this weblink:
  https://docs.ers.org/standard1.0/registry-procedures.pdf
- The ERS Programme, page 30, Section ERS Registry. This document is publicly available at this weblink:
  https://docs.ers.org/standard1.0/programme.pdf

c) Double-selling

ERS has implemented specific measures to prevent double-selling.

- The ERS Registry System is designed to ensure that a VRU cannot be listed in more than one Registry account, effectively preventing the possibility of double-selling the unit.
- When a VRU is retired or canceled, it is definitively removed from circulation in the market and becomes ineligible for sale (or transfer) to another Registry account. Account Holders on the Registry are required to retire Restoration Units on behalf of a specific Legal Entity or Individual, ensuring that the retirement is attributed to the rightful owner.

The proof of this procedure can be found in the Registry Procedures: page 19, section "Retirement". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/registry-procedures.pdf

d) Double claiming

ERS requires that host countries of emissions reduction activities agree to account for offset units issued as a result of those activities and tagged as CORSIA such that double claiming does not occur between the airline and the host country of the emissions reduction activity.

In this regard, Project Host Countries must:

- Grant authorisation for the utilisation of carbon credits by the beneficiary and assure that they will report the usage of these credits to the UNFCCC and make the necessary Corresponding Adjustments.
- Define the first transfer conditions.
- Report to the UNFCCC and enact the Corresponding Adjustments as mandated by the UNFCCC.

ERS must actively seek evidence to confirm and ensure the effective implementation of pledged Corresponding Adjustments. If no Corresponding Adjustments have been made or justified, ERS requires the activation of the compensation mechanism from the Developer (see below for more details on the mechanism).

The proof of this procedure can be found in the Avoiding Double Claiming Guidelines, page 3, section "General Principles". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

This procedure is subject to revisions in the next version of the Avoiding Double Claiming Guidelines, part of Programme V1.1:

- Proposed revisions: More details will be provided for detailing how ERS verifies evidence of the application of the corresponding adjustments. Documentation demonstrating the implementation of adjustments will need to be provided to the ERS Certification team. This can be in the form of reports to the UNFCCC, entries in the Article 6 database, or other methods (such as an irrevocable electronic certificate) from the Host Country. These documents must confirm that the necessary adjustments have been made within the relevant accounting system. Only then can the unit be used by an airplane operator under CORSIA. The Annual Report will include a section on corresponding adjustments reporting.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process

described in Question 3.1.
- Timeline: This revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Does the Programme have procedures in place for the following: (*Paragraph 3.7.8*)	
a) to obtain, or require activity proponents to obtain and provide to the programme, written attestation from the host country's national focal point or focal point's designee?	☑ YES
b) for the attestation(s) to specify, and describe any steps taken, to prevent mitigation associated with units used by operators under CORSIA from also being claimed toward a host country's national mitigation target(s) / pledge(s)?	☑ YES
c) for Host country attestations to be obtained and made publicly available prior to the use of units from the host country in the CORSIA?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) through c):

a) Host Country Authorisation
A Letter of Authorisation must be obtained by Developers from the country's UNFCCC National Focal Point for ERS Credits to qualify under the authorised uses:
- International mitigation purposes other than NDCs. This refers to uses outlined in international treaties other than the Paris Agreement, such as the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).
- Other purposes. This refers to all potential other purposes, including use towards voluntary emissions pledges in the context of the voluntary carbon market.

More details on this procedure can be found in the Avoiding Double Claiming Guidelines, page 3, section "Host Country Authorisation". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

b) Authorisation content
For the Letter of Authorisation to be approved by ERS, the UNFCCC National Focal Point must explicitly:
- Identify the specific Project and activity, and acknowledge that the Project enhances removals in the country;
- Acknowledge that ERS has issued, or intends to issue, carbon credits for a stated volume in CO_2e emission removals within the country;
- Authorise and report the use of the Project's GHG emission removals, issued as carbon credits, by aeroplane operators and/or by voluntary market buyers towards climate targets to meet offsetting requirements;
- Declare that the country will not use the Project's associated GHG emission removals to track progress towards, or to demonstrate achievement of its NDC. They will account for their use by aeroplane operators and/or by voluntary market buyers towards climate targets by applying relevant Corresponding Adjustments in the country's biennial transparency reports;

- Define "first transfer" in terms of when a Corresponding Adjustment will be applied for other international mitigation purposes (authorisation, issuance, or the use or cancellation of the mitigation outcome, as specified by the participating Party);
- Include a request to ERS to provide information to the country on using the carbon credits.

ERS provides a specific template that gathers all these requirements. This ensures the attestation prevents mitigation associated with units used by operators under CORSIA from being claimed toward a host country's national mitigation target(s) / pledge(s).

The proof of this procedure can be found in the Avoiding Double Claiming Guidelines: page 4, section "Host Country Authorisation". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

The Letter of Authorisation templates are publicly available at these links:
https://docs.ers.org/standard1.0/letter-of-authorisation-for-corsia-template.pdf
https://docs.ers.org/standard1.0/letter-of-authorisation-for-article-6-template.pdf

c) Authorisation publication
ERS will publicly disclose all Letters of Authorisation that have been approved on the ERS Registry.

This procedure can be found in the Avoiding Double Claiming Guidelines, page 4, section "Host Country Authorisation". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

Does the Programme have procedures in place requiring… (*Paragraph 3.7.9*)	
a) that activities take approach(es) described in (any or all of) these sub-paragraphs to prevent double-claiming?	☑ YES
☑ Emissions units are created where mitigation is not also counted toward national target(s) pledge(s) / mitigation contributions / mitigation commitments. (*Paragraph 3.7.9.1*)	
☑ Mitigation from emissions units used by operators under the CORSIA is appropriately accounted for by the host country when claiming achievement of its target(s) / pledges(s) / mitigation contributions / mitigation commitments, in line with the relevant and applicable international provisions. (Paragraph 3.7.9.2)	
☐ Programme procedures provide for the use of method(s) to avoid double-claiming which are not listed above (*Paragraph 3.7.9.3*)	
b) that Host Country attestations confirm the use of approach(es) referred to in the list above?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

a) Double claiming

ERS has developed a set of guidelines, the Avoiding Double Claiming guidelines, to allow Developers to formally request to ERS that their offset credits be qualified for meeting offsetting requirements under the CORSIA mechanism. Developers are required to provide the necessary information and ERS will ensure full compliance with the requirements established in the guidelines document and ensure the accuracy of the information provided.

To demonstrate that emissions units are generated in cases where mitigation is not simultaneously accounted for in national target pledges or mitigation contributions/commitments:

- Developers must obtain a Letter of Authorisation from the Host Country, including all the requirements enunciated in the Avoiding Double Claiming guidelines, and submit it to the ERS Secretariat for review. In this Letter, Host Countries must grant authorisation for the utilisation of carbon credits by the beneficiary, assure that they will report the usage of these credits to the UNFCCC and make the necessary Corresponding Adjustments. They also shall define the first transfer conditions and report to the UNFCCC and enact the Corresponding Adjustments as mandated by the UNFCCC.
- ERS must report on issuance, designation for eligible offsetting schemes, and cancellation. ERS must actively seek evidence to confirm and ensure pledged Corresponding Adjustments are effectively implemented. If no Corresponding Adjustments have been made or justified, ERS requires the Developer's activation of the compensation mechanism.
- Specifically in the context of CORSIA, ERS will report on the quantity of CORSIA-eligible carbon credits issued per country, in the calendar year, the quantity of CORSIA-eligible carbon credits cancelled by aeroplane operator for each CORSIA compliance period, and the maximum number of GHG emission removals from ERS Projects authorised by countries for use by other countries or entities, per country and calendar year.

These requirements and procedures ensure that the host country appropriately accounts for mitigation from emissions units used by operators under the CORSIA when claiming achievement of its target(s)/pledges(s)/mitigation contributions/mitigation commitments, in line with the relevant and applicable international provisions.

The full content of this procedure can be found in the Avoiding Double Claiming Guidelines. This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

b) Confirmation

The mandatory content of the Letter of Authorisation required from Host Countries serves to confirm the implementation of the approaches outlined in section a).

The proof of this procedure can be found in the Avoiding Double Claiming Guidelines, page 4, section "Host Country Authorisation". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

Does the Programme… (*Paragraph 3.7.10*)	
a) make publicly available any national government decisions related to accounting for units used in ICAO, including the contents of host country attestations described in paragraph 3.7.8?	☑ YES
b) update information pertaining to host country attestation as often as necessary to avoid double-claiming?	☑ YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

a) Public availability

ERS publicly discloses all Letters of Authorisation that have been approved on the ERS Registry.

The proof of this procedure can be found in the Avoiding Double Claiming Guidelines: page 4, section "Host Country Authorisation". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

b) Updates

As described in the previous questions, ERS will report annually on CORSIA-eligible carbon credits cancelled by aeroplane operator for each CORSIA compliance period. Reports will be publicly available on the Registry and forwarded to the relevant organisation (e.g. ICAO) as well as to all nations linked with the GHG emission reductions and/or removals. ERS does not specify any update requirements regarding the Letter of Authorisations.

The proof of this procedure can be found in the Avoiding Double Claiming Guidelines: page 5, section "Reporting". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

Does the Programme have procedures in place to compare countries' accounting for emissions units in national emissions reports against the volumes of eligible units issued by the programme and used under the CORSIA which the host country's national reporting focal point or designee otherwise attested to its intention to not double claim? (*Paragraph 3.7.11*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

ERS proactively collects evidence to verify the correct implementation of Corresponding Adjustments by a Host Country. This evidence is obtained from the Host Country's biennial transparency reports submitted to the United Nations Framework Convention on Climate Change (UNFCCC). The reports clearly reference the carbon credits (e.g., using unique identifiers or serial numbers or a specific reference to the authorisation letter) for which the country has applied the Corresponding Adjustments. After obtaining the necessary evidence, ERS will

publicly disclose it on the Registry.

ERS also has CORSIA-specific reporting requirements. Reported information includes:
- Quantity of CORSIA-eligible carbon credits issued per country, in the calendar year;
- Quantity of CORSIA-eligible carbon credits cancelled by aeroplane operator for each CORSIA compliance period;
- The maximum number of GHG emission removals from ERS Projects authorised by countries for use by other countries or entities, per country and calendar year.

The proof of this procedure can be found in the Avoiding Double Claiming Guidelines, page 5, section "Reporting". This document is publicly available at this weblink:
https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

This procedure is subject to revisions in the next version of the ERS Programme:
- Proposed revision: Reports will be published on the ERS website by the Secretariat.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: This revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Does the Programme have procedures in place for the programme, or proponents of the activities it supports, to compensate for, replace, or otherwise reconcile double claimed mitigation associated with units used under the CORSIA which the host country's national accounting focal point or designee otherwise attested to its intention to not double claim? (*Paragraph 3.7.13*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

Developers must provide a mechanism to compensate for double claims of GHG emission removal units between claiming organisations and Host Countries that attested to their intention to not double claim towards NDC achievement. The mechanism must be used in two situations:
- A Corresponding Adjustment is not made within a year of when the adjustment was expected to be made to the UNFCCC by the Host Country;
- A Corresponding Adjustment is made but reliable evidence is not procured within a year of when the adjustment was expected to be reported to the UNFCCC by the Host Country.

The mechanism must guarantee that any double-claimed units for which a Corresponding Adjustment has not been made will be replaced with a volume of eligible credits corresponding to the number of units double-claimed by the Host Country. These units must be ERS units, or comparable eligible units approved by ERS, that have not been sold or otherwise committed.

The proof of this procedure can be found in the Avoiding Double Claiming Guidelines, page 6, section "Remedy for Double Claims". This document is publicly available at this weblink: https://docs.ers.org/standard1.0/avoiding-double-claiming-guidelines.pdf

This procedure is subject to revisions in the next version of the ERS Programme.

- Proposed revisions: ERS will provide more information regarding the compensation mechanisms that Developers must subscribe to.
    - Under the current procedure's compensation mechanism, which addresses the replacement of units subject to double claiming, Developers will be specifically required to secure pre-approved insurances, namely Kita or MIGA, prior to qualifying their units (VRUs) with the CORSIA label.
    - In the next version of the procedure, the compensation mechanism can also take the form of a guarantee, provided by a pre-approved insurance, that any double-claimed units will be reimbursed. The mechanism must cover all costs incurred in acquiring substitute units for the units claimed twice. ERS will be responsible for acquiring such substitute units. These units must either be ERS units or similar units eligible under CORSIA, as authorised by ERS, and should not have been previously sold or allocated.
- Process: This revision is subject to the Standard Revision Procedure and will adhere to the process described in Question 3.1.
- Timeline: This revision will be incorporated into the forthcoming version of the Standard, scheduled for release by the second quarter of 2024.

Would the Programme be willing and able, upon request, to report to ICAO's relevant bodies, as requested, performance information related to, *inter alia*, any material instances of and programme responses to country-level double claiming; the nature of, and any changes to, the the number, scale, and/or scope of host country attestations; any relevant changes to related programme measures? (*Paragraph 3.7.12*)	☑ YES

Question 4.8 Do no net harm

Are procedures in place to ensure that offset projects do not violate local, state/provincial, national or international regulations or obligations? (*Paragraph 3.8*)	☑ YES

Summarize and provide evidence of the policies and procedures referred to above:

Please refer to the answer provided in Question 3.9.

Describe, and provide evidence that demonstrates, how the programme complies with social and environmental safeguards: (*Paragraph 3.8*)

Please refer to the answer provided in Question 3.9

Describe, and provide evidence of the programme's public disclosure of, the institutions, processes, and procedures that are used to implement, monitor, and enforce safeguards to identify, assess and manage environmental and social risks: (*Paragraph 3.8*)

Please refer to the answer provided in Question 3.9

PART 5: Programme comments

Are there any additional comments the programme wishes to make to support the information provided in this form?

Click or tap here to enter text.

SECTION IV: SIGNATURE

I certify that I am the administrator or authorized representative ("Programme Representative") of the emissions unit programme ("Programme") represented in a) this form, b) evidence accompanying this form, and c) any subsequent oral and/or written correspondence (a-c: "Programme Submission") between the Programme and ICAO; and that I am duly authorized to represent the Programme in all matters related to ICAO's analysis of this application form; and that ICAO will be promptly informed of any changes to the contact person(s) or contact information listed in this form.

As the Programme Representative, I certify that all information in this form is true, accurate, and complete to the best of my knowledge.

As the Programme Representative, I acknowledge that:

the Programme's participation in the assessment does not guarantee, equate to, or prejudge future decisions by Council regarding CORSIA-eligible emissions units; and

the ICAO is not responsible for and shall not be liable for any losses, damages, liabilities, or expenses that the Programme may incur arising from or associated with its voluntary participation in the assessment; and

as a condition of participating in the assessment, the Programme will not at any point publicly disseminate, communicate, or otherwise disclose the nature, content, or status of communications between the Programme and ICAO, and of the assessment process generally, unless the Programme has received prior notice from the ICAO Secretariat that such information has been and/or can be publicly disclosed.

Signed:

Priscille Raynaud
_____
Full name of Programme Representative (*Print*)

3/1/2024
_____
Date signed (*Print*)

DocuSigned by:

Priscille Raynaud
93E582B61DA64B6...
_____
    Programme Representative (*Signature*)

(This signature page may be printed, signed, scanned and submitted as a separate file attachment)

Programme Application Form, Appendix B

Programme Assessment Scope

CONTENTS: With this document, programmes may define which of their activities they
are submitting for assessment by the TAB. The two sheets are described below:

Sheet A)   Activities the programme describes in this form, which will be assessed by ICAO's TAB
Sheet B)   List of all methodologies / protocols that support activities described under Sheet A

SHEET A: DESCRIBED ACTIVITIES *(Here, list activities supported by the programme that are described in this form for further assessment)*

Sector	Supported activity type(s)	Implementation level(s)	Geography(ies)
Forestry and Land Use	Terrestrial forest restoration	Project-level	The Project must be situated in inland forest landscapes between latitudes 51.6° N and 51.6° S and located in 'Tropical-subtropical forests' (T1), 'Temperate-boreal forests' (T2), Trophic Savannas (T4.1) and Temperate Woodlands (T4.4) biomes following the IUCN classification.

SHEET B: METHODOLOGIES / PROTOCOLS LIST *(Here, list all methodologies / protocols that support activities described in Sheet A)*

Methodology name	Unique Methodology / Protocol Identifier	Applicable methodology version(s)	Date of entry into force of most recent version	Prior versions of the methodology that are credited by the Programme (if applicable)	Greenhouse / other gases addressed in methodology	Web link to methodology
Methodology for Terrestrial Forest Restoration	M001	V1 and upcoming V1.1	14/11/2023	N/A	C02 Regarding carbon credits issued, only VRUs are submitted for assessment by the ICAO TAB. PRUs are not included.	https://docs.ers.org/standard1.0/m001-methodology-for-terrestrial-forest-restoration.pdf https://docs.ers.org/standard1.0/m001-quantification-methodology-for-terrestrial-forests.pdf

Programme Application Form, Appendix C

Programme Exclusions Scope

CONTENTS: With this document, programmes may define which of their activities they
are **excluding** from TAB's assessment.The two sheets are described below:

Sheet A)   Activities the programme describes in this form will be **excluded** from assessment by ICAO's TAB
Sheet B)   List of all methodologies / protocols that support activities described under Sheet A

SHEET A: EXCLUDED ACTIVITIES *(Here, list activities supported by the programme that are **excluded** from further assessment))*

Sector	Project/programme type(s)	Implementation level(s)	Geography(ies)
Forestry and Land Use	Reforestation	Project-level	Global

SHEET B: EXCLUDED METHODOLOGIES *(Here, list all methodologies / protocols that support activities described in Sheet A)*

Methodology name	Unique Methodology / Protocol Identifier	Applicable methodology version(s)	Date of entry into force of most recent version	Prior versions of the methodology that are credited by the Programme *(if applicable)*	Greenhouse / other gases addressed in methodology	Web link to methodology
Methodology for Reforestation	M000	V1	01/03/2022	N/A	C02	https://docs.ers.org/standard0.9/M000-methodology-for-reforestation.pdf https://docs.ers.org/standard0.9/M000-quantification-methodology-for-reforestation.pdf

Emissions Unit Programme Registry Attestation

(Version 3, January 2023)

PART A. Applicability and Instructions

1. Relevance and definitions:

   1.1. These terms are relevant to emissions unit programmes and their designated registries:

      1.1.1. *CORSIA Eligible Emissions Unit Programme:* emissions unit programme approved by the ICAO Council as eligible to supply emissions units under the CORSIA.

      1.1.2. *CORSIA Eligible Emissions Unit Programme-designated registry:* registry designated by a CORSIA Eligible Emissions Unit Programme to provide its registry services and approved by the ICAO Council as reflected in the programme's listing contained in the ICAO Document titled "*CORSIA Eligible Emissions Units*".

      1.1.3. *Material change:* any update to the procedures of an emissions unit programme or its designated registry that would alter the functions that are addressed in the Emissions Unit Criteria (EUC), related guidelines, or the contents of this attestation. This includes changes that would alter responses to questions in the application form that the programme has submitted to the ICAO Secretariat or contradict the confirmation of the registry's adherence to the requirements contained in this attestation.

      1.1.4. *Cancel:* the permanent removal and single use of a CORSIA Eligible Emissions Unit within a CORSIA Eligible Emissions Unit Programme designated registry such that the same emissions unit may not be used more than once. This is sometimes also referred to as "retirement", "cancelled", "cancelling" or "cancellation".

      1.1.5. *Business day:* defined by the CORSIA Eligible Emissions Unit Programme registry when responding to formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units.

   1.2. References to "Annex 16, Volume IV" throughout this document refer to Annex 16 to the Convention on International Civil Aviation — *Environmental Protection,* Volume IV — *Carbon Offsetting and reduction Scheme for International Aviation (CORSIA)*, containing the Standards and Recommended Practices (SARPs) for CORSIA implementation. Reference to "ETM, Volume IV" throughout this document refer to Environmental Technical Manual (Doc 9501), Volume IV — *Procedures for demonstrating compliance with the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)*, containing the guidance on the process to implement CORSIA SARPs.

2. Programme - registry relationship:

   2.1. The ICAO Council's Technical Advisory Body (TAB) conducts its assessment of emissions unit programme eligibility including an assessment of the programme's provisions and procedures governing the programme registry, as represented by the programme. The ICAO Council determines CORSIA eligible emissions units upon recommendations by TAB and

consistent with the EUC. The programme registry is not separately or independently considered throughout this process. The TAB may periodically review and report to the ICAO Council regarding the continued consistency of programme's registry and its administration with terms contained in this document's Part B.

2.2.   The provision of registry services under the CORSIA by a CORSIA Eligible Emissions Unit Programme registry is fully subject to the terms, conditions and limitations to the programme's scope of eligibility. Such terms include, *inter alia*, the programme's commitment to administer any and all provisions and procedures governing the programme registry in the manner represented by the programme in the application form and additional information provided to TAB during the assessment process.

2.3.   A CORSIA Eligible Emissions Unit Programme registry can provide registry services to aeroplane operators prior to the programme's and programme registry's demonstration of the registry's consistency with the registry requirements contained in this attestation. However, the programme registry can only claim to support and can only provide for aeroplane operators to fulfill the provisions in Annex 16, Volume IV and ETM, Volume IV involving emissions unit cancellation-, reporting-, and verification-related actions after its consistency with the registry requirements contained in this attestation is demonstrated by the programme in accordance with Part A, Paragraph 3 of this document, and the signed attestation is published on the CORSIA website in addition to the ICAO document "*CORSIA Eligible Emissions Units*".

3.   Submitting an "*Emissions Unit Programme Registry Attestation*":

3.1.   Both the administrator or authorized representative ("Programme Representative") of an emissions unit programme ("Programme"), and the administrator or authorized representative ("Registry Representative") of the registry designated by the Programme ("Programme Registry") will review and attest to their acceptance (as signed in Section 8 of this attestation) of all terms contained herein.

3.2.   The Programme will electronically submit to the ICAO Secretariat a unique, dual-signed attestation for each and every Programme Registry that will provide its registry services to the Programme under the CORSIA:

3.2.1. If the Programme is determined to be eligible by a decision of the ICAO Council taken in 2020, the Programme will submit the signed attestation(s) to the ICAO Secretariat no later than one year after the Programme is determined to be eligible by the ICAO Council.

3.2.2. From 2021, the Programme should submit the signed attestation(s) to the ICAO Secretariat at the time of applying for assessment by the TAB. If the Programme is determined to be eligible by a decision of the ICAO Council after 31 December 2020, the Programme will submit the signed attestation(s) to the ICAO Secretariat no later than 180 days after the Programme is determined to be eligible by the ICAO Council.

3.3.   As soon as possible upon receiving a signed attestation from the Programme, the ICAO

Secretariat will:

3.3.1. Forward the signed attestation to the TAB; and

3.3.2. If the Programme is determined to be eligible by a decision of the ICAO Council, publicly post the signed attestation on the CORSIA website in addition to the ICAO document "*CORSIA Eligible Emissions Units*".

PART B: Emissions Unit Programme Registry Attestation

4. **Programme application materials**. As the Registry Representative, I certify items 4.1 to 4.4:

   4.1.   I have read and fully comprehend the following information:

       4.1.1. The instructions and terms of this attestation;

       4.1.2. The contents of the ICAO document "*CORSIA Emissions Unit Eligibility Criteria*";

       4.1.3. The contents of the most recent version of the application form that the Programme has provided to the ICAO Secretariat; and

       4.1.4. The terms, conditions and limitations to the Programme's scope of eligibility and further action(s) requested to the Programme by the ICAO Council, as presented to the Programme upon relevant decision of the ICAO Council on the Programme's eligibility[1] for the 2024-2026 compliance period (First Phase).

   4.2.   The Programme's representation of its provisions and procedures governing the Programme Registry, and of Programme Registry functionality, as contained in the most recent version of the application form that the Programme has provided to the ICAO Secretariat, is true, accurate, and complete, to the best of my knowledge;

   4.3.   The Programme Registry will notify the Programme of any material changes to the Programme Registry, to enable the Programme to maintain consistency with relevant criteria and guidelines throughout its assessment by TAB and up to an eligibility decision by the ICAO Council; and, if applicable, continuing on from the effective date of an affirmative eligibility decision by the ICAO Council, the Programme Registry will notify the Programme of any material changes to the Programme Registry, such that the Programme can maintain consistency with relevant criteria and guidelines;

   4.4.   The Programme Registry and Registry Representative will not publicly disseminate, communicate, or otherwise disclose the nature, content, or status of communications between the Programme, the Programme Registry, and/or the ICAO Secretariat, related to the status of the Programme's provision of programme and registry services under the CORSIA, unless the Programme has received prior notice from the ICAO Secretariat that such information has been and/or can be publicly disclosed.

5. **Scope of Programme responsibilities under the CORSIA**. As the Registry Representative, I acknowledge items 5.1 to 5.2:

   5.1.   The scope of the Programme assessment by the TAB, through which the TAB will develop recommendations on the list of eligible emissions unit programmes (and potentially project types) for use under the CORSIA, which will then be considered by the ICAO Council for an eligibility decision, including the Programme's responsibilities throughout this process; and

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[1] Only applicable when the Programme submits the signed "*Emissions Unit Programme Registry Attestation*" to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

5.2. The scope and limitations of the ICAO Secretariat's responsibilities related to the assessment process.

6. **Programme - Registry relationship**. As the Registry Representative, I understand and accept items 6.1 to 6.2:

    6.1. The Programme Registry's provision of registry services under the CORSIA is subject to the terms, conditions and limitations to the Programme's scope of eligibility, as presented to the Programme upon relevant decision of the ICAO Council on the Programme's eligibility; and

    6.2. Only after the Programme and the ICAO Secretariat have completed all steps in Part A, Section 3 of this attestation, can the Programme Registry facilitate and identify emissions unit cancellations specifically for CORSIA use, and support any related reporting and verification activities. The Programme Registry will not promote itself as being capable of providing registry services for the described purpose until such time.

7. **Scope of Programme Registry responsibilities under the CORSIA**. As the Registry Representative, I certify items 7.1 to 7.12:

    7.1. The Programme Registry is capable of fully meeting the objectives of any and all Programme provisions and procedures related to the Programme Registry that the Programme is required to have in place:

        7.1.1. In the manner represented by the Programme in the application form that the Programme has provided to the ICAO Secretariat; and

        7.1.2. As acknowledged by the Programme in the signed "Programme acceptance to terms of eligibility for inclusion in the ICAO document "*CORSIA Eligible Emissions Units*"[2].

    7.2. The Programme Registry will not deny a CORSIA participant's request for a registry account solely on the basis of the country in which the requestor is headquartered or based;

    7.3. The Programme Registry will identify (in the case of applicants to be assessed to determine their eligibility) / identifies (when the Programme is determined to be eligible by a decision of the ICAO Council) CORSIA Eligible Emissions Units as defined in the ICAO document "*CORSIA Eligible Emissions Units*"[3]. This will be/is done consistent with the capabilities described by the Programme in its communications with ICAO, and any further requirements decided by the ICAO Council for CORSIA Eligible Emissions Unit Programme-designated Registry.

    7.4. The Programme Registry will, upon request of the CORSIA participant account holder or participant's designee, designate the participant's cancellation of emissions units for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle;

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[2] Only applicable when the Programme submits the signed "*Emissions Unit Programme Registry Attestation*" to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

[3] As prescribed in the ICAO Document *"CORSIA Eligible Emissions Units",* the programme must provide for and implement its registry system to identify its CORSIA eligible emissions units as defined in the document.

7.5. The Programme Registry will, within 1 – 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units within the registry, and barring system downtime that is scheduled in advance or beyond the control of the registry administrator, make visible on the Programme Registry's public website the account owners cancellations of CORSIA Eligible Emission Units as instructed. Such cancellation information will include all fields that are specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV;

7.6. The Programme Registry will, upon request of the CORSIA participant account holder or participant's designee, generate report(s) containing the information specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV;

7.7. The Programme Registry will maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants' designees, and transaction events carried out by a user; and disclose documentation of such practices upon request. The Programme Registry will utilize appropriate method(s) to authenticate the identity of each user accessing an account; grant each user access only to the information and functions that a user is entitled to; and utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user. Such security features will meet and be periodically updated in accordance with industry best practice;

7.8. The Programme Registry will, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant's designee, notify the CORSIA participant account holder or their designee, and notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme's application form;

7.9. The Programme Registry will ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV, and ETM, Volume IV. Without prejudice to the aforementioned, such requirement would not prevent a Programme Registry from utilizing secure, time-bound and auditable methods for correcting unintentional user-entry errors;

7.10. The Programme Registry will ensure that all cancellation information on its website is presented in a user-friendly format; is available at no cost and with no credentials required; is capable of being searched based on data fields; and can be downloaded in a machine-readable format, e.g., .xlsx;

7.11. The Programme Registry will retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations on an ongoing basis and for at least three years beyond the end date of the latest compliance period in which the emissions unit programme is determined to be eligible; and consistent with the Programme's long-term planning, including plans for possible dissolution;

7.12. The Programme Registry will append a document to the end of the signed attestation describing how it will ensure its ability to implement the requirements of this document. This will include references to existing registry functionalities that already meet the

requirements of this document and/or description of business practices and procedures that ensure the Programme Registry's ability to implement the requirements in this document prior to identifying any emissions unit cancellations specifically for CORSIA use and supporting any related reporting and verification activities.

8. **Accuracy and completeness of information.** The signatures below certify that the information provided is true and correct in all material respects on the date as of which such information is dated or certified and does not omit any material fact necessary in order to make such information not misleading. Representatives are duly authorized for official correspondence on behalf of their organization.

DocuSigned by:

Priscille Raynaud
93E582B61DA64B6...
_____
Programme Representative Signature

Priscille Raynaud
_____
Programme Representative Name

ERS
_____
Programme Name

3/1/2024
_____
Date

DocuSigned by:

Priscille Raynaud
93E582B61DA64B6...
_____
Registry Representative Signature

Priscille Raynaud
_____
Registry Representative Name

ERS Registry
_____
Registry Name

3/1/2024
_____
Date

Instructions for Registry Representative: Please append a document on the next page of this attestation describing your Registry's ability to implement the requirements of this document, including references to existing registry functionalities that meet the requirements of this document and/or description of business practices and procedures that ensure the Programme Registry's ability to implement the requirements of this document prior to identifying any emissions unit cancellations specifically for CORSIA use and supporting any related reporting and verification activities.

ATTACHMENT A: PROGRAMME REGISTRY ATTESTATION DISCLOSURE FORM

PART 1: INSTRUCTIONS FOR REGISTRY REPRESENTATIVE

The following information request corresponds to the registry representative's certification of its adherence to items 7.1 to 7.11 of the *Emissions Unit Programme Registry Attestation* "Scope of Programme Registry responsibilities under the CORSIA".

In accordance with item 7.12 of the *Emissions Unit Programme Registry Attestation,* registry administrators are to complete and append this form to the signed *Attestation* describing how the Registry will ensure its ability to implement the requirements of the *Attestation*. This includes references to existing registry functionalities that already meet the requirements of the *Attestation* and/or descriptions of business practices and procedures that ensure the Programme Registry's ability to implement the requirements in the *Attestation*.

For further guidance regarding the format and approaches for providing summary information and evidence of system functionalities and/or procedures in this form, refer to instructions for "**Form Completion**" in the *Application Form for Emissions Unit Programmes*[4].

PART 2: PROGRAMME AND REGISTRY REPRESENTATIVE INFORMATION

1. Programme Representative Information

A. Programme Information

Programme name: ERS

Administering Organization[5]: ERS - The Ecosystem Restoration Standard

Official mailing address: 25 Rue Frémicourt, 75015, Paris, France

Telephone #:   +33 7 7 68 86 29 89

Official web address: https://www.ers.org/

B. Programme Administrator Information (i.e., individual contact person)

Full name and title: Priscille Raynaud, Managing Director

Employer / Company (*if not programme*): ERS - The Ecosystem Restoration Standard

E-mail address: p.raynaud@ers.org   Telephone #: +33 7 7 68 86 29 89

C. Programme Representative Information (if different from Programme Administrator)

Full name and title: Click or tap here to enter text.

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[4] https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx

[5] **Please complete**, even if the name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme is the same as *"Programme Name"*.

Employer / Company (*if not Programme*): Click or tap here to enter text.

E-mail address: Click or tap here to enter text.   Telephone #: Click or tap here to enter text.

2. Registry Representative Information[6]

A. Registry Information

Registry / system name: ERS Registry (hosted by APX)

Administering Organization: ERS - The Ecosystem Restoration Standard

Official mailing address: 25 Rue Frémicourt, 75015, Paris, France

Telephone #:   +33 7 7 68 86 29 89

Official web address: https://www.ers.org/registry

B. Registry Administrator Information (i.e., individual contact person)

Full name and title: Priscille Raynaud, Managing Director

Employer / Company (*if not Registry Administering Organization*): ERS - The Ecosystem Restoration Standard

E-mail address: p.raynaud@ers.org   Telephone #: +33 7 7 68 86 29 89

Please note that the Programme Administrator is currently acting as Director of Secretariat and is therefore also responsible for registry administration. The Director of Secretariat is currently being recruited.

C. Programme Representative Information (if different from Registry Administrator)

Full name and title: Click or tap here to enter text.

Employer / Company (*if not Registry Administering Organization*): Click or tap here to enter text.

E-mail address: Click or tap here to enter text.   Telephone #: Click or tap here to enter text.

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[6] **Please complete this section**, even if the business, government agency, organization, or other entity that administers the Emissions Unit Programme Registry is the same as the organization described in **Part 2. "*1. Programme Representative Information*"**.

PART 3: EVIDENCE OF ADHERENCE TO SCOPE OF REGISTRY RESPONSIBILITIES

7.1	Does the Programme Registry fully meet the objectives of any and all Programme provisions and procedures related to the Programme Registry that the Programme is required to have in place in the manner represented by the Programme in the application form that the Programme has provided to the ICAO Secretariat and, if applicable[7], as acknowledged by the Programme in the signed "Programme acceptance to terms of eligibility for inclusion in the ICAO document "*CORSIA Eligible Emissions Units*"?	☑ YES
	Describe how the Registry ensures its ability to implement these provisions:	
	A registry already exists, but a new registry is currently under development. The new registry is being developed and will be hosted by APX. Registry specifications that will be attached to this application at the time of submission (Registry Requirements document) outline the features currently being developed by APX to meet CORSIA's expectations. Additionally, the new registry is scheduled to go live by the end of April 2024, with the option for testing and review available by mid-March 2024 if necessary.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.	
	Our current registry is available at this weblink: www.ers.org/registry. The specification of the new registry (hosted and developed by APX) will be attached to the application at the time of submission.	

7.2	Will the Programme Registry ensure that a CORSIA participant's request for a registry account will not be denied solely on the basis of the country in which the requestor is headquartered or based?	☑ YES
	Describe how the Registry does or will implement this provision:	
	A KYC/AML procedure is required before opening an account on the ERS Registry. If the country where the participants is headquartered is subject to sanctions imposed by the European Union or the United States of America, this might affect the account creation approval. Please refer to the question 3.4 in the Application Form.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.	

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[7] Only applicable when the Programme submits the signed "*Emissions Unit Programme Registry Attestation*" to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

7.3	Will the Programme Registry (in the case of applicants to be assessed to determine their eligibility)/Does the Programme Registry (when the Programme is determined to be eligible by a decision of the ICAO Council) identify / label its CORSIA eligible emissions units as defined in the ICAO Document "*CORSIA Eligible Emissions Units*"?	☑ YES

Describe how the Registry does or will implement this provision:

The emissions units meeting the criteria outlined in the ICAO document will be identified using a labelling system outlined in the implemented requirements (Section 7 of the "Registry Requirement" document that will be attached to this application). These labels will be publicly visible in the reports available on the ERS Registry once hosted by APX. Here is an extract of the requirement submitted to APX:

- Units AND projects can be labelled using tags or a labelling system
- This can be done retroactively
- New labels/tags can be added at any time.
- These labels will be used to inform the user about various attributes of the project or the unit like:
  - CCP attributes (ICVCM): CCP-approved, Host country authorisation pursuant to Article 6 of the Paris Agreement, Share of Proceeds for Adaptation, Quantified positive SDG impacts…
  - ICROA, CORSIA attributes
  - Corresponding Adjustment
  - Article 6.4 compliant
  - …
- New labels can be added easily
- These labels must appear in reports

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation.*
Section 7 of the "ERS Registry Requirement" document that will be attached to this application; Section 5 for the definitions of reports, including the presence of Labels as displayed data.

7.4	Will the Programme Registry, upon request of the CORSIA participant account holder or participant's designee, designate the participant's cancellation of emissions units for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle?	☑ YES

Describe how the Registry does or will implement these provisions:

As described in Section 4.6 of the ERS Registry Requirement, the owner of the units must disclose on behalf of which entity they are retiring units, and for what purpose (which is a mandatory field). All unit retirement information must be made available on the registry. Units may also be cancelled by the Secretariat upon request.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's

	implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.	
	Related sections of the ERS Registry Requirement: - Cancellation (by Secretariat, in case of reversal): section 4.3 - Retirement (cancellation by account holders): section 4.6 - Unit report with cancellation/retirement reason: section 5.7	

7.5	a. Will the Programme Registry, within 1 – 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units within the registry, and barring system downtime that is scheduled in advance or beyond the control of the registry administrator, make visible on the Programme Registry's public website the account owner's cancellations of CORSIA Eligible Emission Units as instructed.	☑ YES
	b. Will such cancellation information (row a) include all fields that are specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV?	☑ YES
	Describe how the Registry does or will implement these provisions:	
	Any Account Holder can retire (cancel) units they own by indicating the reason for the retirement and specifying for which entity the units are being cancelled. These details are publicly displayed in the report "Retirements" immediately after the cancellation. The name of the aeroplane operator retiring the credit will be indicated in a free text, and will appear as well in the reports.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.	
	Retirement (cancellation by account holders): section 4.6 of the ERS Registry Requirement Retirement report: section 5.7 of the ERS Registry Requirement	

7.6	Will the Programme Registry, upon request of the CORSIA participant account holder or participant's designee, generate report(s) containing the information specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV?	☑ YES
	Describe how the Registry does or will implement this provision:	
	All reports of the ERS registry can be downloaded as a CSV file. The Retirement report contains the following data that can be extracted and downloaded as a CSV: 1. Account Name 2. Account ID 3. Project Name 4. Project ID 5. Project Type	

	6. Methodology
	7. Program Version
	8. Vintage
	9. Serial Number
	10. Quantity
	11. Retirement Date
	12. Retirement Reason
	13. Beneficial Owner
	14. Labels
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation.*
	Section 5.7 of the ERS Registry Requirement

7.7	a. Does the Programme Registry maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants' designees, and transaction events carried out by a user?	☑ YES
	b. Does the Programme Registry disclose documentation of such practices (row a) upon request?	☑ YES
	c. Does the Programme Registry utilize appropriate method(s) to authenticate the identity of each user accessing an account?	☑ YES
	d. Does the Programme Registry grant each user access only to the information and functions that a user is entitled to?	☑ YES
	e. Does the Programme Registry utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user?	☑ YES
	f. Do such security features (rows a – e) meet and undergo periodic updates in accordance with industry best practice?	☑ YES
	Describe how the Registry implements each provision in rows a – f:	
	The ERS registry is being developed and hosted by APX, the leading registry in the market. APX is SOC 2 compliant, ensuring best practices in terms of security, integrity, and data management. Here is an extract of the contract with APX about the security:	
	"Description of the technical and organisational measures implemented by the data importer(s) (including any relevant certifications) to ensure an appropriate level of security, taking into account	

	the nature, scope, context and purpose of the processing, and the risks for the rights and freedoms of natural persons. • Processor has a SOC2 certification, which is audited at least every two years • Each sub-processor has a SOC2 certification or equivalent audit, which the Processor reviews on a periodic basis • Personal data is encrypted via built-in encryption provided by the sub-processors • Personal data is encrypted in transit • Data storage facilities provided by sub-processors are either continuously backed up with point-in time restores or capabilities to institute backups provided to APX/Xpansiv, and APX/Xpansiv ensures that those capabilities are utilized to ensure that backups are present in all cases • Disaster recovery programs are required by Sub-Processors • Access logs are maintained by Sub-Processors and access is restricted on an 'as needed' basis. Quarterly access and permission reviews are carried out and any remediation actions identified are tracked and implemented in a timely manner. • Multiple non-Production environments are utilized for development, testing, user acceptance testing, and staging of software prior to deployment to production. • QA testing is used prior to any software developments being released to production."
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation.*
	Attached to the submission is the Appendix II of the contract describing the various processes in place to ensure the security of the ERS registry.

7.8	a. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant's designee, notify the CORSIA participant account holder or their designee?	☑ YES
	b. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant's designee, notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme's application form?	☑ YES
	Describe how the Registry does or will implement each provision in rows a and b:	
	The contract signed by ERS with APX defines a Data Processing Agreement which describes the process in case of Data Breach: "The Processor shall notify ERS of any personal data breach not later than 48 hours after having become aware of it by email to dpo@ers.org. This notification contains the following information to the extent available at the time of notification:	

- Description of the nature of the personal data breach including the categories and approximate number of persons affected by the breach, categories and approximate number of personal data records;

- Description of the likely consequences of the personal data breach;

- Description of the measures to be implemented to remedy the personal data breach including, where applicable, measures to mitigate any consequences;

- The name and contact details of the data protection officer or other point of contact from which further information can be obtained.

Other information must be provided as and when it becomes available, without undue delay.

The Processor undertakes to immediately remedy the personal data breach and undertakes to actively collaborate with ERS in order to take the necessary actions to correct any dysfunction that may be at the origin or a consequence of the personal data breach, and to prevent any breach from happening again.

The Processor refrains from disclosing any information relating to a personal data breach, except such disclosure results from a legal or regulatory obligation or has been authorized by ERS."

Following that procedure, ERS is informed for any breach detected by APX. ERS is then responsible to notify all impacted account holders by email and the ICAO Secretariat.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation.*

Attached to the submission is an extract of the APX and ERS contract with the "EXHIBIT C - DATA PROCESSING AGREEMENT" that describes the data processing agreement in place.

7.9	Does the Programme Registry ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV, and ETM, Volume IV[8]?	☑ YES
	Describe how the Registry implements these provisions:	
	When a unit is cancelled, a reason must be indicated (required field). This reason is publicly disclosed. This action is irreversible.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation.*	
	Section 4.6 of the ERS Registry Requirement	

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[8] Without prejudice to the aforementioned, such requirement would not prevent a Programme Registry from utilizing secure, time-bound and auditable methods for correcting unintentional user-entry errors.

	a. Does the Programme Registry ensure that all cancellation information on its website is presented in a user-friendly format?	☑ YES
	b. Does the Programme Registry ensure that all cancellation information on its website is available at no cost and with no credentials required?	☑ YES
	c. Does the Programme Registry ensure that all cancellation information on its website is capable of being searched based on data fields?	☑ YES
	d. Does the Programme Registry ensure that all cancellation information on its website can be downloaded in a machine-readable format, e.g., .xlsx?	☑ YES
7.10	Describe how the Registry implements each provision in rows a – d:	
	All cancellation information is visible in the Retirement report directly in the ERS Registry, presented in a clean and comprehensive table format. This report is publicly accessible at no cost and does not require credentials. It can be downloaded as a CSV file. All the data displayed in the reports can be filtered by adding constraints on columns.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation.*	
	Section 5 of the ERS Registry Requirement that describes the Report feature.	

	a. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations on an ongoing basis and for at least three years beyond the end date of the latest compliance period in which the emissions unit programme is determined to be eligible?	☑ YES
	b. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations consistent with the Programme's long-term planning, including plans for possible dissolution?	☑ YES
	Describe how the Registry does or will implement each provision in rows a and b:	
7.11	Yes, data is conserved in the ERS Registry without expiration date.	
	In case of dissolution, all CORSIA eligible units will be transferred to another Programme and Registry. For more information on plans for dissolution, refer to question 3.7 of the Application Form.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation.*	
	Long-term Administration Plan: https://docs.ers.org/standard1.0/ers-administration-plan.pdf	