CORSIA Eligible Emissions Unit Programme Change Notification Form

Version 2.0; Effective from 10 January 2022

PART A: ABOUT THIS FORM

Once an emissions unit programme is approved by the ICAO Council as eligible to supply CORSIA Eligible Emissions Units, the programme commits to notify the ICAO Secretariat of any "material changes" to its "Scope of Eligibility", *including any unilateral decision to revoke or invalidate a class of CORSIA- eligible emission units within the programme's Scope of Eligibility*, for further review¹ by the Technical Advisory Body (TAB) that advises the ICAO Council on the eligibility of emissions units for use in CORSIA.

*TAB Procedures*² defines a "Material Change" as an update to a programme's *Scope of Eligibility* that would alter the programme's response(s) to any questions in its application form and further inquiries from the TAB over the course of the programme's assessment, including programme-initiated unit invalidation and/or revocation. (paragraph 7.3.).

TAB Procedures defines a CORSIA Eligible Emissions Unit Programme's *Scope of Eligibility* as "the extent and limits of a programme's eligibility, which is defined, assessed, and granted on the basis of the programme-level governance structures, measures or mechanisms, and procedures that programmes have in place at the time of their initial submission of application materials to the ICAO Secretariat; and any updates to these procedures that are communicated to TAB during the course of its assessment; and as defined in the general or programme-specific eligibility parameters set out in TAB's recommendations" (paragraph 4.5).

Annually, TAB will indicate deadlines for programmes to notify ICAO of any such material changes. These notifications should be submitted by the next deadline after the material change has occurred; the upcoming deadlines are indicated in the version of the *TAB Work Programme and Timeline* document that is currently effective. This document is available on the CORSIA website³.

Material changes should be disclosed using this form. TAB will then consider the need for any further review, in line with *TAB Procedures*. If TAB identifies that the change is indeed material and should be further assessed, it will invite public comments on the consistency of the proposed revision with the Emissions Unit Criteria (EUC) and *Guidelines for Criteria Interpretation*. The ICAO Secretariat will inform the programme of TAB's decision to more deeply assess the programme's modification, or its confirmation that the modification is consistent with the CORSIA EUC. The programme will also be informed of the date by which the review will be completed. The length of the review should be determined by the severity and scale of the material change.

PART B: PROGRAM CHANGE NOTIFICATION(S)

¹ Any unilateral programme-initiated invalidation and/or revocation of a class of CORSIA-eligible emissions units is considered to be a "material change" to the CORSIA-eligible programme's *Scope of Eligibility*. Such units are regarded as immediately ineligible for use for CORSIA purposes in light of absence of assurance that it will administer the units consistent with its *Terms of Eligibility*. The units will be reflected as exclusions from the programme's *Scope of Eligibility* in the ICAO Document "CORSIA Eligible Emissions Units" upon Council's confirmation of the update. Once a programme notifies ICAO that it wishes to exclude a class of units from its eligibility scope, and in order to provide the most accurate and timely information available prior to Council's confirmation of the update, the ICAO Document "CORSIA Eligible Emissions Units" upon council and, if possible, clearly specify the affected class of units. The programme's *Scope of Eligibility* that is deemed valid by the ICAO Council will be reflected in the ICAO Document titled "CORSIA Eligible Emissions Units" in a timely manner

 $^{^{2}}$ In *TAB Procedures*, paragraphs 4.5, 7.3 and 8.2 – 8.6 in particular pertain to the *Scope of Eligibility* and notification and assessment of material changes.

³ The *TAB Work Programme and Timeline* and *TAB Procedures* documents are available here: https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx

The Programme is requested to provide the following information regarding any modification(s) to the programme's *Scope of Eligibility* that could constitute a "material change" as described above. <u>Report</u> <u>each change separately</u> by duplicating (copying and pasting) the table below as needed.

Programme name: FOREST CARBON PARTNERSHIP FACILITY (FCPF)

CHANGE 1 Public-facing view of CATS

a. Description of the change (e.g., the addition, modification, deletion undertaken):

The CATS dashboard currently available online (<u>https://cats.worldbank.org/datasummary</u>) includes features to visualize the serial numbers of each batch of units. Under CATS the serial number is denominated Global Carbon Ticket Code (GCTC). CORSIA eligibility is reflected as part of the dynamic element number 14 (3 digits). Units are labelled as CORSIA eligible only after the LOAAs are uploaded into CATS.

Serialization Mechanism

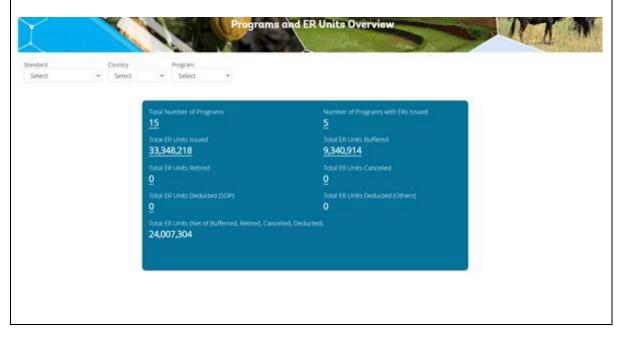
Global Carbon Ticker Code – GCTC: consists of 14 elements, reflected as 74 alpha-numeric characters

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Static Elements	Dynamic Elements
1- Block Serial Number: 12 digits block unique identifier	10- Units Range: tracks the range and serial number of units
2- Country Code: as per ISO 3166	within the block. LIFO (last in first out) bases
3- Program Code: System-Generated Program ID	11- Units Status: based on the transactions processed on the
4- Sector: as per the IPCC guidelines	block
5- Standard	12 - Units Class: as an asset in relation to the verification and certification processes
6- Certification Body	
7- Methodology: MF of the program	13- Units Type: it defines the tradability of the units
8- Verification Body	14 - Compliance with other standards or additional criteria (e.g.,
9- Certification Period	CORSIA Pilot Phase, CORSIA First Phase)

By clicking on Total of ER Units Issued as shown in the below image, will take the user to a dashboard with the units issued so far:



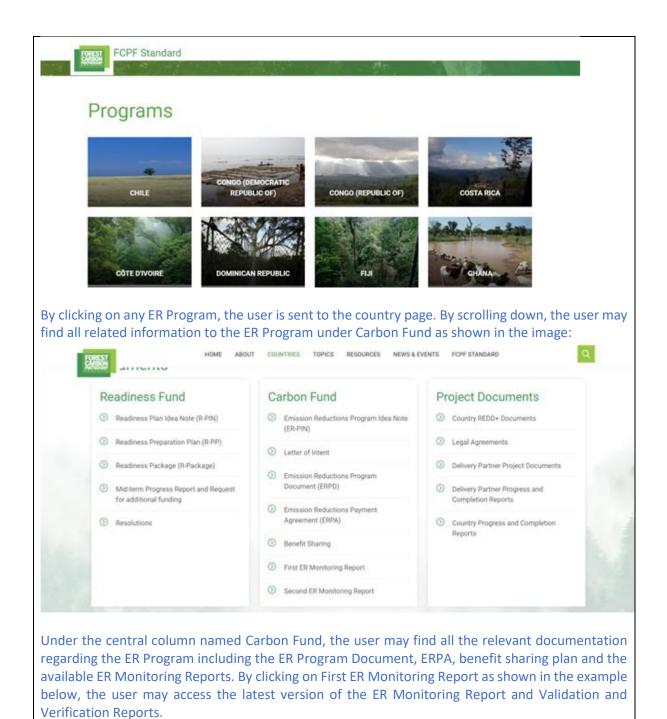
The dashboard displays the units verified, issued, buffered, tradable, non-tradable, cancelled and retired as shown below. By clicking over ER Units Issued of any of the ER Programs, the user will get to a table with the different blocks of issuances:

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The Global Carbon Ticket Code of the specific block may be found under column GCTC Block ID. The full number may be observed by clicking twice on the table or by exporting to Excel:

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Program ID	Program Name	Program Type	Host Country	Standard	Certificati Start Date	Certificati End Date	ER Units Issued	GCTC Block	Number	Number	Export To E Date of Issuance
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P164524	Mozambiq	Agricultur	Mozambiq	WB FCPF CF	May 16, 2	Dec 31, 20	2,060,976	0000000	001209705	003270680	Jun 8, 20

reports are available on the FCPF website. These documents will not be displayed in CATS to avoid duplication of documents. To facilitate access to all documentation regarding the FCPF Program, we have created a micro-site which may be accessed by following the below link: <u>https://www.forestcarbonpartnership.org/fcpf-standard/</u> By scrolling down the user may find the list of 15 ER Programs.



HOME ABOUT COUNTRIES TOPICS RESOURCES NEWS & EVENTS FCPF STANDARD
HOME ALOUT COUNTRIES TOPICS RESOURCES NEWS & EVENTS FORP STANDARD Image: Standard
 b. Rationale for the change: As part of the recommendations issued by the TAB in September 2023, the FCPF was requested to Update the public-facing view of the CATS registry to ensure that, for any jurisdictional programmer is the transmission of the CATS registry to ensure that, for any jurisdictional programmer is the transmission of the CATS registry to ensure that and the transmission of the CATS registry to ensure that and the transmission of the CATS registry to ensure that and the transmission of the CATS registry to ensure that and the transmission of the transmissi
that generates CORSIA-eligible units, the serial numbers for each batch of units that has been issued (including tradeable units that have not yet been cancelled) are displayed, and ensure that all programme documentation related to these units is easily accessible, including the relevant monitoring and varification reports.
monitoring and verification reports.c. Where the change is reflected in the Programme's documentation or other resource(s)⁴:
The updates to the dashboard are reflected on the CATS website: https://cats.worldbank.org/datasummary
 These include: GCTC for issued and tradable units, amongst others Information of the labelling of CORSIA eligibility as part of the GCTC <u>https://cats.worldbank.org/shared/docs/CATS_Knowledge_Operational.pdf</u> Access to FCPF documentation has been made easier by creating a specific micro-site which includes only the relevant document related to FCPF standard and the 15 ER Programs.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
The information included in the previous re-application has been copied and pasted below: a) The identification of the ICAO-eligible units (as the compliance of CF FCPF ER units with other standards), will be explicitly added as a label to the unique serial number (GCTC). The GCTC consists of 13 elements, reflected as 71 alpha-numeric characters that can be described as (i) Static Elements that never change throughout the block lifecycle and define the details and characteristics of the block origin; and Dynamic Elements that are subject to continuous changes through the block life-cycle and define current state and

⁴ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

characteristics of the block in relation to the transactions which have been performed.

Serialization Mechanism

 Global Carbon Ticker Code – GCTC: consists of 13 elements, reflected as 71 alpha-numeric characters

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Static Elements	Dynamic Elements
 Block Serial Number: 12 digits block unique identifier Country Code: as per ISO 3166 	10 -Units Range: Tracks the range and serial number of units within the block. LIFO (last in first out) bases.
3-Program Code: System-Generated Program ID	11 -Units Status: Based on the transactions processed on the block.
 4-Sector: as per the IPCC guidelines 5-Standard 	12-Units Class: As an asset in relation to the verification and certification processes.
6-Certification Body	13-Units Type: It defines the tradability of the units.
7-Methodology: MF of the program.	The compliance with other standards (e.g. ICAO-CORSIA
8-Verification Body	of the ER units issued in the system will be included as a
9-Certification Period	label

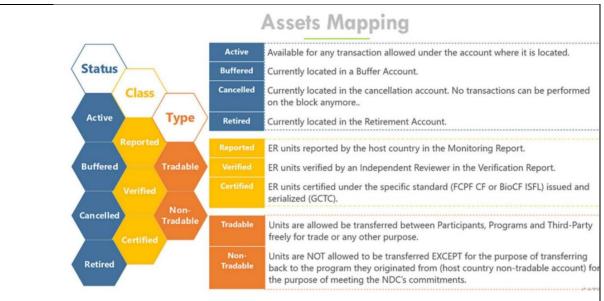
As can be seen from the above figure, the last 3 elements of the serial number characterize ICAO eligible units (status-active, class-certified, type-tradable) and the compliance with the standard will be explicitly labeled to the GCTC. For further details check section 2.3.2.1. Global Carbon Ticker Code (GCTC). ER Units Serialization of the CATS Operational Guidelines https://cats.worldbank.org/shared/docs/CATS_Knowledge_Operational.pdf

b) CATS identifies and facilitates tracking and transfer of unit holding from issuance to cancellation/retirement. The unit's lifecycle starting with issuance until its cancellation or retirement consists of a series of sequential irreversible transactions. Upon the issuance of units, each block is assigned a unique code (GCTC) that contains identifiable elements that facilitate the tracking of the block for the rest of its lifecycle. The holding accounts provide clear and transparent functions that identify the status and ownership of each block at any point in its lifecycle.

The issuance transaction is built with the necessary checks to prevent double issuance and both the retirement and the cancellation transactions are irreversible and final, which serves as a transparent and secure tool to account for the units already utilized for a specific purpose and prevents double claiming. Throughout its lifecycle, the allocation/transfer of units between the different accounts is distinctly identified. The responsibilities of the parties involved in the transactions are clearly defined in strictly observed approval matrix through specific roles and authorizations. Therefore, privileges to process the transactions - including the issuance, transfer, and retirement/cancellation transactions are restricted to responsible parties. For detailed information consult section 2.3.1. of the CATS Operational Guidelines.

https://cats.worldbank.org/shared/docs/CATS_Knowledge_Operational.pdf

c) The status, class, and type of the units are the three dynamic elements, part of the GCTC, that describe if the unit is active, it has been allocated in a buffer account, or it has been canceled or retired. Also, if the unit has been reported, verified, and certified and if we are dealing with a tradable or a non-tradable unit (to be retired against a mitigation goal, e.g. NDC). The GCTC facilitates the tracking of the block for the rest of its lifecycle across multiple accounts.



- d) The serialization function, upon the issuance of units, assigns a unique Global Carbon Ticket Code (GCTC) that contains identifiable elements that facilitate the tracking of the block for the rest of its lifecycle. This unique serial number follows the data exchange protocol of International Transaction Log (ITL) that uniquely identifies the status of emission reductions from issuance to retirement/cancellation.
- e) The serialization function (GCTC) in CATS allows for identification by country (country code as per ISO 3166), sector (IPCC), vintage (certification period), and project registration date (program code)
- f) The ER Transaction Registry has robust security provisions to ensure that credits managed in the registry are secure. A robust KYC (Know your Customer) sanctions screening solution through Lexis Nexis has been implemented for entities and users. This service is operative when creating/editing an entity/user and at the end of the day batch process. Provisions for ensuring the security of units and users in CATS are described in section 2.2.1. Integrity Due Diligence Procedures of the CATS Operational Guidelines.

https://cats.worldbank.org/shared/docs/CATS_Knowledge_Operational.pdf

Moreover, responses provided as part of the live question raised by the TAB in July 2023:

Currently there are no ERs that have been cancelled. An example of how cancelled ERs would look like in the public dashboard is presented below.

It can also be accessed through this link:

https://catshomeqa.itsbgdevpdmz.worldbank.org/datasummary

In order to access to the list of cancelled units, you have to click on the number of cancelled units.

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How the information in "d." would be revised and submitted to any future (re-)assessment pro- roundating the information in "d." to reflect any / all modifications to the Programme's or formation that result from the change: the FCPF is also presenting the link to the updated CATS public dashboard for reassessment by the the FCPF is also presenting the link to the updated CATS Operational Guidelines. tps://cats.worldbank.org/shared/docs/CATS_Knowledge_Operational.pdf tps://cats.worldbank.org/datasummary the FCPF is sharing the new FCPF microsite which shows relevant documentation related to
bal ticket code that includes the specific characteristics for CORSIA eligible units. Weak Weak Weak Weak Weak Weak Weak Weak

CHANGE 2 CATS and Letters of Attestation a. Description of the change (e.g., the addition, modification, deletion undertaken): **Paragraph 57** of the FCPF Process Guidelines has been revised to clarify that LOAAs and other assurances to avoid double claiming will be submitted to the FMT prior to labelling of relevant units as CORSIA-eligible. Moreover, it is clarified that the FMT will made the LOAAs and related double claiming avoidance documentation publicly available in CATS.

Moreover, **paragraph 64** has been modified to clarify that in the case the ER Program has undergone successfully a Validation with extended scope and wishes to label all or a portion of units as CORSIA-eligible units, whether at the time of issuance or after issuance, the ER Program shall provide to the FMT the required documentation described in Section 7.7 of the Process Guidelines (including the LOAA). Once the CORSIA-labelling is deemed approved by the FMT, the Fund Transaction Processor labels the relevant units as CORSIA-eligible units, taking into account any limits that may have been established by the REDD Country in the LOAA or other related documentation.

Paragraph 88 further clarifies that the FMT will make publicly available in CATS and link it to each relevant issuance block, the relevant LOAA submitted by the REDD Country together with any submitted evidence that the Corresponding Adjustment has been applied.

b. Rationale for the change:

As part of the recommendations issued by the TAB in September 2023, the FCPF was requested to update the FCPF procedures and the CATS registry system to clarify when and where the host country letters of attestation will be made publicly available.

c. Where the change is reflected in the Programme's documentation or other resource(s)⁵:

The change is reflected in the FCPF Process Guidelines, paragraphs 57, 64 and 88.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The information originally submitted to the TAB has been copied from the previous reapplication and pasted below:

c) To make publicly available attestations from national governments' designated agencies, CATS Information and Technology Solution (ITS) team is working in parallel to label those FCPF credits as authorized FCPF credits (for which a corresponding adjustment has been applied). All FCPF Credit retirements and cancellations are transparently recorded in public reports on CATS Registry. The public dashboard of CATS can be accessed through https://cats.worldbank.org/datasummary . Information on the specific ER Programs and issuances, as well as the quantity of ER units cancelled (no units have been cancelled so far), the certification period, the start and end of the serial numbers, the date of cancellation, the program code, unit type, host country, methodology and the party cancelling the ERs from their accounts may be accessed by clicking on 'Total ER Units Cancelled'. This information is available for each specific transaction and includes the complete information of the global carbon ticket code assigned to the cancelled ER units.

⁵ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

a) & b) Terms and Conditions of ER Transaction Registry sections 7.02, 8.02, 11.2 (n,o) and article XIV section 14.01; include provisions to address the above items. <u>https://cats.worldbank.org/shared/docs/CATS_Knowledge_Terms.pdf</u>

Moreover, with regards to the provisions or measures to obtain and make publicly available attestations from national governments' designated agencies, the FCPF has designed a sample attestation form (letter of assurance and authorization by the host country) that will be required as needed as an attached document prior to any international transfer of FCPF credits and will be published in the FCPF transaction registry (CATS Carbon Assets Tracking System) along with the third-party transaction request by the host country transaction processor. This form can be found on annex L of the FCPF Process Guidelines. https://www.forestcarbonpartnership.org/sites/fcp/files/documents/FCPF%20Process%20Guideli nes 2023 v5.3.pdf

Moreover, the responses provided to the TAB as part of the last round of clarification questions raised in August 2023 include the following:

The LOAAs for both the ISFL and FCPF will be indeed uploaded and published in CATS. Section 2.3.7. of the CATS Operational Guidelines on International Transfers requiring Corresponding Adjustments, specifies that the designated focal point of the country shall prepare a Letter of Authorization (LOAA) declaring that the country will not use those ERs to track progress towards, or for demonstrating achievement of its NDC and will account for their use by the buyer by applying relevant adjustments.

The LOAA along valid evidence that the country has carried out a corresponding adjustment covered by the LOAA are required prior to label and transfer those units in CATS (e.g. to qualify post-2020 FCPF Credits for CORSIA, this information is required before labeling and will be uploaded in CATS along with the transaction request).

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

The FCPF is sharing a link to the updated Process Guidelines for reassessment by the TAB. <u>https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_process_guidelines_2024_v6.1_0.pdf</u>

CHANGE 3 Address Changes to Country attestations a. Description of the change (e.g., the addition, modification, deletion undertaken):

The ICAO council requested the FCPF to establish procedures to address changes to the number, scale and/or scope of host country attestations.

The FCPF would like to clarify the following:

Host country attestations will be made publicly available on CATS as specified in **paragraph 57** of the FCPF Process Guidelines. The FCPF Process Guidelines clarify now in **paragraph 85** that LOAAs <u>cannot be amended/updated even if a Correspondent Adjustment has not taken place</u>. If the REDD Country has not applied the Corresponding Adjustment and it decides to revise the scale and/or scope of the LOAA, such as decreasing the volume of ERs authorized in the LOAA to be used

for CORSIA, the FMT will proceed to execute the actions described under paragraph 89 of the Process Guidelines (these actions include the execution of the guarantee). On the contrary, if the REDD Country Participant decides to increase the volume of ERs authorized in the LOAA to be used for CORSIA, a new LOAA shall be submitted to the FMT to cover for the additional volume, and the REDD Country will make a new request for labeling of units as CORSIA-eligible.

b. Rationale for the change:

As part of the recommendations issued by the TAB in September 2023, the FCPF was requested to Establish procedures to address changes to the number, scale, and/or scope of host country Attestations.

c. Where the change is reflected in the Programme's documentation or other resource $(s)^6$:

• FCPF Process Guidelines paragraph 85

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The information originally submitted to the TAB has been copied from the previous reapplication and pasted below:

a) & b) Terms and Conditions of ER Transaction Registry sections 7.02, 8.02, 11.2 (n,o) and article XIV section 14.01; include provisions to address the item on "update information pertaining to host country attestation as often as necessary to avoid double-claiming" https://cats.worldbank.org/shared/docs/CATS Knowledge Terms.pdf

Moreover, with regards to the provisions or measures to obtain and make publicly available attestations from national governments' designated agencies, the FCPF has designed a sample attestation form (letter of assurance and authorization by the host country) that will be required as needed as an attached document prior to any international transfer of FCPF credits and will be published in the FCPF transaction registry (CATS Carbon Assets Tracking System) along with the third-party transaction request by the host country transaction processor. This form can be found FCPF on annex Т of the Process Guidelines. https://www.forestcarbonpartnership.org/sites/fcp/files/documents/FCPF%20Process%20Guideli nes 2023 v5.3.pdf

Moreover, the responses provided to the TAB as part of the last round of clarification questions raised in August 2023 include the following:

Suppose that a national government issued an LoAA and then raised concerns about particular units thereunder, declined to apply a corresponding adjustment, and/or reversed a previous adjustment in subsequent reporting under the Paris Agreement. Please describe step-by-step how the FCPF/ISFL would respond, and how MIGA or the other insurance mechanism would interact with the host country and the investor, making reference to the relevant programme procedures in each step.

Please note that according to our discussions with UNFCCC Secretariat, reversal of a previous adjustment in subsequent reporting periods is extremely unlikely. Once the expert review has been

⁶ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

done, countries cannot change their reported corresponding adjustment except for the unlikely situation of an error in reporting.

In the case a country declines to apply a corresponding adjustment the provisions of para 81 of the FCPF Process Guidelines apply. We would suggest going through these detailed steps during the call.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

The FCPF is sharing the link to the updated FCPF Process Guidelines for reassessment by the TAB. https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_process_guidelines_2024_v6.1_0.pdf

CHANGE 4 Double claiming procedures

a. Description of the change (e.g., the addition, modification, deletion undertaken):

The ICAO council requested the FCPF to make a number of improvements to the suite of procedures necessary to prevent double-claiming. The FCPF would like to provide the following clarifications that address the raised issues:

- **Transparent communications**: The program should 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; and update information pertaining to host country attestation as often as necessary to avoid double-claiming.
 - Host country attestations will be made publicly available on CATS as specified in the FCPF Process Guidelines **paragraph 57**.
 - Moreover, paragraph 85 of the FCPF Process Guidelines clarify that LOAAs cannot be amended/updated even if a Correspondent Adjustment has not taken place. If the REDD Country has not applied the Corresponding Adjustment and it decides to revise the scale and/or scope of the LOAA, such as decreasing the volume of ERs authorized in the LOAA to be used for CORSIA, the FMT will proceed to execute the actions described under paragraph 89 of the Process Guidelines. On the contrary, if the REDD Country Participant decides to increase the volume of ERs authorized in the LOAA to be used for CORSIA, a new LOAA shall be submitted to the FMT to cover for the additional volume, and the REDD Country will make a new request for labeling of units as CORSIA-eligible.
 - Moreover, as clarified in paragraph 88, the FMT will keep a publicly available record of any relevant documentation related to the application of double claiming procedures, including documentation submitted by the REDD Country such as LOAAs, evidence that the Corresponding Adjustment has been applied, or if this has not been applied, the applicable Guarantee. The FMT will also record in the FCPF website the actions taken to obtain evidence that the Corresponding Adjustments were applied, including of the type of evidence.
- **Comparing unit use against national reporting**: The program should have procedures in place to compare countries' accounting for emissions units in national emissions reports against the volumes of eligible units issued by the program 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 86** of the FCPF Process Guidelines clarifies that within one year after the application of the adjustment is required to be reported by the REDD Country Participant to the UNFCCC under Article 13 of the Paris Agreement, the FMT will verify that the REDD country has carried out a Corresponding Adjustment for CORSIA-eligible units covered by a LOAA. Verification procedures and acceptable evidence that the corresponding adjustment has been made, may be found in Paragraphs 86 and 87.
- Moreover, the LOAA template provided in **Annex 1** of the FCPF Process Guidelines includes a declaration that the country shall report on the authorization and use of the REDD+ emission reductions for the CORSIA [or by other countries] in a transparent manner in the country's biennial transparency report submitted under Article 13 of the Paris Agreement.
- **Program reporting on performance:** The program should be prepared to report to ICAO's relevant bodies, as requested, performance information related to, inter alia, any material instances of and program responses to country-level double-claiming; the nature of, and any changes to, the number, scale, and/or scope of host country attestations; any relevant changes to related program measures.
 - **Paragraph 90** of the FCPF Process Guidelines has been edited to specify that the FMT will elaborate, publish and share with UNFCCC and ICAO's relevant bodies, on a yearly basis, reports with aggregated information, including performance information related to, inter alia, any material instances of and program responses to country-level double-claiming; the nature of, and any changes to, the number, scale, and/or scope of host country attestations; and any relevant changes to related program measures.

The FCPF annual reports will include the following information:

- a) Total units issued by country, calendar year, and needing and adjustment;
- b) Total units issued;
- c) Issued and covered by a LOAA;
- d) Qualified as CORSIA eligible;
- e) Cancelled to meet offsetting requirements under CORSIA;
- f) Cancelled for purposes other than meeting offsetting requirements under CORSIA.
- g) Total CORSIA Eligible Emissions Units cancelled by aeroplane operator for each compliance period to meet offsetting requirement under CORSIA;
- h) Maximum number of emission reductions and removals from ER Programs authorized by countries through LOAAs for use by [other countries and] entities by country and year.
- **Reconciliation of double claimed mitigation**: The program should have procedures in place for the program, 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 84** of the FCPF Process Guidelines has been adjusted to clarify the procedures in place for the REDD Country, to compensate for, replace, or otherwise reconcile double-claimed mitigation associated with units used under the CORSIA. The adjusted procedure is described below:

Unless the ER Program provides evidence in line with the requirements set out in Section 87 of the Process Guidelines that the Corresponding Adjustment pertaining the ERs covered by the LOAA has already been carried out at the time of the request for labeling of units as CORSIA-eligible, in order to guarantee that the emissions units covered by a LOAA are not subject to double claiming, the REDD Country shall obtain a Guarantee, in a form acceptable to the World Bank and submit it to the FMT as part of the request for labeling of units as CORSIA-eligible. The Guarantee protects the losses arising from a government's revocation and repudiation of its commitments under the LOAA including corresponding adjustment and other carbon rights, as applicable, which will lead to non-enforcement of arbitral awards. The compensation will be provided to the Guarantee beneficiary, in monetary terms based on the purchase price. Once the retirement of relevant units has taken place, the REDD Country Participant and/or the Guarantee beneficiary shall provide proof of such retirement to the FMT. This Guarantee could be from a reputable third-party, an entity such as the Multilateral Investment Guarantee Agency (MIGA) or a World Bank-approved insurance mechanism.

b. Rationale for the change:

As part of the recommendations issued by the TAB in September 2023, the FCPF was requested to develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant guidelines, mindful of TAB's considerations and analysis contained in the document Clarifications of TAB's Criteria interpretations.

c. Where the change is reflected in the Programme's documentation or other resource(s)⁷:

• FCPF Process Guidelines paragraphs 84, 85, 86, 87, 88, 89, 90, and annex 1

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

The information originally submitted to the TAB has been copied from the previous reapplication and pasted below:

a) Per section 6.2 and criterion 23 of the FCPF Methodological Framework, programs are expected to coordinate with host countries to select appropriate arrangements to avoid double counting, including double issuance, double selling/use, or double claiming, in order to track the ERs to ensure that any ERs that have been generated, monitored and verified under the FCPF ER Program and paid for by the Carbon Fund are not used again by any entity for sale, public relations, compliance or any other purpose unless otherwise agreed by the parties to the ERPA and, where relevant, consistent with any applicable guidance adopted under the Paris Agreement. The systems that should be in place to avoid double counting, issuance and claiming include the national REDD+ Programs and Projects Data Management System and an ER Transaction Registry. The ER Transaction Registry has capabilities to register, track, and as appropriate retire or cancel ER units generated under

⁷ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

FCPF ER Programs.

The link to the FCPF ER Program Requirements is below: <u>https://www.forestcarbonpartnership.org/system/files/documents/fcpf carbon fund m</u> <u>ethodological framework revised 2020 final posted.pdf</u>

The World Bank Carbon Asset Tracking System, CATS provides a strong and reliable architecture to create, govern, store, and maintain data; guarantees operational transparency and security; and mitigates double-counting risks for the ER units generated under the World Bank. Specific provisions can be found in CATS operational guidelines section 2.3.2. Recording and Issuance: 2.3.2.1. Global Carbon Ticker Code (GCTC).ER Units Serialization

https://cats.worldbank.org/shared/docs/CATS_Knowledge_Operational.pdf.

Specific provisions can be found in CATS Terms & Conditions:

-- Section 7.02, paragraph (d) - Transfers of ERs that result in Double-Counting, Double-Selling, or Double-Claiming are prohibited;

--Section 8.02, paragraph (b) – Cancel lation of ERs for erroneous or fraudulent use, including but not limited to the ERs or Buffer ERs subject to Double-Counting, Double-Selling or Double-Claiming;

- Section 11.02, paragraph (n) – User represents and warrants is not aware of nor has engaged in Double-Counting, Double-Selling or Double-Claiming of the ERs and Buffer ERs, and (o) has not registered and will not register any ERs simultaneously both in CATS and in any other system.

- Section 14.01 - (a) Users shall not engage in Double-Counting, Double-Selling or Double-Claiming of ERs or Buffer ERs, (b) shall immediately notify the Registry Operator in writing in case becomes aware of those, and (c) the Registry Operator may immediately suspend the associated Registry Accounts (Section 15.01).

- Section 15.01 – (a) The Registry Operator may temporarily suspend the User's Registry Account and its access to the Registry if reasonably believes that (v) any ERs or Buffer ERs have been or are suspected to be subject to Double-Counting, Double-Selling or Double-Claiming.

https://cats.worldbank.org/shared/docs/CATS_Knowledge_Terms.pdf

a) and b) The ER Transaction Registry has capabilities to issue one unit for one tonne of mitigation and to transfer, retire/cancel by only one entity at a time to avoid double counting of ERs.

c) and d) Section 6.2 of the FCPF Methodological Framework specify that host countries implementing ER programs shall select an appropriate mechanism to avoid double counting, including double issuance, double selling/use, or double claiming, to track the ERs and ensure that any ERs that have been generated, monitored and verified under the FCPF ER Programs and paid for by the Carbon Fund are not used again by any entity for sale, public relations, compliance or any other purpose. The ER Transaction Registry has capabilities to register, track, and as appropriate retire or cancel ER units generated under the FCPF ER program. The procedures are described in the Operational Guidelines for Emission Reductions Transaction Registry. https://cats.worldbank.org/html/knowledge.html

The national governments need to comply with the Terms and Conditions of the ER Transaction registry (CATS - Carbon Assets Tracking System) to demonstrate no Double-Counting, Double-Selling, or Double-Claiming of ERs. The national governments through the acceptance of the Terms and Conditions, acknowledge (Section 11.02 paragraphs (n) (o)) no Double-Counting, Double-Selling, or Double-Claiming of the ERs and Buffer ERs, and that ER programs are not

registered and will not register ERs simultaneously in CATS ER Registry and other registries. The common application of the Terms and Conditions of CATS to all national governments ensures that FCPF procedures to prevent double counting and double claiming are uniformly applicable to all national governments hosting FCPF ER Programs.

Additionally, paragraph 34, item (e) of Section 8.2 of the FCPF Validation and Verification Guidelines, requires Verification Bodies to assess the extent to which systems to avoid that ERs generated under the FCPF ER program have not been counted or compensated for more than once have been adequately implemented and confirm that issuance has not occurred in other known registries.

https://www.forestcarbonpartnership.org/system/files/documents/fcpf_validation_and_verif_ ication_guidelines_2021_ver_2.4.pdf

The FCPF constantly engages with countries implementing ER programs to make them aware of the FCPF procedures on Validation and Verification, and CATS ER Transaction Registry to prevent the risk of double-counting and to assist national governments to develop procedures that comply with FCPF procedures to avoid the risk of double counting. In relation to CATS ER Transaction Registry, the FCPF constantly engages with countries to discuss the steps required to comply with the Terms and Conditions of CATS ER Transaction Registry and to strengthen the capacity of national governments to have procedures in place to address double counting before FCPF credits can be issued. Records of meetings and webinar sessions covering these FCPF events. topics can be found on the website under https://www.forestcarbonpartnership.org/meetings

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

The FCPF is sharing the link to the updated FCPF Process Guidelines for reassessment by the TAB. https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_process_guidelines_2024_v6.1_0.pdf

CHANGE 5 CDM

a. Description of the change (e.g., the addition, modification, deletion undertaken):

The FCPF does not rely on any CDM methodologies, processes and institutions, requirements, and/or tools, and thus does not have any CDM elements to monitor

b. Rationale for the change:

As part of the recommendations issued by the TAB in September 2023, the FCPF was requested to Put procedures in place for FCPF to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon. c. Where the change is reflected in the Programme's documentation or other resource(s)⁸:

N/A. No updates were included.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

N/A Previous information related to the CDM has not been shared with the TAB because the FCPF does not rely on any CDM methodologies, processes and institutions, requirements, and/or tools, and thus does not have any CDM elements to monitor.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

N/A No sections/documents were updates as a result of this request.

⁸ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

CHANGE 6 Updates to FCPF normative documents

a. Description of the change (e.g., the addition, modification, deletion undertaken):

During the current fiscal year (July 2023-June 2024) the FCPF included several updates to the core normative documents to reflect lessons learned and strength the performance of the FCPF portfolio. Although the FCPF considers that **these are not material** changes, these are provided below for transparency purposes. The summary of the updates is described below:

- FCPF Process Guidelines: in addition to the updates mentioned in this material change form, and the ones explained in the previous re-application to CORSIA, the document now includes section 7.5.3 to allow ER Programs update over time their ability to transfer title to ERs. This update was included given that some ER Programs are not able to demonstrate its ability to transfer the title (and get paid) of all ERs generated for a specific reporting period at the time of verification, but as they move forward with the Program implementation, they can increase the percentage of ERs for which they have the ability to transfer title. New procedures allow ER Programs to update their ER Monitoring Repots and VVBs to update their Verification Reports to enable the issuance of additional ERs.
- Validation and Verification Guidelines: some additional clarifications applicable to Validation and Verification Bodies (VVBs) were included to facilitate the execution of validations and verifications. These include requirements to ensure the presence of an interpreter different to the local expert (whenever necessary); to limit the response time from VVBs to ER Programs, and to accept VVBs accredited by an Accreditation Body that is signatory to the IAF ISO 14065 Multilateral Recognition Agreement (MLA). The latter was done to increase the potential number of VVBs that could conduct assessments of FCPF Program.
- **Buffer Guidelines**: further provisions have been included to 1) facilitate the reversal risk assessment conducted by ER Programs and VVBs (see annex I, reversal risk tool), and to clarify the rules to manage and transfer ERs by ER Programs that have suffered reversals. These updates are currently not mandatory because they are subject to further socialization. They will become mandatory only after the end of the grace period of six months starting from the date of socialization of these updates via a webinar.
- **Monitoring Report Template**: sections 4.3 and section 8 were adjusted to allow ER Programs report ERs from removals (coming from reforestation/afforestation) separately. Also, Annex 5 was included to provide a detailed report on the application of the Reversal Risk Assessment Tool presented in the Buffer Guidelines (above). This last update is voluntary, and will become mandatory six months from the socialization of these changes with countries planned for Q2 2024.
- A summary of the above mentioned changes can be found on the below Program Announcement: https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_program_annou

https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_program_annou ncement_fcpf_updates_feb_2024.pdf

b. Rationale for the change:

According to ICAO, Programmes which are approved to supply CORSIA Eligible Emissions Units are encouraged to use the Material Change Form to inform TAB of any material changes. Because the FCPF has been approved for the pilot phase, the FCPF is here presenting the updates included in the normative documents during the last six months.

c. Where the change is reflected in the Programme's documentation or other resource(s)⁹:

⁹ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

- FCPF Process Guidelines section 7.5.3
- FCPF Validation and Verification Guidelines, section 6, 7.6 and 11
- Buffer Guidelines sections 8, 10 and annex 1
- Monitoring Report template sections 4.3, 8 and annex 5

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

N/A Previous information related to these updates has not been presented to the TAB

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

The FCPF is sharing the below links to the updated normative documents for reassessment by the TAB.

- Process Guidelines (link to be updated to include these updates) https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_process_guidelines_2024_v6.1_0.pdf
- Validation and Verification Guidelines <u>https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_validation_and</u> _verification_guidelines_2021_ver_2.5.pdf
- Buffer Guidelines
 <u>https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_buffer_guidelin
 es_v4.1_february_2024.pdf</u>
- Monitoring Report Template https://www.forestcarbonpartnership.org/sites/default/files/documents/fcpf_emission_reduc tions_monitoring_report_v3.0.docx