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

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

(Version 2, February 2024)

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SECTION I: ABOUT THE ASSESSMENT OF RE-APPLICATIONS

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]. The results of 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] 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). Any programme that submitted its application(s) in previous assessment cycles and would like to re-apply for TAB assessment must fill out this Re-application form.

The assessment process involves collecting information from each programme through this programme Re-application form and supplementary materials and requested evidence. In undertaking this work, TAB may also ask programmes to provide specific examples or case studies illustrating how programme procedures or systems perform in practice. Through this assessment, the TAB will develop recommendations on the list of eligible emissions unit programmes (and potentially activity types and unit dates) for use under the CORSIA first phase, which will then be considered by the ICAO Council.

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This form is accompanied by, and refers to, Appendix A "*Supplementary Information for Assessment of Emissions*

[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/TAB.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

Unit Programmes", containing the EUC and *Guidelines for Criteria Interpretation*. These EUC and Guidelines are provided to inform programmes' completion of this Re-application form, in which they are cross-referenced by paragraph number.[5]

This form is also accompanied by Appendix B "*Programme Assessment Scope*", and Appendix C "*Programme Exclusions Scope*", which request all re-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 Re-application form, "*Emissions Unit Programme Registry Attestation"* in line with the instructions contained that Appendix. 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 Re-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: As was done previously, 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 Re-application form, and any supporting evidence or clarification provided by the programme including information designated as "business confidential" by the programme, 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 Programe 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

[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)")

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 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 Re-application form, including accompanying evidence and with required appendices, through the ICAO CORSIA website no later than close of business on **4 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 align with the questions included in the application for TAB's annual assessment, and are derived from the CORSIA emissions unit eligibility criteria (EUC) and any *Guidelines for Criteria Interpretation*. 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*".

Re-application Form completion

Any programme that submitted its application(s) in previous assessment cycles and would like to apply in 2024 for TAB assessment must fill out this Re-application form. (Programmes that have never applied for TAB assessment are invited to instead use the Application form, which is designed for first-time applicants.) The programme is expected to respond to all questions in this application form at the time of application submission. TAB cannot initiate its assessment 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 assessment process.

A "complete" response involves three components: 1) a written summary response, 2) supporting evidence, 3) planned programme revisions, and 4) updates and changes to programme procedures since the previous application/approval.

1) Written summary responses: 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) Supporting evidence: 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) Planned programme revisions: 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).

4) Updates and changes to programme procedures since the previous application/approval: Each question in this form provides discrete fields for the programme to include, and clearly distinguish between, two key pieces of information:

(1) the information provided by the programme in its previous application—which includes all written clarifications and explanations shared with TAB over the course of the programme's previous assessment;

and

(2) new information describing any and all procedural changes and updates that programmes introduced ***between the dates of*** **(a)** their previous application or approval by ICAO Council and **(b)** 4 March 2024. Here, Programmes are requested to summarize and provide evidence of any and all changes, including those

that were previously submitted for TAB's review as potential material changes.

Scope of re-application

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.

For programmes already eligible to supply emission units for the pilot phase, the programme may elect to revise the scope of activities supported by the programme and assessed by TAB, as compared to its current scope of eligibility. In such a case, the programme is requested to clearly identify, in the following Appendices, the additional 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 were included in the previous application and were previously assessed by TAB and if applicable, **currently eligible under the *Scope of Eligibility*[7], and additional elements that the programme is submitting for TAB's assessment**; 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 that were excluded from TAB's previous assessments or are **currently outside of programme's *Scope of Eligibility,* and additional elements that the programme wishes to exclude from TAB's assessment**; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements.

In **Appendix D** "*Emissions Unit Programme Registry Attestation*", the programme should complete and submit the information outlined in the instructions below, based on the status of its *Registry Attestation*:

- Programme **has not** previously completed and submitted a *Registry Attestation*: Refer to the instructions for completing the attached *Emissions Unit Programme Registry Attestation*, including the signature page and accompanying information form **(**Appendix D**)**. Provide the completed materials along with this application form.

- Programme **has** previously completed and submitted a *Registry Attestation*: Respond only to Question 7.3 in the *Emissions Unit Programme Registry Attestation* form **(**Appendix D**)**. ICAO will append this response to the programme's most recent *Registry Attestation* on file.

    - NOTE: These Programmes **are not** required to re-submit the *Registry Attestation*'s signature page or any other information in Questions 7.1, 7.2, 7.4–7.11 of Appendix D, but may use this opportunity to inform ICAO of any needed updates.

[7] As defined in the latest *ICAO Document "CORSIA-Eligible Emissions Units"*, available via https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-Emissions-Units.aspx

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[8]. **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 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, 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 emissions unit criteria (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

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

published on the ICAO website.

SECTION III: RE-APPLICATION FORM

PART 1: General information

A. Programme Information

Programme name: International Carbon Registry

Administering Organization[9]: Loftslagsskrá Íslands ehf. (International Carbon Registry)

Official mailing address: info@carbonregistry.com

Telephone #: +3548642388

Official web address: www.carbonregistry.com

B. Programme Administrator Information

Full name and title: Guðmundur Sigbergsson, Founder and CEO

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

E-mail address: gudmundur@carbonregistry.com Telephone #: +3548642388

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:

Guðmundur Sigbergsson,	CEO
Ólafur P. Torfason	Co-CEO
Björn H. Helgason	CPO
Þórður Ágústsson	CTO
Daníel F. Jónsson,	Chair of the ICR Board
Kristján I. Mikaelsson,	ICR Board member
Ragnar Þ. Valgeirsson,	ICR Board member

[9] Name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme, *if different from "Programme Name"*.

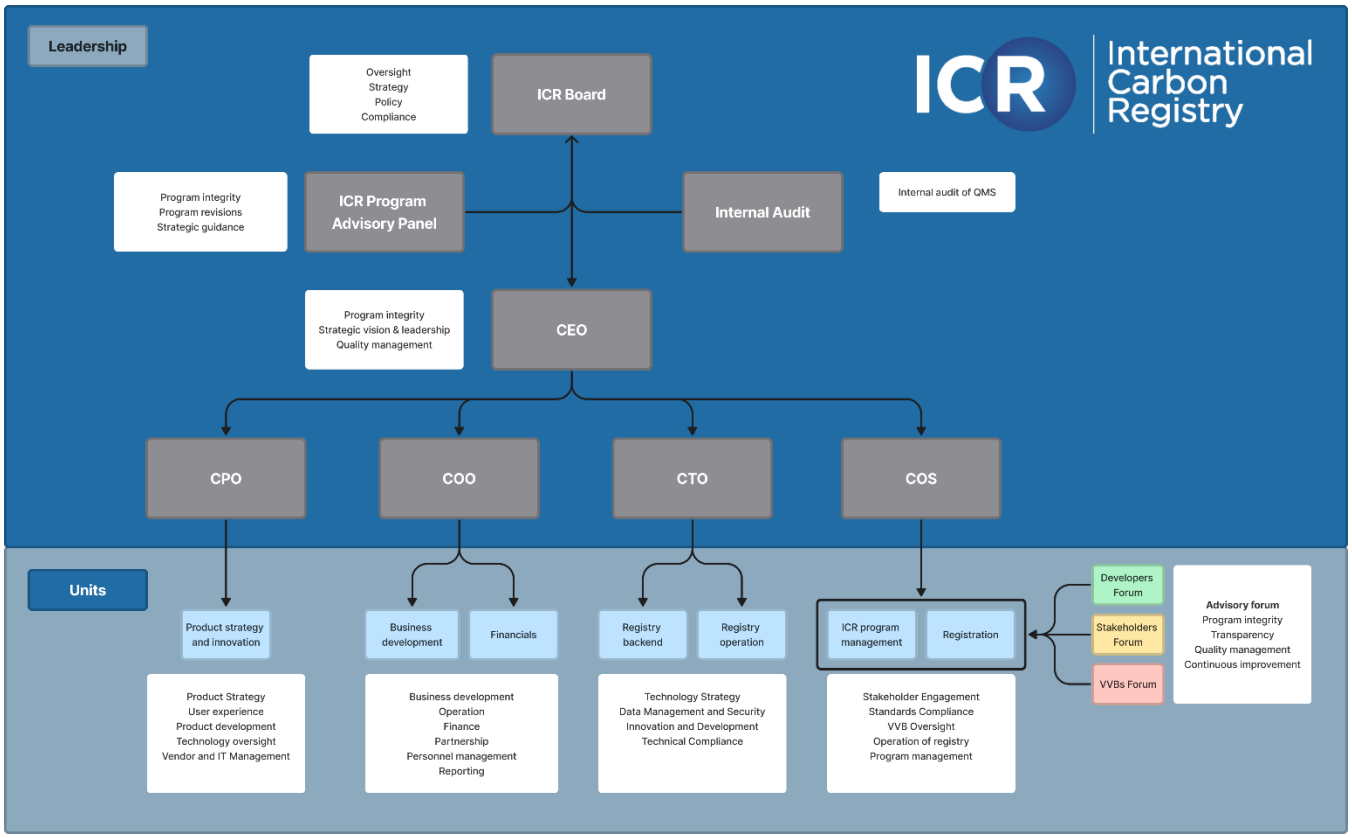
Provide an **organization chart** (in the space below or as an attachment) that illustrates, or otherwise describes, the functional relationship a) between the individuals listed in D; and b) between those individuals and programme staff / employees; and c) the functions of each organizational unit and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

All information about ICR and its governance is readily available on ICRs documentation site which is publicly available using the following link.

See: https://documentation.carbonregistry.com/documentation/about-icr/leadership

Governance

The ICR Program is administered and guided by ICR, leveraging the collective expertise and insights of the ICR Board, ICR Program Advisory Panel, its dedicated leadership and staff, various forums, and valuable stakeholder contributions obtained through active engagement.



The ICR Board is responsible for setting the strategic direction of the International Carbon Registry (ICR) and actively seeks expansion opportunities while monitoring carbon market developments. It has the authority to make decisions on documentation, methodologies, and operational procedures for the ICR program, ensuring adherence to accreditation standards and environmental integrity. Additionally, the board develops and maintains the ICR registry, ensuring transparency and public accessibility of project activities and issued carbon credits.

ICR Program Advisory Panel serves as a key advisory body within the International Carbon Registry (ICR), composed of technical experts who provide guidance on the strategic direction and operational improvements of the ICR's program. Its responsibilities include reviewing and advising on establishment or revision of ICR program requirements and methodologies. The PAP operates under the selection and oversight of the ICR board, ensuring a balance of gender and regional representation among its members, who are chosen for their expertise and understanding of carbon market dynamics.

ICR Leadership is the entity responsible for the ICR Program, its development, management, and oversight. The ICR Leadership is further responsible for the registration, issuance, and transactions of ICCs.

ICR Forums function as a pivotal resource in advancing the ICR Program. Their insightful guidance is instrumental in ensuring that the program aligns with the dynamic needs of the carbon market, particularly as it expands and intensifies its contribution to climate benefits. Furthermore, the Forums are crucial in ensuring that the ICR Program incorporates appropriate rules and standards.

ICR´s leadership comprises the CEO, COO, CTO, CPO, CSO, and the ICR´s board, and it is considered top management. The leadership commits to continuous development and implementation of the QMS by:

a) Taking responsibility for the effectiveness of the QMS;
b) Ensuring that the quality policy and objectives are set for the QMS and its processes, which are consistent with the external strategy and context of the company;
c) Ensuring the integration of the QMS requirements and the requirements of the standard ISO 14064-2, ISO 14064-3, ISO 14065, and ISO 14066 with other activities of the company, as applicable;
d) Promoting personnel and external party awareness of the QMS;
e) Ensuring that necessary resources are available for the QMS;
f) Communicating the importance of effective quality management, compliance with the management system requirements, and meeting the requirements of the standards ISO 14064-2, ISO 14064-3 ISO 14065, and ISO 14066;
g) Ensuring that the QMS achieves the intended results;
h) Participating, guiding, and supporting personnel and external parties in contributing to the effectiveness of the QMS;
i) Promoting continuous improvements;
j) Supporting the appropriate management roles of others to demonstrate their leadership as appropriate for their areas of responsibility.

The procedure of ICR's board review includes ensuring the satisfaction of its customers by identifying their needs and expectations. These are translated into requirements that ICR shall meet to ensure customer satisfaction. At the same time, ICR ensures that the interests it needs to protect are secured, including impartiality and the requirements made to ICR according to laws, rules, and standards, including ISO 14065, where relevant.
This is done by ensuring that:

a) Customer and relevant legal and regulatory requirements are determined, understood, and always met;
b) Risks and opportunities that may affect the consistency of the service provided by ICR and the ability to increase customer satisfaction are identified, assessed, and addressed;
c) Impartiality is maintained in all respects;
d) The emphasis on increasing customer satisfaction is maintained;

e) The emphasis is placed on continually meeting the requirements of the standard ISO 9001, and projects meet the requirements of ISO 14064-2, and VVB are accredited for ISO 14065 and follow ISO 14064-3 for their assessments.

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 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 3.1. Clear methodologies and protocols, and their development process

Provide *evidence*[10] 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*)

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

The program's qualification and quantification methodologies and protocols are in place and publicly available for use.

The ICR approves existing methodologies established by other GHG programs that are currently active and any new methodologies that have been approved through the ICRs methodology approval process. The list of approved methodologies and sectoral scopes can be accessed on the ICR website under ICR Templates and Documentation titled ICR Approved Methodologies. Methodologies approved by ICR are active methodologies developed and approved under Clean Development Mechanism (CDM), Verified Carbon Standard (VERRA), and American Carbon Registry (ACR).

[10] 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*".

The document, ICR Approved Methodologies, displays the methodology's sectoral scope, reference, and title. The methodology title is linked with the original methodology publication, making it seamless to access the methodology in question. Sectoral scopes covered by ICRs approved methodologies are listed on page 12 of the ICR Approved Methodologies document.

ICR has implemented an approval process for new emerging methodologies, where a robust framework for approval is established to ensure the integrity of the mitigation activity. The framework for approving new methodologies is further explained in the next question of this application form. ICR has yet to approve new methodologies under the ICR program.

2023 - application

The program's qualification and quantification methodologies and protocols are in place and publicly available for use.

Generally, GHG programs provide robust methodologies for the implementation of climate projects that projects need to conform to for eligibility under the GHG program. Approval of new methodologies follows a strict process that ICR provides. Methodology development and recognition under GHG programs can however delay implementation and decelerate scaling of climate action where solutions cannot utilize VCMs to support the implementation of impactful solutions.

There is a need for an effective and progressive response to the urgent threat of climate change based on the best available scientific knowledge. At the same time, there's a call for the standardization of VCMs to enhance comparability and consistency. ISO is an independent, non-governmental international organization with a membership of 167 national standards bodies. ISO brings together experts to share knowledge and develop voluntary, consensus-based, market-relevant international standards through its members. International organizations, governmental and non-governmental, in liaison with ISO, take part in the work of developing standards. Standards are developed by sector-specific experts. ISO produces documents supporting scientific knowledge transformation into tools that will help address climate change. ISO standards, therefore, support innovation and provide solutions to global challenges such as climate change.

ISO 14064-2 provides principles and requirements for determining baselines, and monitoring, quantifying, and reporting of project emissions. It focuses on GHG projects or project-based activities specifically designed to reduce GHG emissions and/or enhance GHG removals.

To provide a platform for climate actions that haven't a go-to approved methodology and support accelerated deployment of prominent climate solutions, ICR allows registration of projects demonstrate conformity to ISO 14064-2 and the ICR requirements, providing them with access to VCMs with the issuance of carbon credits prior to methodology approval.

I addition to this approach, the ICR approves existing methodologies established by other GHG programs that are currently active and any new methodologies that have been approved through the ICRs methodology approval process. The list of approved methodologies and sectoral scopes can be accessed on the ICR website under ICR Templates and Documentation titled ICR Approved Methodologies. Methodologies approved by ICR are active

methodologies developed and approved under Clean Development Mechanism (CDM), methodologies developed by project proponents and/or ICR.

The document, ICR Approved Methodologies, displays the methodology's sectoral scope, reference, and title. The methodology title is linked with the original methodology publication, making it seamless to access the methodology in question. Sectoral scopes covered by ICRs approved methodologies are listed on the final page of the ICR Approved Methodologies document.

ICR has implemented an approval process for new emerging methodologies, where a robust framework for approval is established to ensure the integrity of the mitigation activity. The framework for approving new methodologies is further explained in the next question of this application form. ICR has yet to approve new methodologies under the ICR program however few are currently being validated.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application, ICR has completed four public consultations on new methodologies. Final approval is still pending. The full context of the Public consultations can be found using the following link.:

Methodologies - ICR Program (carbonregistry.com)

In addition, in 2023 ICR conducted a public consultation on new documentation relating to validation and verification. ICR validation and verification specification were issued in late 2023 where guidelines are provided for VVB assessing new methodologies (in addition to ICR project related validation and verification) The full context of the new documentation can be found using the following link.

Criteria - ICR Program (carbonregistry.com)

Summarize the programme's process for developing further methodologies and protocols, including the timing and process for revision of existing methodologies. (Paragraph 2.1)

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and questions pertaining to this question:

2022 - application

ICR promotes methodology development. If ICR, or other GHG programs, have not already approved a methodology applicable for a climate solution, a new methodology needs to be developed and proposed for approval by the ICR. The methodology development process is described in the ICR Methodology Process available on the ICR website. ICR allows project proponents to develop and propose approval for new methodologies for climate projects. For the methodology to be approved, it shall be validated according to ISO 14064-2 by an approved VVB and requires further stakeholder consultation and impartial internal assessment for conformity to the ICR Program.

The requirements are further outlined in the Methodology Requirements Document available on the ICR website: https://carbonregistry.com/templates/

The methodology approval process is according to the diagram below.

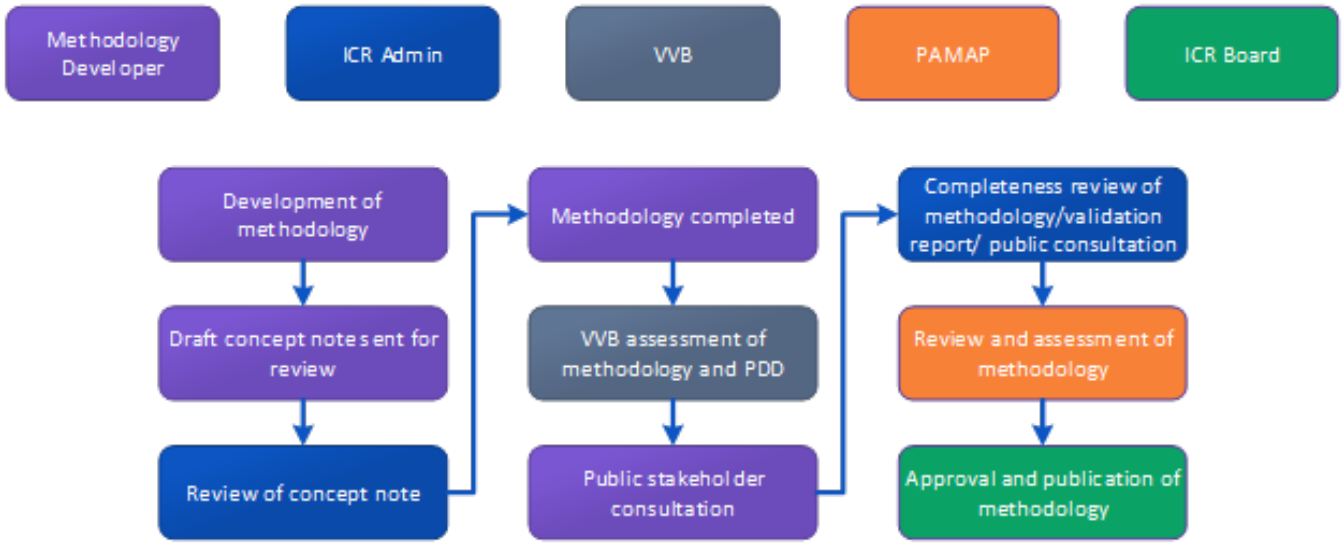


Figure 2: Methodology approval process

New methodology proposals and methodology revisions are approved through the process set out in the ICR Methodology Approval Process which consists of a review by ICR, a public stakeholder consultation, an independent assessment by a validation/verification body, a review from the PAMAP, and a final approval by the ICR Board.

Methodologies include requirements towards a specific type of climate project that, with their application, conform to the requirements of ISO 14064-2, ICR requirements, and other normative requirements. They set out requirements and guidelines for establishing the baseline scenario, quantification, monitoring, and confirmation requirements that ensure consistency in their application and resulting impacts in mitigation outcomes specific climate projects. For the methodology development, the methodology developer shall conform to requirements set out in ICR Methodology Requirements. Use the Methodology description template, available on the ICR website, for the development and strive to safeguard structural integrity, consistency, and readability. The methodology shall follow all instructions in the Methodology description template and justify all deviations. Methodology developers are invited to submit a concept note to the ICR outlining the principles of the methodology.

Templates are available on ICR website: https://carbonregistry.com/templates/

2023 - application

ICR promotes methodology development. If ICR, or other GHG programs, have not already approved a methodology applicable for a climate solution, a new methodology needs to be developed and proposed for approval by the ICR. The methodology development process is described in the ICR Methodology Process available on the

ICR website. ICR allows project proponents to develop and propose approval for new methodologies for climate projects. For the methodology to be approved, it shall be validated according to ISO 14064-2 by an approved VVB and requires further stakeholder consultation and impartial internal confirmation for conformity to the ICR Program. The requirements are further outlined in the Methodology Requirements Document available on the ICR website: https://carbonregistry.com/explore-our-program/

The methodology approval process is according to the diagram below.

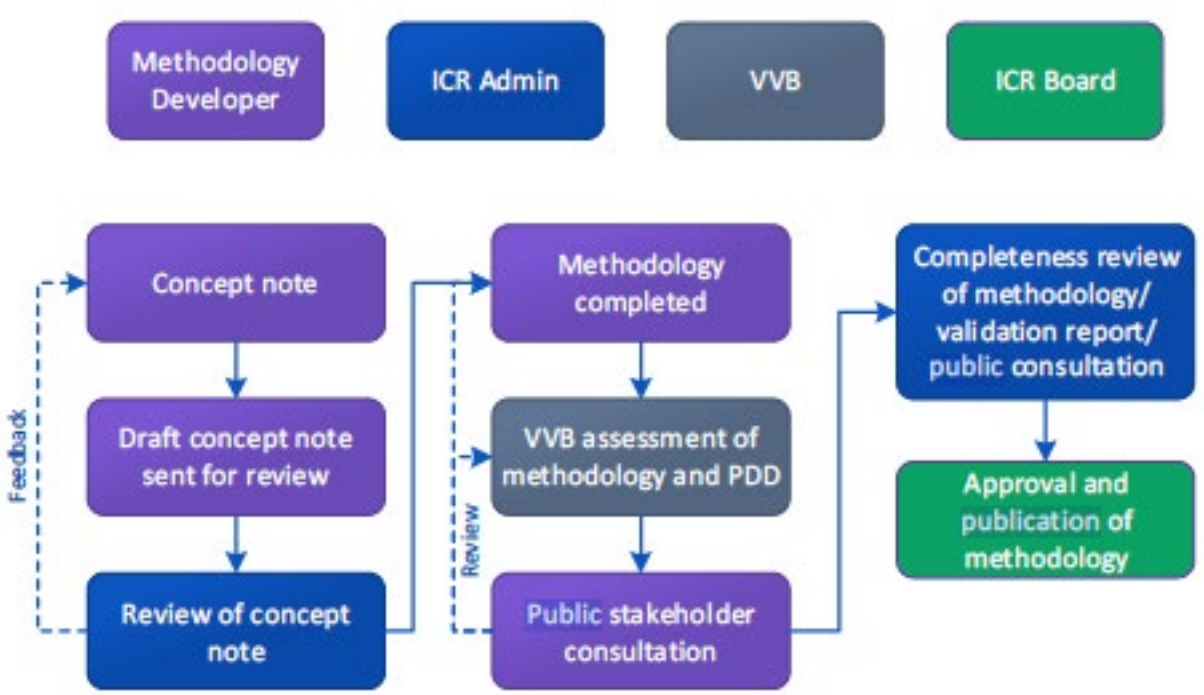


Figure 2: Methodology approval process

New methodology proposals and methodology revisions are approved through the process set out in the ICR Methodology Approval Process which consists of a review by ICR, a public stakeholder consultation, an independent assessment by a validation/verification body and a final approval by the ICR Board.

Methodologies include requirements towards a specific type of climate project that, with their application, conform to the requirements of ISO 14064-2, ICR requirements, and other normative requirements. They set out requirements and guidelines for establishing the baseline scenario, quantification, monitoring, and confirmation requirements that ensure consistency in their application and resulting impacts in mitigation outcomes specific climate projects. For the methodology development, the methodology developer shall conform to requirements set out in ICR Methodology Requirements. Use the Methodology description template, available on the ICR website, for the development and strive to safeguard structural integrity, consistency, and readability. The methodology shall follow all instructions in the Methodology description template and justify all deviations. Methodology developers are invited to submit a concept note to the ICR outlining the principles of the methodology.

Templates are available on ICR website:
https://carbonregistry.com/templates/
https://carbonregistry.com/explore-our-program/

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

All documentation relating to the ICR program is available on ICR documentation page available using the following link. https://documentation.carbonregistry.com/documentation/

The methodology requirements and methodology approval process are under the methodology development section using the following links.

1. Methodology Development - ICR Program (carbonregistry.com)
2. Criteria - ICR Program (carbonregistry.com)
3. Procedural - ICR Program (carbonregistry.com)

Templates for concept notes and methodologies can now be found in the methodology development section using the following link. Templates - ICR Program (carbonregistry.com)

Templates for methodology validation is available under validation and verification section using the following link. Templates – ICR Program (carbonregistry.com)

During recent revision of the program in 2023 and early 2024 no material revisions have been made on methodology approval procedures or requirements.

In addition ICR revised the ICR process requirements in early 2024. The revision emphasizes the criteria for validation of projects registering with ICR. As outlined throughout the ICR documentation, the criteria for validation are at minimum ISO 14064-2 and the ICR requirement document.

In section 3.1 in the ICR process requirements it's specially addressed ICR's view towards methodologies,

[A methodology refers to a systematic approach or set of procedures used to quantify and measure GHG emissions mitigations. These methodologies provide a standardized framework for estimating, monitoring, and verifying emission mitigations, allowing for consistent and comparable results across different projects applying the methodology. These methodologies typically establish criteria and prescribe procedures for projects to follow for data collection, quantification, monitoring, and reporting GHG emissions mitigations for projects ex-ante and ex-post and serve as good practice guidance.]

In this relation ICR has two pathways for project registration.

1. Following a preapproved methodology. Where the criteria are ICR requirement document, ISO 14064-2 and the applied methodology.
2. Where there is not a pre-approved methodology available, project proponents may either:
    a. Develop a new methodology or

b. Follow the requirements of ICR requirement document and ISO 14064-2 in developing the project.

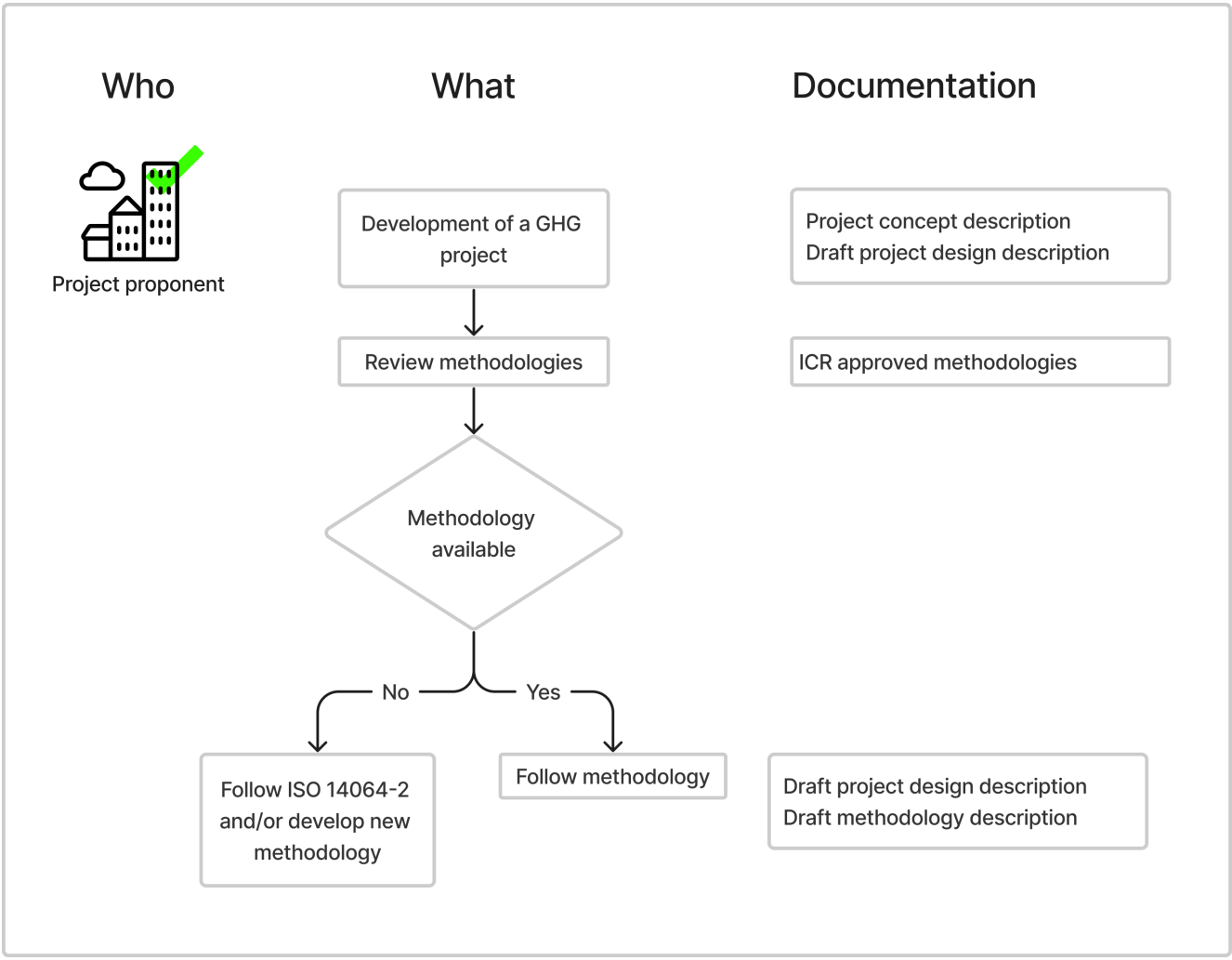


Figure 1: Project origination with ICR

1. ICR maintains an approved list of methodologies on its documentation site, currently featuring methodologies active within the Clean Development Mechanism (CDM). The application of these methodologies is designed to ensure compliance with both ISO 14064-2 standards and the specific requirements outlined in the ICR requirements document. This approach facilitates the alignment of project activities with established international guidelines and ICR's own criteria, ensuring that projects contribute effectively to greenhouse gas emission mitigations with verified environmental integrity.

2a. In instances where a pre-approved methodology is not available, proponents may develop a new methodology in accordance with the ICR methodology requirements and the ICR methodology approval process. Presently, there are five methodologies under formal development. For more information on these methodologies and to participate in the public consultation process, interested parties are directed to visit the ICR's public consultation page. This process ensures that new methodologies are rigorously evaluated and meet the high standards set by ICR before being adopted for use in projects, thereby facilitating innovation and expansion of the project scope within the ICR

program. The ICR methodology requirements stipulate the following:

[Methodologies shall encourage ambition over time; encourage broad participation; be real, transparent, conservative, credible, and below 'business as usual'; avoid leakage where applicable; recognize suppressed demand. Methodologies shall include relevant assumptions, parameters, data sources, and key factors.

Methodologies shall also consider uncertainty, leakage, policies and measures, and relevant circumstances, including social, economic, environmental, and technological circumstances, and address reversals where applicable.

Methodologies may be developed by project proponents, stakeholders, or ICR. Methodologies shall be validated by a VVB accredited for the sectoral scope the methodology applies to and be approved by ICR through the ICR methodology approval process, confirming its conformity to the ICR requirement document, the requirements herein, and ISO 14064-2. Methodologies shall demonstrate how they meet the requirements in this document and ISO 14064-2 at a methodology level. Methodologies shall be written clearly and concisely.]

Further under validation of the methodology the ICR methodology requirements stipulate the following.

[Validation of methodologies is the process of evaluating the proposed new methodology and its reasonableness of assumption, limitations, and methods included with its application and how it will support a statement of the outcome of the implementation of a project and its activities based on its application. Further evaluation of its conformity to ISO 14064-2, the ICR methodology requirements, and the ICR requirement document. All proposed methodologies are subject to validation of the proposed new methodology and the PDD developed following section 5.]

And

[Validation involves determining if the proposed methodology is eligible to generate GHG emission mitigation outcomes when applied. Validation shall be conducted according to ISO 14064-3 and ISO 14065. The validation report shall be made public.

Validation of the methodology may be in conjunction with validation of a PDD and verification of mitigation outcomes.]

And

[The validation process shall follow the requirements in ISO 14064-3. The criteria for validation are ISO 14064-2, the requirements herein, and applicable requirements from the ICR requirement document. During methodology assessment, VVBs need to assess whether the methodology conforms to the validation criteria with the establishment of criteria and procedures ensuring conservativeness and scientific integrity.

Methodology assessment requires background research, review of documentation, and interviews with experts and key stakeholders to determine whether the criteria and procedures established in the methodology conform to requirements and principles set out in the ICR requirement document and good practice standards1 and the requirements herein. VVBs need to consider underlying assumptions and approaches used in the methodology and assess whether and how the methodology incorporates relevant scientific and sector-specific considerations.

VVBs need to consider that methodologies shall be written in a manner that provides a prescriptive set of criteria and procedures that projects can apply and be assessed by VVBs to minimize subjective interpretation by project proponents applying the methodology and VVBs assessing projects. This includes using precise language, avoiding vague terminology, and ensuring the application and proper use of the keywords "can," "shall," "should," and "may.]

In the ICR methodology approval process it is stipulated that methodologies shall undergo public consultation.

[ICR publishes the proposed new methodology documentation on the ICR website for 28 days for consultation with stakeholders and the public on the proposed new methodology. In collaboration with ICR, the methodology developer may host a presentation of the proposed new methodology. Comments shall be submitted to

admin@carbonregistry.com, and respondents shall provide their name, organization, country, and email address. When the public consultation has ended, ICR provides comments received to the methodology developer and the VVB assessing the methodology. The methodology developer shall respond to all comments either by updating the methodology or demonstrating the insignificance or irrelevance of the comment. All adjustments shall be resubmitted to the VVB to assess the revision of validation.]
See further in the ICR methodology approval process.

2b. Proponents have the option to design projects that directly demonstrate conformity to ISO 14064-2 and the ICR requirements document. This approach involves integrating methodological components within the project's documentation and/or relying on good practice guidance e.g. methodologies from other programs, which is particularly advantageous for innovative solutions where applicability conditions and monitoring techniques are yet to be fully established or where methodologies are too restricted for application. Opting for this strategy can expedite the project's engagement with VCMs by excluding the need for separate methodology development, ensuring the project aligns with the rigorous requirements from ISO 14064-2 and the ICR requirements.

Adopting this approach streamlines the process, allowing for quicker access to VCMs under the assurance that the project meets strict criteria set by ISO 14064-2 and ICR. It necessitates that the VVB conducts a thorough assessment of the methodological components utilized within the project and evaluates the project's overall compliance with the established criteria and procedures, as well as the overarching criteria of the ICR program. This ensures a comprehensive review process, guaranteeing the project's environmental integrity and contributions to emission mitigations are verified to meet international standards and specific ICR requirements.

See:
ISO 14064-2
ICR requirement document
ISO 14064-3
ICR validation and verification specifications
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com)

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

All processes and requirements for methodology development are available on the ICR website, https://carbonregistry.com/templates/ under ICR Templates and Documentation. The program's process for developing new methodologies is published under ICR Procedures, titled ICR Methodology Approval Process. Further, all documentation needed for the documentation of the methodology development subject to the approval process is published under templates, i.e. Methodology Description and Concept Note.

In this way, all documentation and guidelines are provided for any project proponent aiming to develop a new

methodology with structural integrity and apply for approval by ICR.

2023 – application

N/A

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

The documentation was improved and moved to a new domain to make it more accessible, and with improved version history using Gitbook.

All documentation relating to the ICR program is available on ICR documentation page available using the following link. https://documentation.carbonregistry.com/documentation/

The methodology requirements and methodology approval process can be found under the methodology development section

1. Methodology Development – ICR Program (carbonregistry.com)
2. Criteria – ICR Program (carbonregistry.com)
3. Procedural – ICR Program (carbonregistry.com)

Templates for concept notes and methodologies are now in methodology development section
Templates – ICR Program (carbonregistry.com)

And template for methodology validation is available under validation and verification section
Templates – ICR Program (carbonregistry.com)

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*)

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Currently, ICR allows project-based activities.

Proposed revisions: Program of Activities.
ICR is developing criteria for program of activities (PoA). ICR estimates that the ICR program revision outlining criteria for PoA will be published in Q2 2022, subject to consultation with the PAMAP and final approval of the ICR Board.

2023 – application

ICR allows project-based activities and grouped projects (program of activities). ICR also manages a jurisdictional program developed by the Icelandic Forestry Service called Forest Carbon Code that is based on the UK Woodland Carbon Code. Specific requirements for grouped projects are in section 5 of ICR requirement document. Under section 5 in the ICR requirement document additional requirements for grouped projects are outlined.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

In late 2023 ICR issued a revision of the ICR requirement document, now version 5, and ICR definitions, now version 2. In section 5 improved clarity is provided relating on multiple project activities and distinction on bundling of project activities and grouping of project activites. These are defined in ICR definitions as the following.

- **Bundled project** means a set of multiple climate initiatives that combines multiple project activities into one comprehensive project.
- **Grouped project** means a climate project where additional instances of project activities, which meet pre-established eligibility criteria, may be added subsequent to project validation.
- **Multiple project activities** mean several project activities, representing a bundled or grouped project.

The full contents of these procedures can be found using the following publicly available weblinks.

a) ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)
b) ICR Definitions v2.0 - ICR Program (carbonregistry.com)

Summarize the eligibility criteria for each type of offset activity (e.g., which sectors, project types, and geographic locations are covered): (*Paragraph 2.2*)
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Projects leading to mitigation of climate change, which follow an approved methodology covering the sectoral scopes listed below, are eligible. All projects shall conform to all ICR Requirement Document, ISO 14064-2, and applicable requirements of approved methodology. The following sectors covered are listed in the ICRs Approved Methodologies document:

1 Energy industries (renewable-/non-renewable sources)
2 Energy distribution
3 Energy demand
4 Manufacturing industries
5 Chemical industries

6 Construction
7 Transport
8 Mining/mineral production
9 Metal production
10 Fugitive emissions from fuels (solid, oil and gas)
11 Fugitive emissions from production and consumption of halocarbons and sulphur hexafluoride
12 Solvent use
13 Waste handling and disposal
14 Afforestation and reforestation
15 Agriculture
16 Carbon Capture and Storage/Carbon Removal

Projects throughout the world are eligible to be registered with ICR if they comply with the ICR Requirement Document, requirements of ISO 14064-2, and the requirements of the applied methodology. Project proponents shall demonstrate the applicability of projects with regards to the requirement herein and the requirements of ISO 14064-2 if a methodology is applied in other geographic locations than their applicability.

Projects may be located in any part of the world, assuming the project is not required by a statutory requirement in the host country and complies with all applicable statutory requirements. Compared to their approved baseline and application of an approved methodology, projects shall deliver real, measurable, and additional climate mitigation outcomes.

In order to avoid double accounting, projects shall not be included in any other voluntary or compliance GHG program. Also, if the project boundary overlaps with another GHG program of a similar nature, the project proponent shall demonstrate that there is no double accounting of impacts completing project design description and at validation and verification.

2023 - application

Projects leading to mitigation of climate change, in all geographic regions, covering the sectoral scopes listed below, are eligible. All projects shall conform to all ICR requirement document, ISO 14064-2, and where applicable, requirements of approved methodology. The following sectors covered are listed in the ICRs approved methodologies document:

1 Energy industries (renewable-/non-renewable sources)
2 Energy distribution
3 Energy demand
4 Manufacturing industries
5 Chemical industries
6 Construction
7 Transport
8 Mining/mineral production
9 Metal production
10 Fugitive emissions from fuels (solid, oil and gas)
11 Fugitive emissions from production and consumption of halocarbons and sulphur hexafluoride
12 Solvent use
13 Waste handling and disposal
14 Afforestation and reforestation
15 Agriculture
16 Carbon Capture and Storage/Carbon Removal

Projects are eligible to be registered with ICR if they conform to the ICR requirement document, requirements of ISO 14064-2, and where applicable the requirements of applied methodology. Projects may be located in any part of the world, assuming the project is not required by a statutory requirement in the host country or if statutory requirements are systematically not enforced and complies with all applicable statutory requirements. Compared to their approved baseline and application of an approved methodology, projects shall deliver real, measurable, and additional climate mitigation outcomes.

In order to avoid double counting, projects shall not be included in any other voluntary or compliance GHG program or not issue environmental instrument for the same monitoring period as issued with ICR. If project boundary overlaps with another GHG program of a similar nature, the project proponent shall demonstrate that there is no double counting of impacts completing project design description subject to validation and verification.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
N/A

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*)
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR´s eligibility criteria are described in section 4 and further in 4.3 in the ICR Requirement Document. Projects that follow an approved methodology leading to climate change mitigation are eligible. All projects shall conform to all requirements of the ICR Requirement Document, ISO 14064-2, and applicable requirements of the applied methodology.

Approved methodologies are listed in the ICR Approved Methodologies document available on ICR website: https://carbonregistry.com/templates/.

All projects validated and verified according to an approved methodology are accepted if projects conform to the ICR Requirement Document's current version and the applied methodology.

Approved methodologies are:

- Methodologies, modules, and tools valid under the Clean Development Mechanism, Verified Carbon Standard, and American Carbon Registry.
- Methodologies, modules, and tools developed by ICR and approved through the Methodology development process described ICR Methodology Approval Process.
- New methodologies, modules, and tools developed by Project proponents and approved through the ICR Methodology Approval Process.

All processes and requirements are publicly available on the ICR website: https://carbonregistry.com/templates/

2023 – application

ICR´s eligibility criteria are described in section 3 and further in 3.3 in the ICR requirement document. All projects shall conform to all requirements of the ICR requirement document, ISO 14064-2, and requirements of the applied methodology where applicable. Approved methodologies are listed in the ICR approved methodologies document available on ICR website: https://carbonregistry.com/explore-our-program/

Projects validated and verified following an approved methodology are eligible if they conform to the current version of this document and the current version of the applied methodology. Approved methodologies are:

- Methodologies, modules, and tools valid and active under the Clean Development Mechanism.
- Methodologies, modules, and tools developed by ICR and approved through the methodology approval process.
- New methodologies, modules, and tools developed by project proponents and approved through the methodology approval process.

All processes and requirements are publicly available on the ICR website: https://carbonregistry.com/explore-our-program/

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
In late 2023, ICR issued a revision of the ICR requirement document, which is now version 5. After 1.1.2024 new projects with a start date pre 1.1.2020 are not eligible for registration.
Now all documentation relating to the ICR program is publicly available on ICR documentation page using the following link.

https://documentation.carbonregistry.com/documentation/

The ICR requirement document is publicly available using the following link:

ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)

Question 3.3. Offset credit issuance and retirement procedures

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Procedures referred to in the a) – e) are publicly available in ICR Requirement Document and ICR Process Requirements:

a) ICR has procedures in place defining how offset credits are issued.

The registration and issuance process are described in section 4.4. in the ICR Process Requirements document. Further, the specific process regarding the issuance of ICCs is described in subsection 4.4.5, Issuance of ICCs. This section comprises several items explaining the procedure, accompanied by a flowchart depicting the process steps and documentation required throughout the different steps. Among others, section 4.4.5 describes ex-ante issuance of inactive credits to support funding and upscaling of climate action, adjustment account, pre-verification issuance of maximum 60%, incremental issuance, cancellation of credits, and lists for what documentation are required during finalization of registration, in the case of deviation in a project and in the case of a renewed crediting period. See flowchart below.

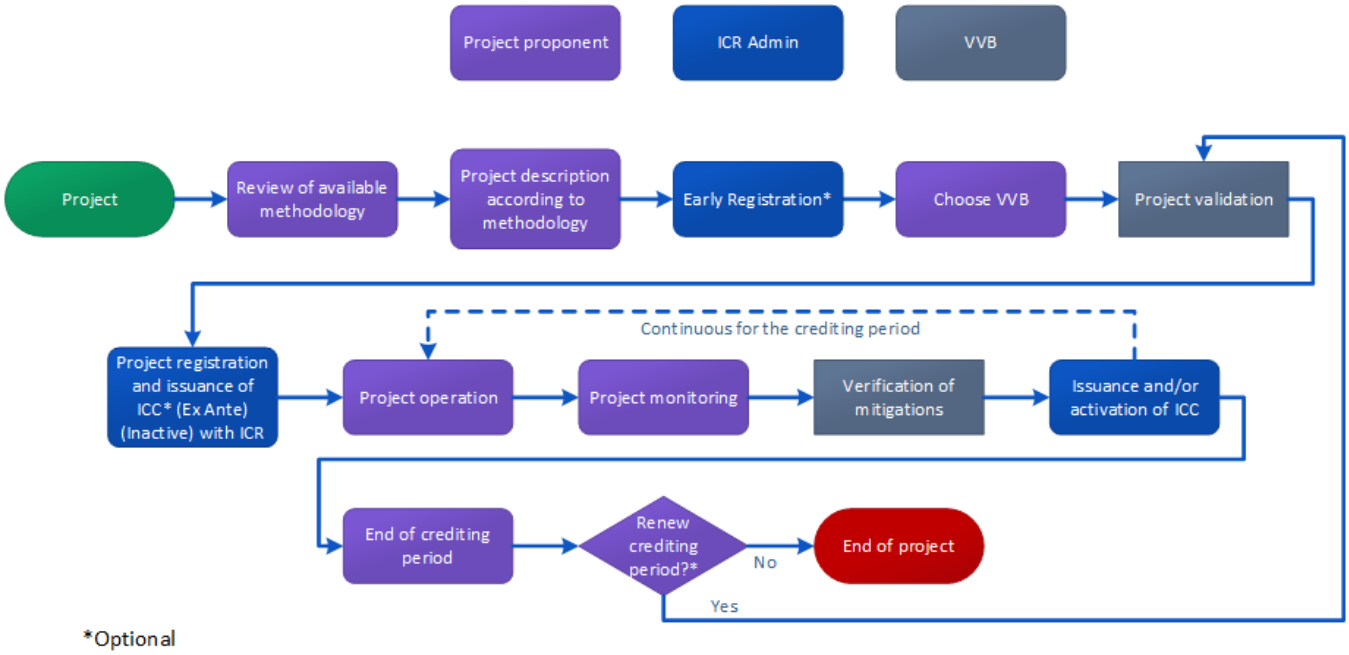


Figure 3: Issuance process

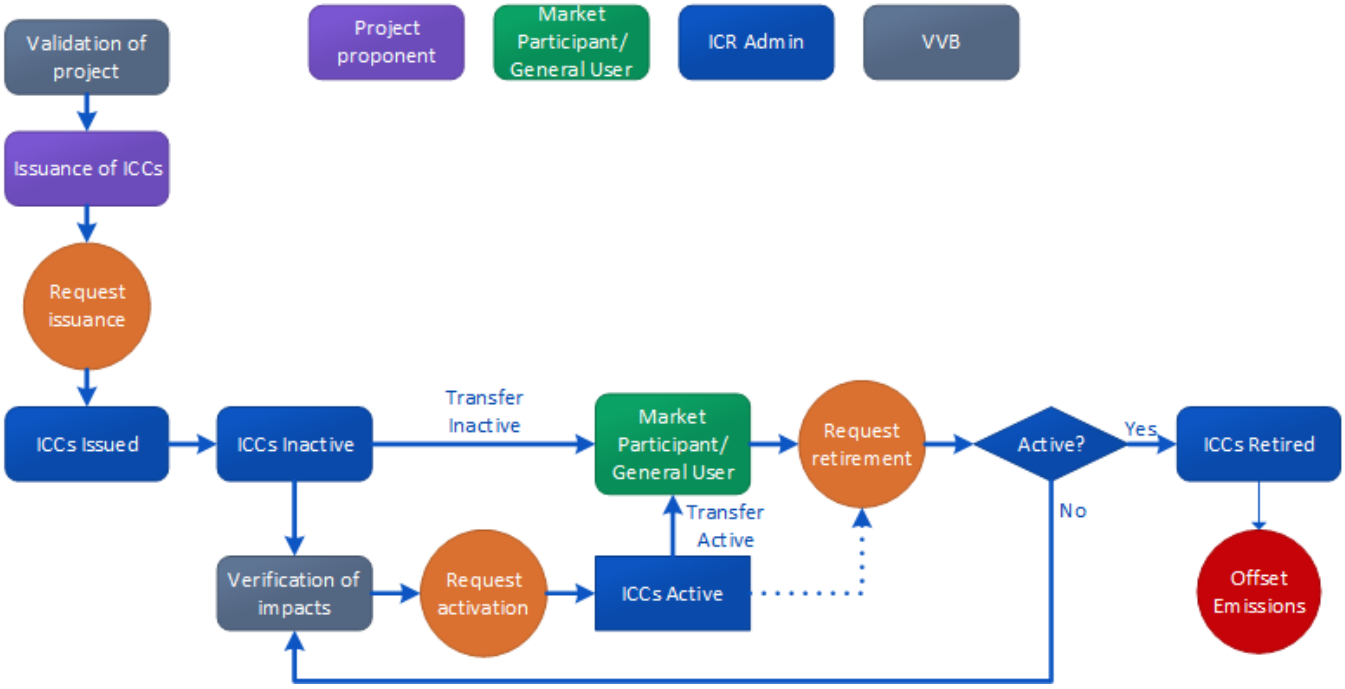


Figure 4: Issuance process inactive/active

b) ICR has procedures in place defining how offsetting of credits are Retired/Cancelled.

ICRs procedure for retirement and cancellations of ICCs are described in section 4.6. in ICR´s Process Requirements Document. In section 4.6. the process steps of retiring and cancelling ICCs is depicted, including the required documentation in the different steps.

c) ICR has procedures defining how offsetting of credits is subject to discounting.

ICR has addressed discounting of carbon offsets by establishing buffer and adjustment accounts for all projects granted issuance of ICCs. Such accounts are a measure addressing the risk of non-permanence of a project's mitigation outcome.

> [*A proportion of expected GHG Emission Mitigations shall be transferred in a Project Adjustment Account to protect projects from unexpected reductions in carbon stocks or increases in emissions unless the Project proponent can demonstrate that the risk of reversal associated with the project intervention is avoided*]

ICR sets out requirements towards risk adjustment due to non-permanence for AFOLU and CDR projects described in section 5.14 in the ICR Requirement Document and section 6 in ICR Process Requirement.

> [*If not explicitly addressed in the applied methodology, the deposit to the AFOLU Buffer Account shall be 20%, and for the CDR Buffer Account shall be 5% of issued ICCs…. project proponents shall never hold less than 10% of issued and active ICCs in the AFOLU Buffer Adjustment Account and 1% on the CDR Buffer Adjustment Account.*]

Further, there are requirements for non-performance of projects. These requirements are described in section 6 in ICR Requirement Document.

[requiring projects proponent to set aside non-tradable adjustment ICC credits. This is completed in order to cover unforeseen losses in carbon stocks and unforeseen obstacles in the operations of projects. The adjustment credits from all projects are held in a single pooled Adjustment account administered by ICR. Adjustment ICCs can be drawn upon in the event of a reversal in carbon stocks or if projects fail to produce real Mitigation outcomes in any individual project where ICCs have been retired or have been transferred in an Inactive state.]

d) ICR has procedures defining the length of crediting period(s).

In ICR´s Requirement Document, Section 4.4, *Start Date and Crediting*, the details of this procedure are described in the first two paragraphs of the section.

[*Crediting periods for all project types except AFOLU is ten years or a conservative estimate of the technical lifetime of the installed technologies or implemented measures and associated impacts … AFOLU projects shall follow the same crediting period as other methodologies if not explicitly specified in the methodology.*]

e) ICR has procedures in place defining whether the crediting period is renewable:

In ICR´s Requirement Document, Section 4.4*, Start Date and Crediting*, the details of this procedure are described in the last paragraph of the section.

[*Project proponents may apply at the end of the current crediting period for a renewal of the crediting period by complying with all future requirements, re-evaluating baseline scenarios using tools and methodologies in effect at the time of renewal of crediting period validated by approved VVB. There is no limit on renewals of crediting periods for Carbon Dioxide Removal (CDR) projects as long as the Project fulfils all then effective requirements and is deemed additional. The crediting period can be renewed once for carbon avoidance or reduction projects, as long as the Project fulfils all then effective requirements herein and ISO 14064-2*.]

2023 – application

Procedures referred to in the a) – e) are publicly available in ICR requirement document and ICR process requirements:

a) ICR has procedures in place defining how credits are issued.

The registration and issuance process are described in section 2.4. in the ICR process requirements document. Further, the specific process regarding the issuance of ICCs is described in subsection 2.4.5*, Issuance of ICCs*. This section comprises several items explaining the procedure, accompanied by a flowchart depicting the process steps and documentation required throughout the different steps. Among others, section 2.4.5 describes ex-ante issuance of inactive credits to support funding and upscaling of climate action, adjustment account, pre-verification issuance of maximum 50%, incremental issuance, cancellation of credits, and lists for what documentation are required during finalization of registration. For ex-post issuance, the verification report establishes the volume of credits eligible for issuance. See flowchart below.

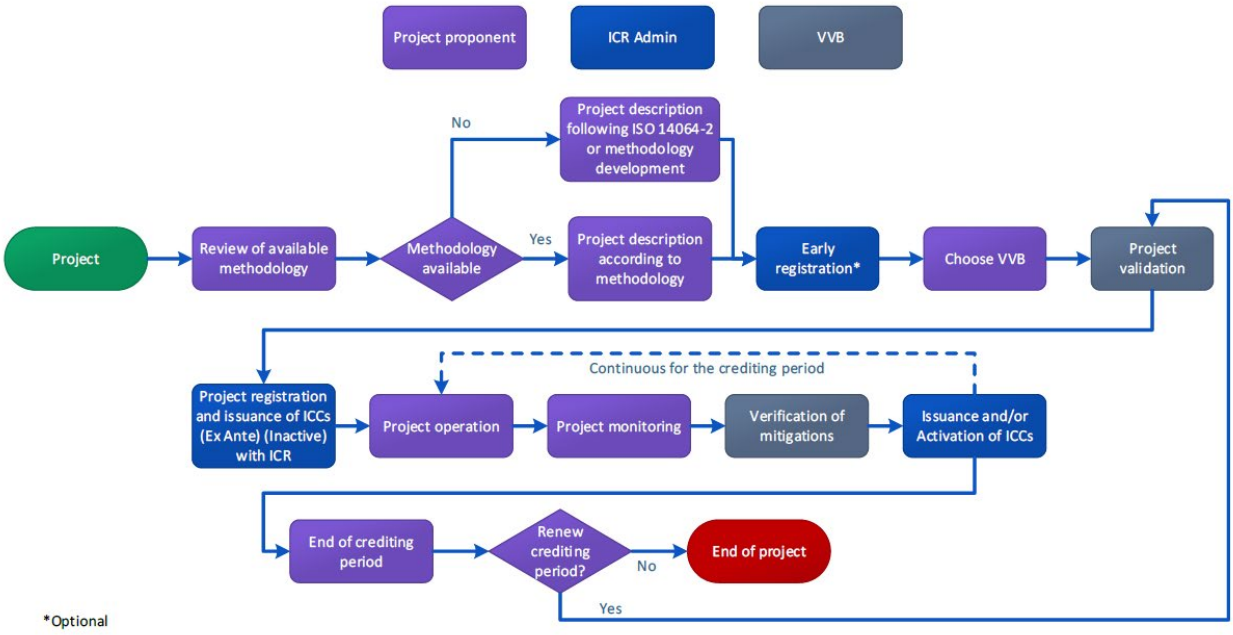


Figure 3: Issuance process

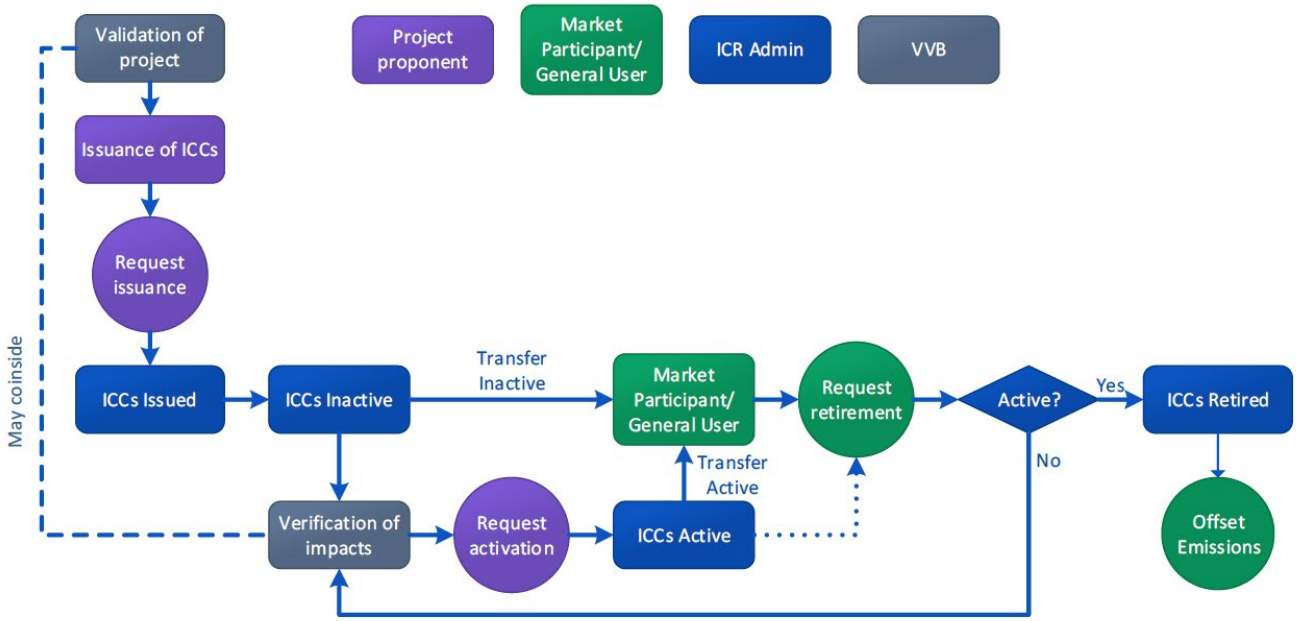


Figure 4: Issuance process inactive/active

b) ICR has procedures in place defining how offsetting of credits are retired/cancelled.

ICRs procedure for retirement and cancellations of ICCs is described in section 2.6. in ICR´s process requirements document. In section 2.6. the process steps of retiring and cancelling ICCs is depicted, including the required

documentation in the different steps. ICR defines retirement and cancellation separately in the ICR definitions. Retirement means permanent removal of ICCs from circulation. The term retirement applies to the use of a carbon credit by an entity to meet voluntary commitments or compliance obligations. The term is distinct from cancellations. Cancellation means a permanent transfer of an ICC from circulation in the ICR registry system for purposes other than retirement.

c) ICR has procedures defining how offsetting of credits is subject to discounting.

ICR has addressed discounting of carbon offsets by establishing buffer and adjustment accounts for all projects granted issuance of ICCs. Such accounts are a measure addressing the risk of non-permanence of a project's mitigation outcome and non-performance of project activities.

> [*The risk of non-permanence and performance of projects registered with ICR is addressed with an adjustment account held and operated by ICR. When projects issue ICCs ex-ante, they shall deposit 2% of issued ICCs to the adjustment account irrespective of sector and project type. For reversal events and/or non-performance, when the project proponent cannot compensate for the reversal or performance, ICR cancels ICCs from the adjustment account on a first-in, first-out basis.*]

ICR sets out requirements towards risk adjustment due to non-permanence for AFOLU and CDR projects described in section 4.8.2 in the ICR requirement document and section 4 in ICR process requirement.

> [*A proportion of expected GHG emission mitigations shall be transferred to an adjustment account to protect projects from unexpected reductions in carbon stocks or increases in emissions. The project proponent shall establish and apply criteria, procedures, and/or methodologies to assess the risk of a reversal of GHG emission mitigations. A reversal risk assessment shall address the risk of non-permanence, including both general and project-specific risk factors. General risk factors include financial, technical, management, rising land opportunity costs, regulatory and social instability, and natural disturbances.*
>
> *Project-specific risk factors may vary by project type. Project proponents may use a relevant current good practice guidance risk assessment tool or rely on ISO 31000 to assess the non-permanence risk.*
> *The number of credits to be deposited to the AFOLU and CDR pooled buffer adjustment account is determined by the risk assessment.*
>
> *Irrespective of the risk assessment, the project proponents shall never deposit less than 10% of issued ICCs in the AFOLU buffer adjustment account and 1% in the CDR (non-AFOLU) buffer adjustment Account.*]

d) ICR has procedures defining the length of crediting period(s).

In ICR´s requirement document, Section 3.4, *Start Date and Crediting*, the details of this procedure are described in section 3.2.4. ICR segregates projects into four categories. Projects with start date prior to 1.1.2021 and with start date after 1.1.2021. Further projects who involve carbon dioxide removals (CDR) and projects that involve avoidance or reductions.

	Avoidance/ reduction	Credit period renewable	CDR	Credit period renewable
<1.1.2021	10 yrs.	No	15 yrs.	2x
>1.1.2021	5 yrs.	2x	15 yrs.	2x

e) ICR has procedures in place defining whether the crediting period is renewable:

In ICR´s requirement document, Section 4.4*, Start Date and Crediting*, the details of this procedure are described in section 3.4.2. See also table above.

[Project proponents may apply at the end of the current crediting period for a renewal of the crediting period, subject to conformity to all future requirements, update of the PDD, re-evaluating baseline scenarios using tools and methodologies in effect at the time of renewal, and validation by an approved VVB.]

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

In late 2023 ICR issued a revision of ICR definitions, now version 2 and the ICR requirement document, now version 5, and early 2024 ICR issued a revised version of ICR process requirements also now in version 5..

Now all documentation relating to the ICR program is available on ICR documentation page.
https://documentation.carbonregistry.com/documentation/

a) The registration and issuance process are described in section 3 in the ICR process requirements document. Further, the specific process regarding the issuance of ICCs is described in subsection 4, Issuance. This section comprises several items explaining the procedure, accompanied by a flowchart depicting the process steps and documentation required throughout the different steps. Section 4.2 describes ex-ante issuance, section 4.3 ex-post issuance, section 4.4 adjustment and buffer account requirements, and lists for what documentation.

- Ex-ante ICCs are issued based on projected or expected GHG emission mitigations that will occur in the future. They are issued before the actual impacts, based on predictive calculations or models of the project's expected impact. Ex-ante ICCs become ex-post ICCs subject to successful verification of impacts.

- Ex-post ICCs are issued after the GHG emission mitigations have occurred and been verified. These credits represent real, measurable GHG emission mitigations that have been achieved and verified, confirming the project's actual impact.

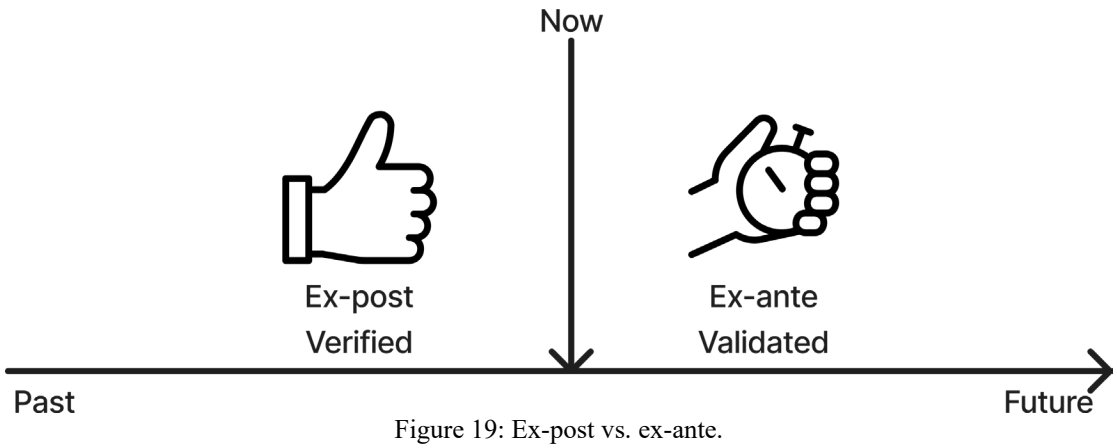


Figure 19: Ex-post vs. ex-ante.

Issuance of ICCs, either ex-ante (Figure 20) or ex-post (Figure 21) may generally be described according to the following diagram.

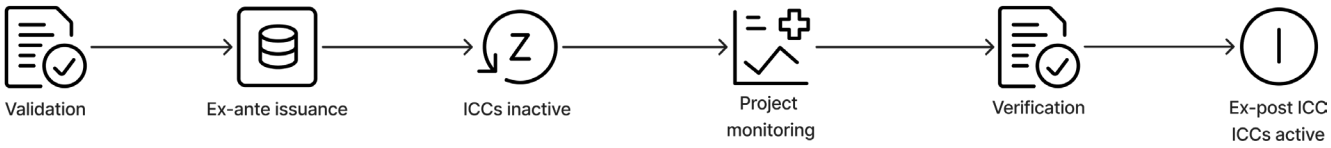


Figure 20: Ex-ante ICC issuance.

Figure 21: Ex-post ICC issuance.

Ex-ante issuance refers to the issuance of ICCs before impacts, and ex-post issuance refers to issuance after verification of real impacts. Therefore, ex-ante ICCs have vintages in the future, but ex-post vintages in the past.

Issuances are either post-validation but pre-monitoring (ex-ante) or post-verification (ex-post).

The ICR registry displays the status of every ICC that has been issued. The ICR allows projects that have been validated to issue ex-ante ICCs. ICCs may have a different status that represents the attribute of the credit. ICCs may be inactive (ex-ante), active (ex-post), retired, or cancelled. Detailed definition on different statuses may be found using the following publicly available link: https://documentation.carbonregistry.com/documentation/icr-program/definitions/icr-definitions-v2.0

The project proponent may request partial or complete issuance of ICCs in the registry, subject to limitations.

The full contents of these procedures can be found in section 3.4 in the ICR requirement document using the following publicly available link.

ICR Process Requirements v5.0 - ICR Program (carbonregistry.com)

b) ICR's procedure for retirement and cancellations of ICCs is described in section 5 of ICR´s process requirements document. In section 5.2. the process steps of retiring and 5.3 cancelling ICCs is depicted, including the required documentation in the different steps. Also details about retirement and cancellations may be found in ICR registry user guide.

See:
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com)
Registry user guide - ICR Program (carbonregistry.com)

c) In section 4.4, improved details of ICR process requirements have been provided for any discount due to the non-performance of projects and non-permanence.

Information about adjustments (discounting) is now available in ICR requirement document in sections 3.5 and 4.8.2.

[*The risk of non-performance of projects registered with ICR is addressed with an adjustment account held and operated by ICR. Projects issuing ICCs ex-ante, not covered by an insurance for non-performance risk shall deposit 2% of issued ICCs to the adjustment account irrespective of sector and project type. When the project proponent cannot compensate for the reversal or performance, ICR cancels ICCs from the adjustment account on a first-in, first-out basis. Project-based non-permanence risk adjustment is discussed in section 4.8.2.]*

[*The project proponent shall define the permanence of the GHG emission mitigations. However the minimum term of permenanence shall be 50 years after the end of the last crediting period.*

Project proponent implementing AFOLU projects and CDR subject to a risk of reversal shall deposit non-tradable buffer credits to cover unforeseen losses in carbon stocks.

A proportion of expected GHG emission mitigations shall be transferred to a buffer adjustment account to protect projects from unexpected reductions in carbon stocks or increases in emissions. The project proponent shall establish and apply criteria, procedures, and/or methodologies to assess the risk of a reversal of GHG emission mitigations. A reversal risk assessment shall address the risk of non-permanence, including both general and project-specific risk factors. General risk factors include financial, technical, management, rising land opportunity costs, regulatory and social instability, and natural disturbances. Project-specific risk factors may vary by project type. Project proponents may use a relevant current good practice guidance risk assessment tool[7] or rely on ISO 31000 to assess the non-permanence risk.

The number of credits to be deposited to the AFOLU and CDR pooled buffer adjustment account is determined by the risk assessment.

Irrespective of the risk assessment, the project proponents shall never deposit less than 10% of issued ICCs in the AFOLU buffer adjustment account and 1% in the CDR (non-AFOLU) buffer adjustment account.

Where an event occurs that is likely to result in a reversal event, the project proponent shall notify ICR within 30 days of discovering the likely event. Where instruments have previously been issued, the proponent shall prepare a reversal event report including a conservative estimate of the reversal of previously verified GHG emission mitigations due to losses in carbon stocks from the project, based on monitoring of the area affected by the event, and submit to ICR.

At the next verification subsequent to the loss event, the monitoring report shall restate the loss from the loss event and calculate net GHG emission mitigations for the monitoring period in accordance with the quantification procedures provided in the PDD.]

Procedures about adjustment accounts are now available in ICR process requirements, see section 4.4.

Projects subject to reversal risk are subject to deposit to ICR buffer holding account and projects subject to non-performance subject to deposit to ICR adjustment holding account. Both are publicly available on ICR registry.

- **Buffer account**
- **Adjustment account:**

Buffer account

The number of ICCs to be deposited in the pooled buffer account is determined by non-permanence risk following the requirements in the ICR requirement document. The non-permanence risk rating and this percentage are applied to the project's carbon stocks verified to determine the number of ICCs to be deposited in the ICR pooled buffer account.

The full contents of the buffer account procedure can be found in section 4.4.1 using the following publicly available link . [ICR Process Requirements v5.0 - ICR Program (carbonregistry.com)]

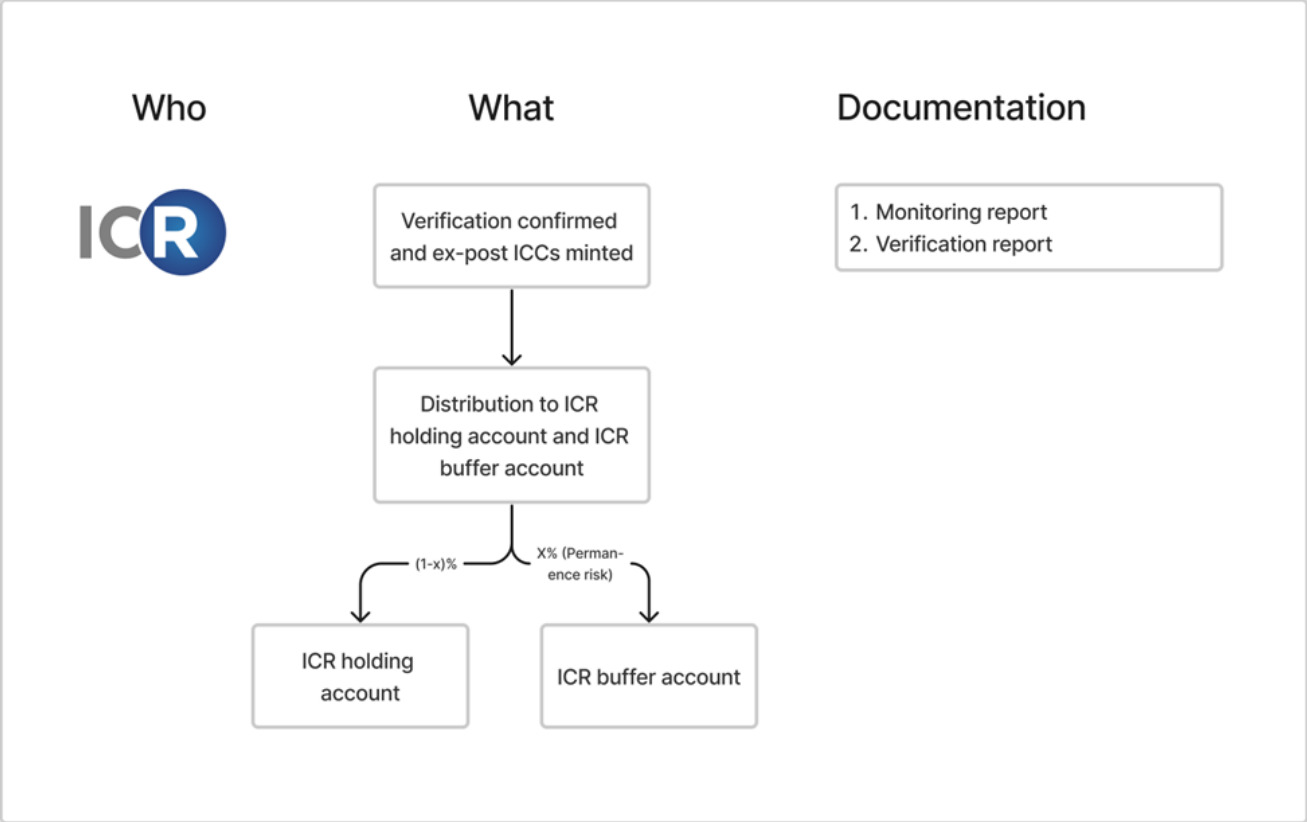


Figure 25: Buffer allocation procedure.

Adjustment

Project proponents shall deposit adjustment credits into the adjustment account following this process.

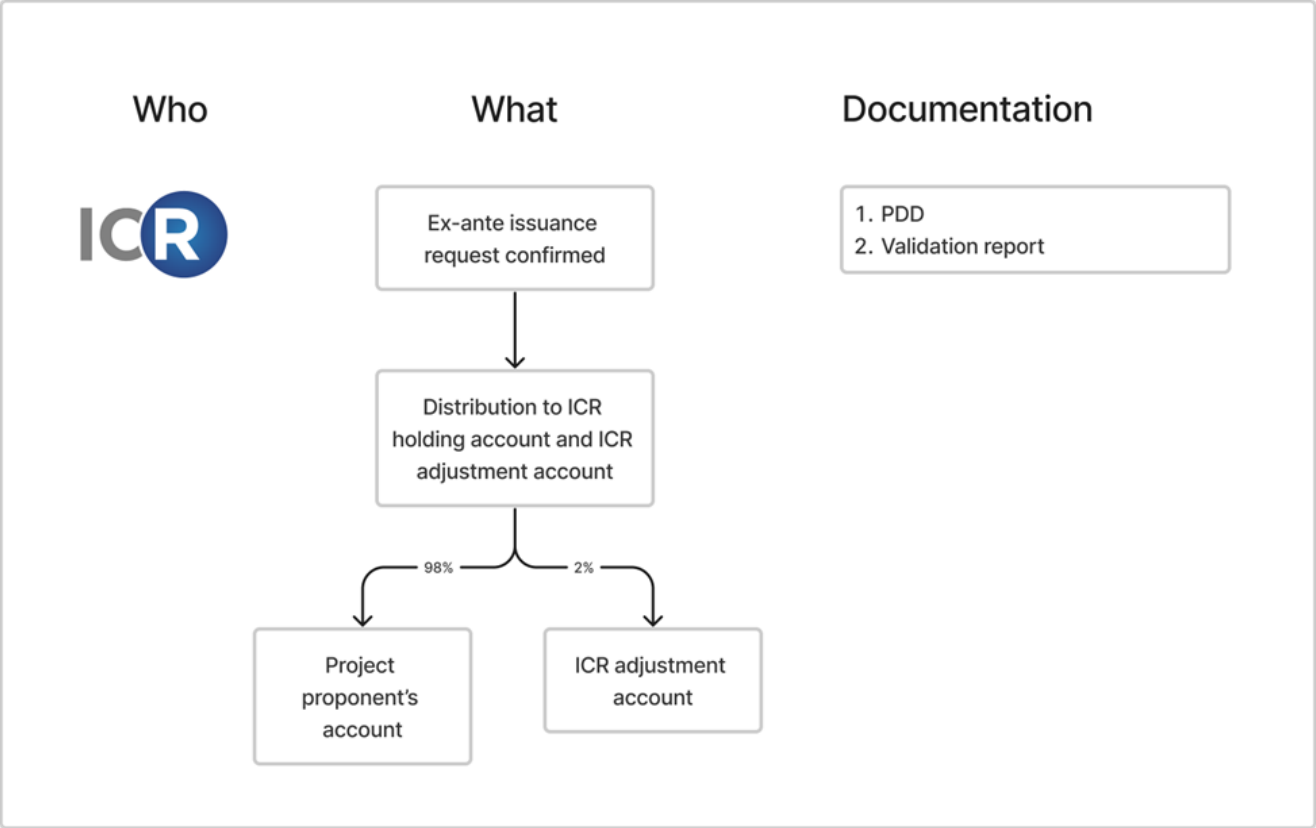


Figure 26: Adjustment account allocation.

1. The number of credits to be deposited in the adjustment account is 2% of each issuance of ICCs, irrespective of the timing of issuance prior to verification.
2. Adjustment credits are essentially considered ICCs but are only eligible for compensation for non-performance events. Adjustment credits are not subject to any issuance fees.
3. At verification events, they are converted to ex-post ICCs and can be used to compensate for non-performance.
4. At the end of each project crediting period, the project proponent can apply for reimbursement of deposits of adjustment credits. They are reimbursed by ICR's sole discretion and with respect to the status of the adjustment account and cancellations made by the ICR due to non-permanence and/or non-performance.

The full contents of the adjustment account procedure can be found in section 4.4.2 using the following publicly available link . ICR Process Requirements v5.0 - ICR Program (carbonregistry.com)

d) Requirements have materially not changed, publicly available using the following link:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)
Note however, related to crediting period, that after 1.1.2024 eligibility of projects to register with ICR now limits to projects with start date 1.1.2020 and later.

e) Requirements have materially not changed, publicly available using the following link:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)

Question 3.4 Identification and Tracking

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*):
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 – application

ICR´s registry platform is electronic and can be accessed through all internet-connected computers https://iceland.itmoregistry.net/. ICR´s registry platform is developed by Global Environmental Markets (GEM) https://www.gemglobal.com/. ICR licenses the registry technology with a license agreement for ten years and administers registrations of projects and credit issuances. The ICR administered the registry and is not outsourced to a third party.

2023 – application

ICR´s registry platform is electronic and can be accessed through all internet-connected computers www.app.carbonregistry.com. ICR´s registry platform is developed by Mojoflower ehf. (Mojoflower) www.mojoflower.io. The ICR administered the registry and is not outsourced to a third party.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Updated since the last application, the registry platform is now available at www.app.carbonregistry.com where users log into their accounts.

Information that is public can be accessed through the following link https://www.carbonregistry.com/explore and content is further organized into several key sections:

- **Projects**: Provides an overview of projects along with their registration status.
- **Methodologies**: Displays methodologies in a format akin to the CDM methodology booklet, offering detailed insights.
- **Sectors**: Gives an overview of the various sectors covered by the registry.
- **Credits**: Lists the credits that have been issued, including details on each.
- **Organizations**: Presents information on organizations holding a registry account, including optional details such as credit inventory, associated projects, and more.
- **Insights**: Features posts from organizations or projects, sharing updates or findings.

All information available publicly from projects is accessible on the platform.

Additionally, the registry's credit database leverages public blockchains for all credit issuances, transactions, and

retirements/cancellations, with data is publicly verifiable on TheGraph at https://thegraph.com/hosted-service/subgraph/skjaldbaka17/carbon-registry-main-test.

More details on how ICR employs public blockchains for credit issuance and transactions are provided on the ICR documentation page at https://documentation.carbonregistry.com/documentation/on-chain/how-it-works, offering a deeper understanding of the registry's operational framework.

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR has procedures in place to ensure that the program registry has the capability to transparently identify emissions units that will be deemed ICAO-eligible in all account types as issued credits may be labelled with additional benefits.

ICR uses a credit identifier scheme where the serialization of each credit represents ICR, project country, registry project, year of issuance, credit identifier, project issuance number, start serial number, and end serial number.

The identification of each credit is visible in the ICRs registry. For example, this can be seen under Credits (in the dropdown menu at the main page), where one can search for both credit serial ID and credit status, as well as scroll through the different registered projects where both serial number, project name, and type, issuance period start date, status, retirement reason, and quantity.

All procedures are described further in the Registry User Guidelines available on the registry platform.

b) ICR has procedures in place to ensure that the program registry **identifies and facilitates tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement**.

Credits can be transferred to another registry account holder or can be listed for sale on an exchange. The account holder must have an associated exchange account with details stored in their profile and/or have a registry account with the ICR. The beneficiary selects the credits to be transferred, the quantity, and the receiving account number to initiate the transfer process. The registry splits the serial numbering of the credits to reflect the correct number of credits transferred and the remaining credits.

All procedures are described further in the Registry User Guidelines available on the registry platform.

c) ICR has procedures to ensure that the program registry **identifies unit status, including retirement/cancellation and issuance status**.

After credits are issued, they are given a state which determines what actions can be performed with the credits, e.g. in-active credits may not be retired, and retired credits may not and cannot be transferred

Unit status of credits may be inactive, pending active, active, transferred-inactive, transferred active, sold, pending retired, retired, pending canceled, canceled, pending delist, and delist.

A full description of the different statuses is outlined in Appendix D, *Emissions Unit Programme Registry Attestation.*

d) ICR has procedures to ensure that the program registry assigns **unique serial numbers to issued units**.

The registry platform uses a credit identifier scheme where the serialization of each credit represents credit type, project country, project ID, vintage, instrument type, project issuance number, start serial number, and end serial number**.**

A full description of the different statuses is outlined in Appendix D, *Emissions Unit Programme Registry Attestation.*

e) ICR has procedures to ensure that the program registry identifies in serialization and accessible though publicly, each unique unit's country and sector of origin, vintage, and original (and, if relevant, revised) project registration date.

All credits are assigned a unique serial number that consists of Registry identifier, **project country, country code**, project id, **vintage**, instrument type, issuance number, and start and end serial number.

A full description of the serialization structure is outlined in Appendix D, *Emissions Unit Programme Registry Attestation.*

f) ICR has procedures to ensure that the program registry is secure with appropriate provisions in place.

The registry tech is designed to verify and approve participants, register projects, record the approval and issuance process of projects and associated instruments, store documentation, generate reports, and ultimately manage the lifecycle of instruments, including transferring from and to registry accounts and listing and delisting them on to exchange for sale.

Transparent Data Encryption is applied to the database, which provides a blanket of protection by encrypting all data held at rest within the database with AES-256 encryption, complying with ISO/IEC 18033-3:2010 standard for block ciphers for the purpose of confidential data protection. Implementing TDE also protects the database against

attackers or malicious users stealing backup files of the database and restoring them off-site, as these backup files are also encrypted.

All procedures are described further in the Registry User Guidelines available on the registry platform.

2023 - application

a) ICR has procedures in place to ensure that the program registry has the capability to transparently identify emissions units that will be deemed ICAO-eligible in all account types as issued credits may be labelled with additional benefits.

ICR uses a credit identifier scheme where the serialization of each credit represents credit identifier, project country, country code, project ID, sector, type, host-country attestation, vintage, start serial number, and end serial number. Further during registration and issuance of ICCs more information in captured that isn't reflected in the credit identifier. This information can be used to identify either projects that are deemed to be ICAO-eligible or vintages monitoring periods that represents mitigations that are ICAO-eligible.

The identification of each credit is visible in the ICRs registry. For example, this can be seen under Credits where one can search for both credit serial ID and credit status, as well as scroll through the different registered projects where both serial number, project name, and type, monitoring period start date, status, transfers, retirements, retirement comment, and quantity.
All procedures are described further in the registry user guide available on the registry platform.

b) ICR has procedures in place to ensure that the program registry **identifies and facilitates tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement**.

The registry identifies and facilitates tracking and transfer of credits ownership from issuance to cancellation/retirement. Credits can be transferred to another registry account or can be listed for sale on marketplaces. Project proponents select the account holder from a list of account holders or initiate transfer to an organization outside of the registry. The registry sends an automatic email to the counterparty stating they have been delivered credits they can claim to their account. That way all transfers are delivered and retired by the organization that does the underlying claim due to the retirement. Every transfer and retirements/cancellations are recorded on blockchain for immutable action on the ledger. This in turn allows the project proponent to monitor all credits issued and their status efficiently and effectively.

All procedures are described further in the Registry User Guidelines available on the registry platform.

c) ICR has procedures to ensure that the program registry **identifies unit status, including retirement/cancellation and issuance status**.

After credits are issued, they are given a state which determines what actions can be performed with the credits, e.g. in-active credits may not be retired (ex-ante), when mitigations have been verified credits may be issued as active or in-active credits be activated for the monitoring period of the verifications. Active credits may be retired and cannot be transferred or used further.

Unit status of credits may be inactive, active, retired, cancelled.

A full description of the different statuses is outlined in Appendix D, Emissions Unit Programme Registry Attestation, the ICR process requirements and user guide.

d) ICR has procedures to ensure that the program registry assigns **unique serial numbers to issued units**.

The registry platform uses a credit identifier scheme where the serialization of each credit represents credit identifier, project country, country code, project ID, sector, type, host-country attestation, vintage, start serial number, and end serial number. As issued on blockchain each project is assigned a token for each project and respective vintage which may be found on a public ledger, e.g. on Polygonscan. The use of specific token for each project and vintage reduces the need for assigning an individual number for each credit and a serial number in a database as the blockchain automatically tracks credits and ownership, status, etc., without the risk of units being duplicated or replicated on or outside the registry system.

A full description of the serialization is outlined in Appendix D, *Emissions Unit Programme Registry Attestation* the ICR process requirements and user guide.

e) ICR has procedures to ensure that the program registry identifies in serialization and accessible though publicly, each unique unit's country and sector of origin, vintage, and original (and, if relevant, revised) project registration date.

All credits are assigned a unique serial number that consists of registry identifier, **project country, country code**, project id, **sector**, host country attestation, **vintage**, type, and running number. The identifier doesn't identify the registration date. The registration date can be found on the projects' site or on the public ledger of the credit.

A full description of the serialization structure is outlined in Appendix D, *Emissions Unit Programme Registry Attestation* the ICR process requirements and user guide.

f) ICR has procedures to ensure that the program registry is secure with appropriate provisions in place.

Secure Authentication: The registry uses a strong authentication mechanism to protect user accounts. Depending on permission tiers our users may be required to use multi-factor authentication to add an extra layer of security, in addition that multi-factor authentication can be opt-in.

Encryption: Encryption for data in transit and at rest is implemented. Secure protocols, such as HTTPS, are used to encrypt data in transit. Data at rest is encrypted using technologies like AES. The system further offers encryption of privileged data.

Regular Backups: Data is backed up on a regular basis and securely stored via trusted 3rd party provider MongoDB to ensure recovery of data in the event of a disaster.

Monitoring and Logging: Monitoring and logging is implemented to detect security events and unauthorized access. Security information and event management (SIEM) system collects and analyses security events.

Access Control: Access controls are implemented to restrict access to sensitive data and system resources. Role-based access control (RBAC) is used to grant permissions to users based on their roles and responsibilities.

Patch Management: Software is up-to-date with the latest security patches to address known vulnerabilities on regular bases. Patch management process ensures that patches are deployed in a timely manner and may be enforced by third parties like Digital Ocean, Github or other trusted service providers.

Employee Training: Employees are trained on security best practices and their roles and responsibilities in protecting sensitive and confidential data.

Incident Response Plan: Incident response plan is in place to respond to security incidents. This plan includes procedures for identifying and containing security incidents, notifying affected parties, and restoring services as set forth in appendix D.

Vendor Management: Third-party vendors are required to have adequate security controls in place. Security requirements are included in contracts with regular security assessments stipulated.
Compliance: SOC2/ISO 27001, ISO 9001 certifications are planned and compliance with relevant security regulations, such as GDPR, CCPA, and HIPAA if applicable and certified by third party such as VANTA.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
In addition to information provided in last application:

Now all documentation relating to the ICR program is available on ICR documentation page.
https://documentation.carbonregistry.com/documentation/

Project proponents who wish to issue credits initiate a credit issuance request through the registry system. This request includes linking a monitoring and verification report. ICR admin official thoroughly reviews the reports, ensuring that the requested amount of credits aligns with the verified data. Based on this evaluation, the official either approves or declines the request.

Once the "mint new credits" request is approved, the registry carries out the required procedures to mint new tokens (credits) that correspond to the token ID of the project's contract. This minting process takes place on the blockchain, ensuring transparency and traceability. As a result, anyone can verify the issuance of new credits by examining the blockchain and confirming the updated token balances linked to the project.

The process utilizes public blockchains and the registry system to establish an auditable and transparent framework for issuing and validating carbon credits. By employing token IDs, data structures, and the oversight of ICR admin, the integrity, verifiability, and reliability of the issued credits are ensured.

It is important to note that registry relies on public blockchains as the sole authoritative record for registration of issued carbon credits. There is no centralized database for this purpose. Therefore, the credits that exist on the blockchain are the only ones that the ICR has officially issued.

a) Host country attestation is further defined in section 3.10 in the ICR requirement document along with section 3.8 on double counting, issuance and claiming:

   See:
   ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 3.8
   ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 3.10

   Additional information about serialization of credits is available in ICR process requirements. The serialization acknowledges host country attestation in the serialization see section 4.1 in the ICR process requirements.

[*Serial numbers play an important role in ensuring the integrity and traceability of carbon credits. Even though the tokenization of credits on chain ensures the uniqueness of a project and a credit, a credit serial number further serves as a consistent unique identifier assigned to each vintage of each project, representing a reduction, avoidance, or removal of CO2-e. The serial number ensures that each credit is distinct and traceable. Relying on serial numbers helps prevent double counting and fraud. It ensures that a specific carbon credit can be tracked throughout its lifecycle, from issuance to retirement, which is essential for maintaining credibility.*

The serialization of ICCs helps to see the credits' attributes and compare projects easily. The serialization structure is provided below.

Component	***Order***	***Type***	***Length***	***Range***	***Comment***
Credit identifier	*1*	*Letter*	*3*	*Text*	*Fixed value. Unique registry identifier. (ICC, FCC)*
Project Country	*2*	*Letter*	*3*	*ISO 3166-1*	*Three-letter country code for the project (e.g., Iceland is ISL).*
Project country dialing code	*3*	*Numeric*	*3*	*1-999*	*Three-digit country code for the project (e.g., Iceland is 354).*
Project ID	*4*	*Numeric*	*4*	*1-9999*	*Registry assigned identifier for the project, unique in the registry.*
Sector	*5*	*Numeric*	*2*	*1-16*	*Sectors from CDM*
Type	*6*	*Letter*	*1*	*A, R, H*	*Avoidance, Removal, Hybrid*
Host country attestation	*7*	*Numeric*	*1*	*1;0*	*1 = Yes, 0 = No attestation*
Vintage (Year)	*8*	*Numeric*	*4*	*0-9999*	*The vintage year of the credits.*
Multiple project activities	*9*	*Numeric*	*3*	*0-999*	*ID of a sub-project. If not multiple project activities, this identifier is not used.*

Example: *ICC-ISL-354-33-13-A-0-2022*
GHG program: *International Carbon Registry*
Project Country: *Iceland*
Dialing code: *354*
Project ID: *33*
Sector: *Waste handling and disposal*
Type: *Avoidance*
Host country attestation: *No approval for ITMO transfer.*
Vintage: *2022*
Multiple project activities: *Not a Multiple project activity.*]

See here:
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.1

User guide is available here:
Registry user guide - ICR Program (carbonregistry.com)

b) The registry's credit database leverages public blockchains for all credit issuances, transactions, and retirements/cancellations, with data verifiable on TheGraph accessible and auditable

More details on how ICR employs public blockchain for credit issuance and transactions are provided on the

ICR documentation page using this link.

When credits are transferred, they can either go to an already established account or the system will set up a new account for the users during the transfer process. The party getting the credits will get guidance on how to officially take ownership of them and go through the necessary Know Your Customer (KYC) and Know Your Business (KYB) procedures.

KYC/KYB policy and anti corruption compliance policy:
KYC/KYB Compliance Policy - ICR Program (carbonregistry.com)
Anti-Corruption Compliance Policy - ICR Program (carbonregistry.com)
KYC/KYB procedures (access controlled)

ICR User guide is available from here:
Registry user guide - ICR Program (carbonregistry.com)

c) Further information about different statuses of credits is provided in ICR process requirements and ICR definitions, see:

ICR Process Requirements v5.0 - ICR Program (carbonregistry.com)
ICR Definitions v2.0 - ICR Program (carbonregistry.com)

In the ICR process requirements information is provided on serialization of credits in section 4.1. accessible through the following publicly available link. ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.1

See also ICR registry user guide:
Registry user guide - ICR Program (carbonregistry.com)

d) Serial numbers play an important role in ensuring the integrity and traceability of carbon credits. Even though the tokenization of credits on chain ensures the uniqueness of a project and a credit, a credit serial number further serves as a consistent unique identifier assigned to each vintage of each project, representing a reduction, avoidance, or removal of CO2-e.

The serial number ensures that each credit is distinct and traceable. Relying on serial numbers helps prevent double counting and fraud. It ensures that a specific carbon credit can be tracked throughout its lifecycle, from issuance to retirement, which is essential for maintaining credibility.

The serialization of ICCs helps to see the credits' attributes and compare projects easily. The serialization structure is provided below.

Component	Order	Type	Length	Range	Comment
Credit identifier	1	Letter	3	Text	Fixed value. Unique registry identifier. (ICC, FCC)
Project Country	2	Letter	3	ISO 3166-1	Three-letter country code for the project (e.g., Iceland is ISL).
Project country dialing code	3	Numeric	3	1-999	Three-digit country code for the project (e.g., Iceland is 354).

Project ID	4	Numeric	4	1-9999	Registry assigned identifier for the project, unique in the registry.
Sector	5	Numeric	2	1-16	Sectors from CDM
Type	6	Letter	1	A, R, H	Avoidance, Removal, Hybrid
Host country attestation	7	Numeric	1	1;0	1 = Yes, 0 = No attestation
Vintage (Year)	8	Numeric	4	0-9999	The vintage year of the credits.
Multiple project activities	9	Numeric	3	0-999	ID of a sub-project. If not multiple project activities, this identifier is not used.

Example: ICC-ISL-354-33-13-A-0-2022
GHG program: International Carbon Registry
Project Country: Iceland
Dialing code: 354
Project ID: 33
Sector: Waste handling and disposal
Type: Avoidance
Host country attestation: No approval for ITMO transfer.
Vintage: 2022
Multiple project activities: Not a Multiple project activity.

e) N/A (See also d))
f) N/A

The full contents of these procedures can be found using the following publicly available link
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com)

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)*)
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:
Click or tap here to enter text.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

The registry system is equipped to handle transfers of units from other greenhouse gas (GHG) programs. It's important to note that this system also supports the Icelandic Forest Carbon Code (FCC), meaning that currently, accounts can be used to manage both International Carbon Credits (ICC) and FCC credits. Other GHG programs are not currently supported. ICR is currently working on integration with the Climate Action Data Trust. Integration with the CAD trust will bring a new layer of transparency and traceability of registries connected.

This can be demonstrated upon request.

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

HTTPS stands for Hypertext Transfer Protocol Secure. It is the protocol where encrypted HTTP data is transferred over a secure connection. By using secure connections such as Transport Layer Security or Secure Sockets Layer, the privacy and integrity of data are maintained, and authentication of websites is also validated. This protocol secures the registry. There is security in place to stop restoring the database for ICR. General Data Protection Regulation 2016/679, one of the regulations is to "encrypt, pseudonymize, or anonymize personal data wherever possible". Transparent Data Encryption is enabled on the ICR database. Doing this requires no changes to the application and provides a blanket of protection by encrypting all data held at rest within the database with AES-256 encryption. This is also compliant with the ISO/IEC 18033-3:2010 standard for block ciphers for the purpose of confidential data protection. Implementing TDE also protects the database against attackers or malicious users stealing backup files of the database and restoring them off-site, as these backup files are also encrypted. Transfers of credits within the registry or listing on a exchange are only permitted by the owner of the credits and have 'SitePermission.Credit_Transfer' permissions. This permission check is on the frontend, for example, the (.cshtml page) and the backend, the server side (.cs file) side.

2023 – application

Data transfers are taken seriously in the application of the registry. When it comes to exchanging data with other systems, industry-standard protocols are applied to ensure that the data is transferred securely, efficiently, and accurately.

For communication over the internet, HTTPS/TLS is used. This protocol encrypts the data being transferred between the client and server, ensuring that it cannot be intercepted or modified by third parties. With HTTPS/TLS, users can be sure that their data is always safe and protected.

When communicating with Blockchain (EVM) and Stellar, JSON-RPC is used. This protocol is lightweight, easy to use, and well-suited for exchanging data between systems securely. With JSON-RPC, data exchange is efficient between systems, ensuring accuracy and accountability.

Registry system management requires two-factor authentication for administrator to make changes to the system and role-based authorization to control access to internal systems.

Overall, the registry applies best data transfer protocols to ensure user's data is always protected and accurate. Whether users are using ICR application to communicate with other systems or just to store and manage their own data, they can trust that the registry is using the best possible protocols ensuring security and accuracy of their data.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

The registry provides APIs for various platforms to access information regarding ICR projects and credits. The data API is safeguarded by an authentication/authorization using standard, short-lived, access tokens that are additionally hashed in our database ensuring maximum security even in the event of a data-breach. Each onboarded organization can create an access token through the carbonregistry.com platform. See

ICR also provides an app/integrations API for third party platforms to offer services to ICR projects. ICR prioritizes security in third-party integrations. We do this by leveraging the OAuth2.0 (Open Authorization) protocol, which is the industry-standard protocol for authorization. It also allows us to facilitate secure and seamless integrations with external services, ensuring that only authorized parties have access to sensitive data. This adds an extra layer of protection and control when third-party entities interact with our system. Before third party services, or organizations, can access the app/integrations API, they must first onboard as an organization onto ICR and obtain a Private key which they use to authenticate themselves when using the integrations API. via symmetric key encryption.

ICR is also working with Cad Trust, running a CHIA blockchain light node in the AWS cloud using it to post transactions onto CHIA including ICR credit and project data.

Additional information for previous applications: The registry platform is a cloud based platform hosted on Digital ocean with data stored using Postgres hosted on Supabase. All data transfers are protected using the SSL / TLS standards in their newest, stable, versions. Sensitive data is stored encrypted via symmetric key encryption or hashed when applicable (as with passwords / access tokens). All credit transactions, transfers, retirements, cancellations, issuances are recorded on public blockchains by ICR project contracts, implementing the ERC-1155 standard. See further in appendix D.

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 – application

ICR has implemented a Conflict of Interest policy available on the ICR website https://carbonregistry.com/templates/ (link does no longer works)

All personnel and affiliates have a continuing responsibility for identifying, declaring, and managing any potential or perceived conflict of interest that applies to them. Where personnel suspects that they may have a potential/perceived/actual conflict of interest, they shall discuss any conflict of interest with general management and provide a declaration of conflict of interest. Personnel should provide all information on the reporting form

relevant to the identified conflict of interest in order to allow general management to fully assess whether a conflict of interest in fact exists.

If ICR determines there is a potential/perceived/actual conflict of interest, ICR will prepare and propose a conflict of interest management plan. Personnel is responsible for discussing any proposed conflict of interest management plan with general management

ICR will consider any input the personnel may have in relation to the proposed management plan. However, the personnel must follow any conflict of interest management plan decided upon by the ICR.

There may be circumstances in which a potential/actual/perceived conflict of interest involves general management. The ICR Board will work with the entity to develop the conflict of interest management plan in such a situation.

This is further outlined in the ICR Conflict of Interest policy available on ICR website: https://carbonregistry.com/templates/

2023 – application

N/A

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's iapproval of programme eligibility (*if none, "N/A"*):
Since last application ICR has established new policies that can be accessed using the following links:

- Quality policy
- KYC/KYB Compliance policy
- Grievance policy
- Anti-corruption compliance policyv
- Impartiality policy (previously CoI policy)

In addition to these policies ICR has developed a quality management system to manage the operation of the ICR program systematically. To support the policies, ICR has processes and procedures to complement the policies, e.g., the Grievance process, KYC/KYB process and procedure, and management of impartiality. Some procedures are publicly from the ICR documentation page, and some are available from the ICR QMS site (access controlled).

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. Information contained in the programme's original application, including information submitted in response to

follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR will only open an account for an account holder if:

a) the account holder has indicated acceptance of Terms and Conditions; and
b) the account holder has provided sufficient identification information, including satisfying Know-Your-Client (KYC) or other background check requirements in accordance with the procedures set out by ICR, including any User Guidelines.

ICR conducts a KYC for all applicants for registry accounts and further must accept the Terms and Conditions. The Terms and Conditions are available on the ICR website https://carbonregistry.com/templates/ along with a standard KYC form.

Lisence, maintenance and service agreement with GEM ensures the registry platform is always secure and always has the most up-to-date security patches and features in place. An annual audit is scheduled on the first anniversary of the live launch of the ICR registry platform.

2023 - application

To increase the reach of ICR registry platform individuals can create a user account with ICR also to reduce 3rd party retirements, organizations may easily create accounts holding retired credits, active credits or inactive credits. This eases audits of claims made by organizations and transparency of the market.

With user accounts users may browse ICR registry platform engage with proponents and projects. They may become verified users by completing a KYC. As verified user they may create organizations, participate in stakeholder consultation and more actions not available for unverified users. Organizations that intend to establish an account for the purpose of registering a project, market participants, and validation and verification bodies are subject to KYB. When they have completed the KYB to ICRs satisfactory they will become verified organizations and are allowed to perform actions that unverified organizations are not able to perform, e.g. have a public profile, register projects, issue instruments, transfer instruments, etc. The KYC and KYB processes ensure compliance from the start with built-in ID verification as well as PEP and sanctions list checks.

All users need to accept terms and conditions subject to their intentions with the platform.

To ensure the security and compliance of registry application, certified third-party vendors are contracted to perform periodic security audits and evaluations. This helps to identify and address any security vulnerabilities or non-compliance issues, and ensures that registry application meets the highest standards for security and data protection.

The ICR terms and conditions are available on the ICR website https://carbonregistry.com/explore-our-program/.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Now all documentation relating to the ICR program is available on ICR documentation page.

https://documentation.carbonregistry.com/documentation/

Now ICR has established a KYB/KYC compliance policy and in ICR process requirements more details on how KYC/KYB is completed.

The Terms and Conditions for both Users and Organizations on the ICR platform provide comprehensive information regarding Know Your Customer (KYC) and Know Your Business (KYB) requirements. Additionally, the ICR process requirements document outlines the procedures for KYC and KYB compliance. While ICR permits both users and organizations to maintain unverified status, this significantly limits their functionality within the platform. Specifically, no projects can be registered until the organization holding the account has completed KYB verification, and the authorized representative has undergone KYC verification. Detailed information on these requirements and procedures can be found at:

Terms and Conditions
ICR Process Requirements
ICR user guide
ICR registry
KYC/KYB Compliance Policy

For KYC/KYB processes and procedures are available in ICR QMS (access controlled). The ICR utilizes a third-party digital service provided by Taktikal for KYC/KYB processes, which is also employed for the facilitation of electronic signatures. This integration ensures a seamless and secure verification process for all users and organizations engaging with the ICR platform.

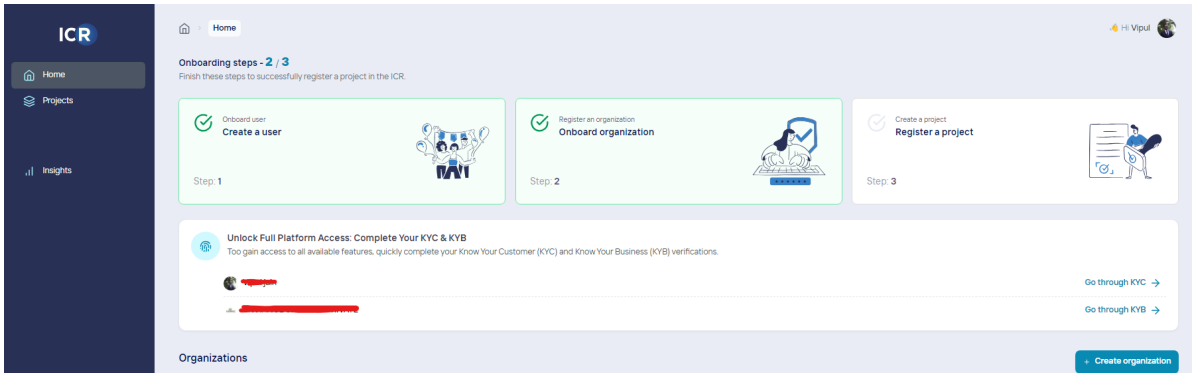


Figure 2: Onboarding new users/organizations and KYC/KYB process flow

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Yes, the ICR defines and ensure the underlying attributes and property aspects of a unit

In ICRs Terms and Conditions, the attributes of units are defined as: Instrument means a unit issued by and held in the ICR Registry representing the right of an Account Holder in whose account the unit is recorded to claim the achievement represented by the unit. Such achievement may include, but is not limited to, i) a GHG Emission Mitigation in an amount of one (1) metric tonne of CO2 equivalent that has been validated and verified in accordance with the applicable ICR Requirements and any operational documents, ii) guarantee of the nature and origin of energy is produced from a renewable natural resource in an amount of one (1) Mega Watt Hour (MWh).

Recordation of an instrument in the holder's account at the ICR Registry is evidence of that account holder's entitlement to that instrument. A **carbon credit** means a transferrable unit issued electronically representing a GHG emission mitigation in an amount of one (1) metric tonne of CO2 equivalent, which can be used for offsetting emissions. Further, an **in-active** ICC is defined as ICCs that have been issued in the ICR registry from a registered project that an approved VVB has validated. Active ICCs are issued subject to **Activation** and means activation of issued ICCs based on verification of real GHG emission mitigations. **Active** ICCs can be retired and used for the purpose of offsetting Emissions.

Attributes of credits may be found in the definitions section in ICR Requirement Document, ICR Process Requirements and Terms and Conditions, all available on ICRs website: https://carbonregistry.com/explore-our-program/

2023 - application

Yes, the ICR defines and ensures the underlying attributes and property aspects of a unit

In ICRs definitions, the attributes of units are defined as:

Instrument means a unit issued by and held in the ICR registry representing the right of an account holder in whose account the unit is recorded to claim the achievement represented by the unit. Such achievement may include, but is not limited to, i) a GHG emission mitigation in an amount of one (1) metric tonne of CO2 equivalent that has been validated and verified in accordance with the applicable ICR requirements and any operational documents, ii) guarantee of the nature and origin of energy is produced from a renewable natural resource in an amount of one (1) megawatt hour (MWh). Recordation of an Instrument in the holder's account at the ICR registry is evidence of that account holder's entitlement to that instrument.

A record of an instrument in account in the ICR registry platform is evidence of that account holder's entitlement to that instrument. **Carbon credit** means a transferrable instrument issued electronically representing GHG emission mitigation in an amount of one (1) metric tonne of CO2 equivalent, which can be used for offsetting emissions. **ICC** means International Carbon Credit. Further, an **in-active** ICCs mean ICCs that have been issued in the ICR registry from a registered project that an approved VVB has validated. Active ICCs are issued subject to **Activation** and means activation of issued ICCs based on verification of real GHG emission mitigations. **Active** ICCs can be retired and used for the purpose of offsetting Emissions.

Attributes of instruments may be found in the ICR definitions and in ICR requirement document, ICR process requirements and ICR terms and conditions, all available on ICRs website: https://carbonregistry.com/explore-our-program/

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Now all documentation relating to the ICR program is available on ICR documentation page.
https://documentation.carbonregistry.com/documentation/

In addition to information provided in the last submission, ICR requirement document ICR now has a requirement stipulating that:

The project proponent shall not account for any GHG emission mitigations resulting for the project activities for any ICCs retired by another organization for their own GHG reporting. The project proponent shall report the baseline emissions, but may report separately on any instruments issued from the project activities. If the project proponent wants to report publicly actual GHG emissions he shall retire ICCs if they want report and account for the benefit associated with the project implementation.

Relevant referred revised documents from last submission

- ICR requirement document
- ICR process requirements
- ICR definitions
- ICR terms and conditions

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

As a part of ICRs objectives, ensuring consistency and quality of validation and verification prepared by validation/verification bodies is essential for projects' integrity toward sustainability principles.

a) and b)

An accredited third party performs all validation and verification procedures, where validation and verification reports are submitted to the ICR.

ICR provides requirements for validation and verification, which are described in ICR Requirement Document. Validation and verification shall be conducted according to ISO 14064-3 and ISO 14065. Further, the criteria for validation and verification are ISO 14064-2, ICR Requirement Document and the applied methodology, and the process of validation and verification shall follow the requirements set out in ISO 14064-3. In the case of deviation from applied methodology prior to or after project implementation, the VVB shall determine if the deviation is material for the verification or validation of the project.

Please see the ICR Requirement Document section 6, *Validation*, for a complete description of the validation process, required competence, and requirements regarding the validation report. Further on, see section 4.4.2, *Validation of Projects*, in ICRs Process Requirements for a description of the validation process and what documentation is required.

Please see the ICR Requirement Document section 8, *Verification*, for a full description of the verification process, required competence, and requirements regarding the verification report. Further on, see section 4.5, *Verification and Activation of ICCs*, in ICRs Process Requirements for a detail of the verification process needed to be granted permission to activate ICCs.

c) and d)

For VVBs to be eligible for conduction validation and verification, they must sign an agreement to provide validation and verification services with the ICR. VVBs shall hold accreditation under either an ICR approved GHG program or accreditation under ISO 14065 by an accreditation body that is a member of the International Accreditation Forum. Moreover, the VVB shall hold accreditation or approval for all appropriate sectoral scopes relevant to applied methodology. Verification and validation teams shall meet the competence requirements set out in ISO 14065 and 14066.

All reports regarding validation of activities and verification of emissions reductions are publicly available in the registry under each individual project.

Please see the full list of projects here:
https://iceland.itmoregistry.net/Public/Project

To see validation reports and verification reports, click view on the respective project, and you will enter the project's site in the registry platform. Documentation is available at the bottom of the page.

Accreditation of validators and verification bodies, including the sectoral scopes that the VVB is accredited for, is published on ICRs website.

Please see validators approved by ICR and their accreditation here:
https://carbonregistry.com/validation-and-verification/

To see VVB's accreditation and coverage of sectoral scope for validation and/or accreditation, click on the VVB, and you will enter their respective page on the ICR webpage.

Please see The ICR Requirement Document section 9, *Validation and Verification bodies*, for a description of requirements for VVBs seeking to perform any validation or verification for a project registering with ICR. Further, a full description of the process of becoming an approved VVBs with ICR is available in section 10 in the ICR Process Requirements.

2023 - application

As a part of ICRs objectives, ensuring consistency and quality of validation and verification prepared by validation/verification bodies is essential for projects' integrity toward sustainability principles.

a) and b)

An accredited third party performs all validation and verification procedures of projects and impacts, where validation and verification reports are submitted to the ICR.

ICR provides the criteria for validation and verification, which are described in ICR requirement document. Validation and verification shall be conducted according to ISO 14064-3 and ISO 14065. Further, the criteria for validation and verification are ISO 14064-2, ICR requirement document and where applicable the applied methodology. The process of validation and verification shall follow the requirements set out in ISO 14064-3. In the case of deviation from applied methodology or project design description prior to or after project implementation, the VVB shall determine if the deviation is material and affects if the project meets the criteria for the verification or validation of the project.

Please see the ICR requirement document section 6, *Validation*, for a complete description of the validation process, required competence, and requirements regarding the validation report. Further on, see section 2.4.2, *Validation of Projects*, in ICRs process requirements for a description of the validation process and what documentation is required.

Please see the ICR requirement document section 7, *Verification*, for a full description of the verification process, required competence, and requirements regarding the verification report. Further on, see section 2.5, *Verification and Activation of ICCs*, in ICRs process requirements for the details of the verification process needed to be granted permission to activate ICCs (or issue ICCs ex-post).

c) and d)

For VVBs to be eligible for conduction validation and verification, they must sign an agreement with the ICR to provide validation and verification services. VVBs shall hold accreditation under either an ICR approved GHG program or accreditation under ISO 14065 by an accreditation body that is a member of the International Accreditation Forum (IAF). Moreover, the VVB shall hold accreditation or approval for all appropriate sectoral scopes relevant to the project activities. Verification and validation teams shall meet the competence requirements set out in ISO 14065 and 14066.

All reports regarding validation of activities and verification of emissions mitigations are publicly available in the ICR registry platform under each individual project. See www.app.carbonregistry.com

Accreditation of validation and verification bodies, including the sectoral scopes that the VVB is accredited for, is published on ICRs website. Please see VVBs approved by ICR and their accreditation here: https://carbonregistry.com/explore-our-program/#vvbs

To see VVB's accreditation and coverage of sectoral scope for validation and/or accreditation, click on the VVB, and you will enter their respective page on the ICR webpage.

Please see The ICR requirement document section 8, *Validation and Verification bodies*, for a description of requirements for VVBs seeking to perform any validation or verification for a project registering with ICR. Further, a full description of the process of becoming an approved VVBs with ICR is available in section 8 in the ICR process requirements.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Now all documentation relating to the ICR program have been moved to a new domain available on ICR documentation page.
https://documentation.carbonregistry.com/documentation/

Now sections 6. in ICR requirement document addresses validation and verification. Section 6.1 on validation and 6.2 on verification.
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 6.1
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 6.2

Now section 3.4 addresses validation and section 3.7 verification in ICR process requirements, see:
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 3.4
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 3.7

Information about validation and verification bodies can be found in ICR requirement document in section 7 and in section 8 in ICR process requirements information is provided on eligiblitity and criteria, see:

ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 7
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 8

In ICR registry a list of approved VVBs is available using the following public link:

Carbon Projects (carbonregistry.com)

In late 2023 ICR issued a new document focusing on validation and verification in a document named "ICR validation and verification specifications." In that document ICR provides specifications on validation and verification on ICR specific requirements, to address issues where ISO 14064-3 lacks guidance.

Further guidelines and specification relating to methodology validation, see:
ICR validation and verification specifications v1.0 - ICR Program (carbonregistry.com)

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR publicly discloses who is responsible for the administration of the program and how decisions are made.

The ICR, having the legal name Loftslagsskrá Íslands ehf., is controlled by the members of the ICR Board and administered by the ICR General management. Members of the board and ICRs CEO (who is a part of general management) are introduced on the ICRs webpage under About us. As described on the webpage, ICR provides an electronic registry platform for climate projects and administers the ICR program, whereas the platform is designed and developed by Global Environmental Markets (GEM).

The ICR Board controls the ICR under the guidance and recommendations from the PAMAP and ICR general management. In this context, the ICR Board sets out the strategic direction of the ICR and actively seeks expansion opportunities, follows carbon markets developments, and makes decisions on further documentation for the ICR program, as appropriate and on any revisions, amendments, or additions to requirements and procedures. The ICR Board ultimately approves new methodologies and revisions, sets out requirements for approval of VVBs, following accreditation standards. It identifies barriers to the implementation of activities and mitigations of barriers. ICR Board monitors and reviews the operation of ICR general management with input from a third-party audit and safeguards that requirements, processes, methodologies, and standards are publicly available and address issues relating to ICR operational documents and facilitate the development and maintenance of the ICR registry. Procedures of the ICR Board is available in ICR website: https://carbonregistry.com/templates/

ICR has established a PAMAP to support and guide the ICR Board in any substantial decisions that are to be made. The PAMAP is a group of carefully selected and highly competent technical experts in climate solutions and carbon markets who will consult ICR for its operations to ensure maintenance and operation of a transparent and trustworthy GHG Program that is effective and efficient for all users and stakeholders.

Among others, PAMAPs role is to

> [*Provide advice on enhancements and strategic direction of the ICR Program and its procedures; provide recommendations to ICR regarding need and priority areas for revisions and amendments to requirements, operational guidelines, procedures, for the operation of the ICR Program; Provide insight into the needs of stakeholders*….]
>
> [*review processes related to registration of climate projects and issuance of carbon credits; review and provide advice to draft documentation regarding the establishment, revision, or withdrawal of requirements, operational guidelines, and clarifications for climate projects to register and issue carbon credits; review and provide advice to draft documentation for revisions for methodological requirements for climate project activities*]

Please see ICRs Program Advisory and Methodology Approval Panel Procedure on the procedures of the PAMAP and its advisory role in decision making with the ICR. Available on ICR website.
https://carbonregistry.com/templates/

The ICR General management is responsible for the day-to-day operation of the ICR program, communication with the PAMAP, the ICR Board, technical support, project registration, preparing revisions and amendments to the ICR procedures and operational documentation, engagement with stakeholders, and all administrative operations required for the continuous operation of the ICR program.

2023 - application

ICR publicly discloses who is responsible for the administration of the program and how decisions are made.

The ICR, having the legal name Loftslagsskrá Íslands ehf., is controlled by the members of the ICR Board and administered by the ICR General management. Members of the board and ICRs CEO (who is a part of general management) are introduced on the ICRs webpage under *About us*. As described on the webpage, ICR provides an electronic registry platform for climate projects and administers the ICR program, whereas the platform is designed and developed by Mojoflower.

The ICR Board controls the ICR under the guidance and ICR general management. In this context, the ICR Board sets out the strategic direction of the ICR and actively seeks expansion opportunities, follows carbon markets developments, and makes decisions on further documentation for the ICR program, as appropriate and on any revisions, amendments, or additions to requirements and procedures. The ICR Board ultimately approves new methodologies and revisions, sets out requirements for approval of VVBs, following accreditation standards. It identifies barriers to the implementation of activities and mitigations of barriers. ICR Board monitors and reviews the operation of ICR general management with input from a third-party audit and safeguards that requirements, processes, methodologies, and standards are publicly available and address issues relating to ICR operational documents and facilitate the development and maintenance of the ICR registry. Procedures of the ICR Board and its support from advisory is available in ICR website: https://carbonregistry.com/explore-our-program

The ICR General management is responsible for the day-to-day operation of the ICR program, communication with the ICR Board, technical support and development, project registration, preparing revisions and amendments to the ICR procedures and operational documentation, engagement with stakeholders, and all administrative operations required for the continuous operation of the ICR program.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Now all documentation relating to the ICR program is available on ICR documentation page.

https://documentation.carbonregistry.com/documentation/

Since last submission Loftslagsskrá Íslands ehf. (International Carbon Registry) and Mojoflower ehf. (registry tech developer) have merged and are now sister companies under sole ownership of Gaia group ehf.

This close collaboration between the two companies enhances their operational synergy and effectiveness in the GHG program operation and carbon registry domain. More details about the organizational structure are available on the ICR program documentation page.

Information about all companies is readily available on Icelandic Tax Authorities pages/company register. Annual statements, information about beneficial owners and more information are publicly available using the following links.

Loftslagsskrá Íslands ehf. (International Carbon Registry ehf.):
https://www.skatturinn.is/fyrirtaekjaskra/leit/kennitala/5007200340
Mojoflower ehf.: https://www.skatturinn.is/fyrirtaekjaskra/leit/kennitala/5705210710
Gaia group ehf.: https://www.skatturinn.is/fyrirtaekjaskra/leit/kennitala/4103240160

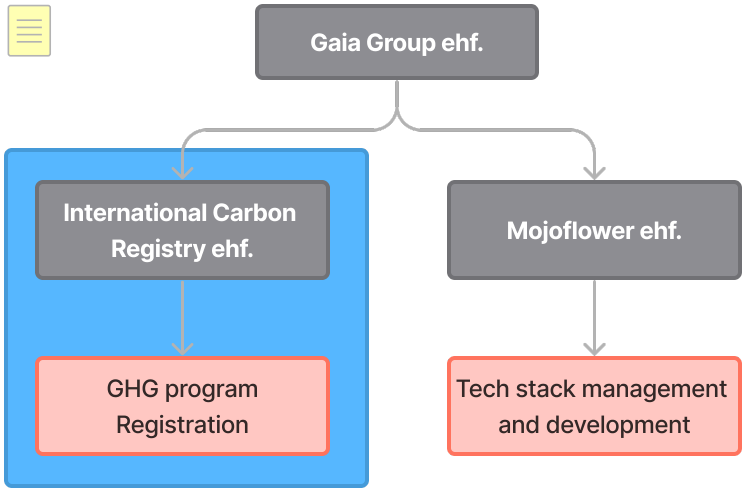


Figure 3: Organizational relationship.

The organizational chart for ICR is accessible on the documentation and QMS page of ICR's website, providing clear visibility into the structure of the organization. The organizational structure has been changed where the functional units of ICR are:

- Product strategy and innovation
- Business development
- Financials
- Registry backend
- Registry operation
- ICR program management
- Registration

Procedures established by the ICR board delineate the responsibilities of the board members in relation to the oversight and management of the ICR program, ensuring accountability and effective governance.

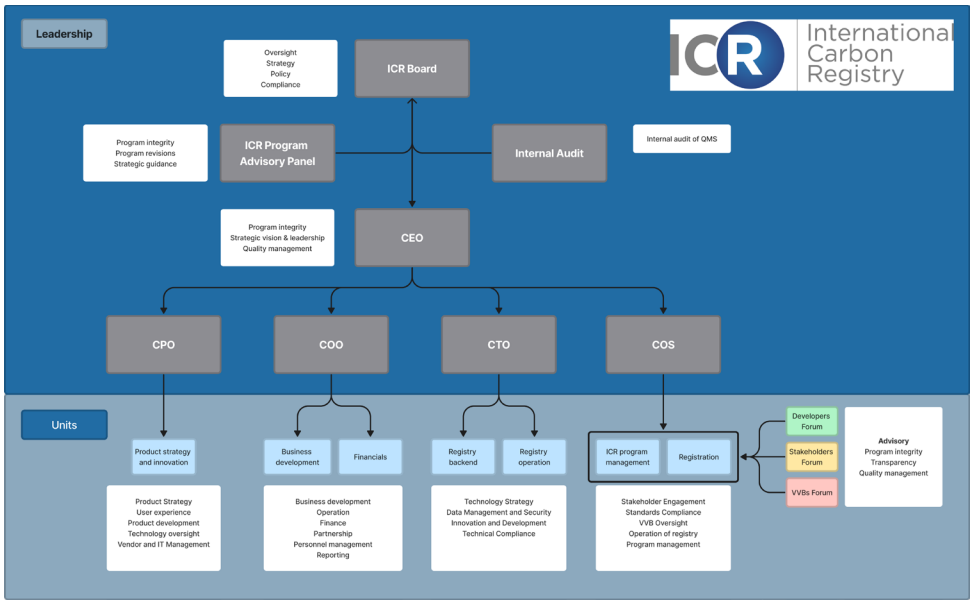


Figure 4: Organizational chart

- *The ICR board shall meet as necessary but no less than biannually for discussion of the operations of the ICR program management. All documentation for the ICR board meetings shall be made available to members in due time.*
- *The ICR board controls the ICR under the guidance and recommendations of the PAP and ICR CEO. In this context, the ICR board shall:*
- *Set out the strategic direction of the ICR and actively seek expansion opportunities.*
- *Follow carbon market developments.*
- *Make decisions on further documentation for the ICR program, as appropriate.*
- *Make decisions on any revisions, amendments, or additions to requirements and procedures.*
- *Approve new methodologies and/or revisions.*
- *Set out requirements for approval of VVBs, following accreditation standards, further:*
    - *Decisions on suspension, and withdrawal of approval.*
    - *Operationalization of procedures and standards for approval.*
- *Identify barriers to implementing activities and mitigations of barriers to support funding of project activities, as necessary.*
- *Review the operation of the ICR program with input from internal audit.*
- *Approve and make requirements, processes, methodologies, and standards publicly available.*
- *Develop and maintain the ICR registry for project activities containing information on registered project documentation and information on all ICCs issued.*
- *Address issues relating to ICR documentation.*
- *Carry out any other issues regarding the operation of the ICR program.*

In addition to the duties outlined in the ICR board procedures, the ICR board also oversees the management of a Quality Management System (QMS), where it is tasked with the annual responsibility of conducting a management review. This entails a systematic evaluation of ICR's performance, effectiveness, and alignment with strategic objectives. The review process incorporates an assessment of quality objectives, audit outcomes, and pertinent data

to ensure continuous improvement.

Detailed information regarding the leadership structure of ICR is available under ICR documentation, including the roles, responsibilities, and authorities of the ICR board, ensuring transparency and accountability within the organization's governance framework.

Under leadership on ICRs program documentation page information about the governance is publicly available also ICR board procedures and the ICR program advisory panel.

- Leadership
- Articles of Association
- Organizational Roles, Responsibilities, and Authorities
- ICR Board Procedures
- ICR Program Advisory Panel

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 – application

a) and b) The ICR has been in implementation since 2020, whereas it was at first supposed to serve only in Iceland for providing registration for afforestation based on the Forest Carbon Code issued by the Icelandic Forestry Services. However, with international development and stakeholder engagement, the program was expanded and developed for international registration of climate projects with the mission to support the scaling of climate actions and decarbonizations of the economy. Loftslagsskrá Íslands ehf. Reg.no. 5007203040, known as the ICR, was established formally in June 2020. The ICR has been operational since officially launched in August 2021.

c) ICR has not established a long-term plan of multi-decadal program elements as carbon markets are still evolving and developing with the rule book on article 6 of the Paris Agreement just recently agreed upon during COP 26 in Glasgow. ICR has and will follow all development in the carbon markets and follow statutory requirements and intergovernmental guidelines with how voluntary carbon markets will serve and support and/or go beyond national targets or pledges.

d) All submitted documents and records are kept for a minimum of 7 years after the last retirement of credits Issued and Activated resulting from the project activities as outlined in the ICR Process Requirements. Further, ICR intends to keep records of issuances and retirements and will continue to disclose publicly without time limitations. In case of dissolution, it is expected that accounts will be closed, but all relevant information and data will be saved and continue to be publicly disclosed

2023 - application

a) and b) The ICR has been in implementation since 2020, whereas it was at first supposed to serve only in Iceland for providing registration for afforestation based on the Forest Carbon Code issued by the Icelandic Forestry Services. However, with international development and stakeholder engagement, the program was expanded and developed for international registration of climate projects with the mission to support the scaling of climate actions and decarbonizations of the economy. Loftslagsskrá Íslands ehf. Reg.no. 5007203040, known as the ICR, was established formally in June 2020 preparing the launch of the ICR GHG program and provide registration service for other environmental certificates, e.g. Guarantees of origin. In August 2023 the ICR will have its two years anniversary of operation and governance.

c) and d)
The ICR has an active, engaged, and knowledgeable Board who would see to an orderly transition of long-term program elements in the case of a dissolution of the ICR. Including ongoing oversight of projects and support to transition to other registries. As the ICR registry is relying on public blockchains all issued instruments, their transactions, retirements/cancellations remain on an immutable public ledger and will remain irrespective of the event of dissolution of ICR. No such plans have however been established and documented as such, but ICR will consider developing such documents and disclose its long term plans and dissolution action plan.
The ICR was founded based on need and intends to become a leader in supporting scaling up of voluntary initiatives tackling the climate crisis by relying on and promoting standardization of climate actions. ICR has and will follow and engage with all development in VCMs and follow statutory requirements and intergovernmental guidelines as to how VCMs will serve, support, and go beyond national targets or pledges.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Now all documentation relating to the ICR program is available on ICR documentation page.
https://documentation.carbonregistry.com/documentation/

In addition to information since last submission:

a. and b. ICR has been operational from 2021. In August 2024 ICR will have been operational for 3 years.

c. and d. The ICR is establishing a warranty program that addresses for example any risk of dissolution of the program in its current form. In addition, ICR is working alongside on a plan for long-term administration of the program. ICR anticipates that the warranty program will be released in Q2 2024.

Are policies and robust procedures in place to…	
a) prevent the programme staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of programme services? (*Paragraph 2.7.3*)	☒ YES
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):
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR has implemented a Conflict of Interest policy available on the ICR website https://carbonregistry.com/templates/.

a) All personnel and affiliates have a continuing responsibility for identifying, declaring, and managing any potential or perceived conflict of interest that applies to them. Where personnel suspects that they may have a potential/perceived/actual conflict of interest, they shall discuss any conflict of interest with general management and provide a declaration of conflict of interest. Personnel should provide all information on the reporting form relevant to the identified conflict of interest in order to allow general management to fully assess whether a conflict of interest in fact exists.

b) If ICR determines there is a potential/perceived/actual conflict of interest, ICR will prepare and propose a conflict of interest management plan. Personnel is responsible for discussing any proposed conflict of interest management plan with general management. ICR will consider any input the personnel may have in relation to the proposed management plan. However, the personnel must follow any conflict of interest management plan decided upon by the ICR.

   There may be circumstances in which a potential/actual/perceived conflict of interest involves general management. In such a situation, the ICR Board will work with the entity to develop the conflict of interest management plan.

This is further outlined in the ICR Conflict of Interest policy available on ICR website.
https://carbonregistry.com/templates/

2023 - application

ICR has implemented a conflict of interest policy available on the ICR website https://carbonregistry.com/explore-our-program/

a) All personnel and affiliates have a continuing responsibility for identifying, declaring, and managing any potential or perceived conflict of interest that applies to them. Where personnel suspects that they may have a potential/perceived/actual conflict of interest, they shall discuss any conflict of interest with general management and provide a declaration of conflict of interest. Personnel should 20provide all information

on the reporting form relevant to the identified conflict of interest in order to allow general management to fully assess whether a conflict of interest in fact exists.

b) If ICR determines there is a potential/perceived/actual conflict of interest, ICR will prepare and propose a conflict of interest management plan. Personnel is responsible for discussing any proposed conflict of interest management plan with general management. ICR will consider any input the personnel may have in relation to the proposed management plan. However, the personnel must follow any conflict of interest management plan decided upon by the ICR.

   There may be circumstances in which a potential/actual/perceived conflict of interest involves general management. In such a situation, the ICR Board will work with the entity to develop the conflict of interest management plan.

This is further outlined in the ICR Conflict of interest policy available on ICR website.
https://carbonregistry.com/explore-our-program

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.

https://documentation.carbonregistry.com/documentation/

Since the last application ICR has established new policies which can be accessed via the following publicly available links.

- Quality policy
- KYC/KYB Compliance policy
- Grievance policy
- Anti-corruption compliance policy
- Impartiality policy (previously CoI policy)

In addition to these policies, ICR has developed a quality management system to manage the operation of the ICR program systematically.

To support the policies, ICR has processes and procedures to complement the policies, e.g., the Grievance process, KYC/KYB process and procedure, and management of impartiality to systematically prevent any CoI or corruption. Some procedures are publicly from the ICR documentation page, and some are available from the ICR QMS site (access controlled).

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	☒ YES

USD$5M? (*Paragraph 2.7.4*)	

Provide evidence of such coverage:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR has not established professional liability insurance. Decisions about registration and issuances of ICCs are based on validation and verification of mitigation outcomes. Requirements towards VVBs are readily available on ICR website in the ICR Requirement Document where it states that VVBs shall be accredited for ISO14065, which refers to ISO 17029 with regards to liability in section 5.4. The validation/verification body shall be able to demonstrate that it has evaluated the risks arising from its validation/verification activities and that it has adequate arrangements (e.g. insurance or reserves) to cover liabilities arising from its activities in each validation/verification programme and the geographic areas it operates. ICRs has implemented further in its agreements with VVBs indemnification clause indemnifying ICR of all claims and keep indemnified on demand against any loss incurred by ICR which arises as a result of or in connection with the negligence, fraud, or willful misconduct of the VVB. Irrespective of those above, if deemed required by the TAB/ICAO, ICR is willing to establish liability insurance.

2023 - application

N/A

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

The ICR is currently in the process of applying for an insurance industry agents association program that will issue the required $5M professional liability insurance policy sometimes called E&O (errors & omissions). Likely the policy will be higher than $5m. The ICR is further developing a warranty policy on the services it provides to enforce and encourage accountability. Information about warranty policy can be provided upon request. ICR anticipates that the warranty program will be released in Q2 2024.

Question 3.8 <u>Transparency and public participation provisions</u>

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. Information contained in the programme's original application, including information submitted in response to

follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR publicly discloses what information is captured and made available to different stakeholders.

ICR believes that transparency throughout the sector is crucial for a reliable and trustworthy VCM.
Descriptions of what information shall be publicly disclosed and what information will not be publicly disclosed can be found in section 4.4.5, *Issuance of ICCs*, in ICRs Process Requirements.

> [*…the following documents shall be uploaded to the ICR registry as public documents:*
> *a. Project design description,*
> *b. Validation report,*
> *c. Monitoring report,*
> *d. Verification report,*
> *e. Documentation relating to other certifications,*
> *f. any methodology specific documentation*.]
>
> [*and the following documents as private documents*
> *g. Validation plan*
> *h. Verification plan.*
> *i. Validation agreement*
> *j. Verification agreement*
> *k. Documentation regarding cancellation of GHG credits under another GHG program if applicable*
> *i. Any agreements with third parties due to implementation and operation of the project*.]

For projects, documentation that is made publicly available includes Project Design Description, Validation report, Monitoring report, Verification report (when ICCs have been Activated), documentation relating to other certifications, and any methodology specific documentation. If there are any deviations from the PDD when the project is implemented, revised documentation shall be provided for public disclosure. In the case of a proponent withdrawing its project, details of the withdrawn project remain publicly available.

On the ICR website, additional documentation is published for transparency in ICRs operations, including all requirements, external and internal processes, templates, and governance.

b) and c) ICR publicly discloses its local stakeholder consultation requirements, public comments provisions and requirements, and how they are considered.

For new methodology proposals, public stakeholder consultation is required. As outlined in the ICR Methodology Approval Process, the ICR publishes the proposed new methodology documentation on the ICR website for a period of 28 days for the purpose of consultation with stakeholders and the public on the proposed new methodology. In collaboration with ICR, the Methodology developer may host a presentation of the proposed new methodology. Comments shall be submitted to admin@carbonregistry.com, and respondents shall provide their name, organization, country, and email address. When the public consultation has ended, ICR provides comments received to the Methodology developer. The Methodology developer shall respond to all comments either by updating the methodology or demonstrating the insignificance or irrelevance of the comment. All adjustments shall be resubmitted to the VVB for assessment of revision of validation. See further in the ICR Methodology Approval Process available on the ICR website. https://carbonregistry.com/templates/.

Further, in section 5.13 in ICRs Requirement Document, safeguards are set regarding stakeholder engagement as project proponents shall identify the project's negative environmental and socio-economic impacts and engage with local stakeholders during the project design and implementation of the activities. The form of the engagement is not specified specifically. All projects shall undergo a 30-day public comment period as described in ICRs Requirement Document. The project proponent shall respond to all comments received and provide the VVB with a demonstration of how the comments were addressed.

2023 – application

a) ICR publicly discloses what information is captured and made available to different stakeholders.

ICR believes that transparency throughout the sector is crucial for a reliable and trustworthy VCM.
Descriptions of what information shall be publicly disclosed and what information will not be publicly disclosed can be found in section 2.4.5, Issuance of ICCs, in ICRs Process Requirements.

> [*…the following documents shall be uploaded to the ICR registry as public documents:*
> *a. Project design description,*
> *b. Validation report,*
> *c. Monitoring report,*
> *d. Verification report,*
> *e. Documentation relating to other certifications,*
> *f. any methodology specific documentation*.]
>
> [*and the following documents as private documents*
> *g. Validation plan*
> *h. Verification plan.*
> *i. Validation agreement*
> *j. Verification agreement*
> *k. Documentation regarding cancellation of GHG credits under another GHG program if applicable*
> *i. Any agreements with third parties due to implementation and operation of the project.]*

For projects, documentation that is made publicly available includes project design description, validation report, monitoring report, verification report (when ICCs have been activated), documentation relating to other certifications, and any methodology specific documentation. If there are any deviations from the PDD when the project is implemented, revised documentation shall be provided for public disclosure. In the case of a proponent withdrawing its project, details of the withdrawn project remain publicly available.

On the ICR website, additional documentation is published for transparency in ICRs operations, including all requirements, external and internal processes, templates, and governance.

b) and c) ICR publicly discloses its local stakeholder consultation requirements, public comments provisions and requirements, and how they are considered.

For new methodology proposals, public stakeholder consultation is required. As outlined in the ICR methodology approval process, the ICR publishes the proposed new methodology documentation on the ICR website for a period of 28 days for the purpose of consultation with stakeholders and the public on the proposed new methodology.

In collaboration with ICR, the methodology developer may host a presentation of the proposed new methodology. Comments shall be submitted to admin@carbonregistry.com,[11] and respondents shall provide their name,

organization, country, and email address. When the public consultation has ended, ICR provides comments received to the methodology developer.

The methodology developer shall respond to all comments either by updating the methodology or demonstrating the insignificance or irrelevance of the comment. All adjustments shall be resubmitted to the VVB for assessment of revision of validation. See further in the ICR methodology approval process available on the ICR website. https://carbonregistry.com/explore-our-program/

Further, in section 4.2.1 in ICRs requirement document, safeguards are set regarding stakeholder engagement as project proponents shall identify the project's negative environmental and socio-economic impacts and engage with local stakeholders during the project design and implementation of the activities. The form of the engagement is not specified specifically. All projects shall undergo a 30-day public comment period as described in ICRs requirement document. The project proponent shall respond to all comments received and provide the VVB with a demonstration of how the comments were addressed.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.

https://documentation.carbonregistry.com/documentation/

ICR process requirements have been revised since the last submission. Information captured and disclosed publicly, and stakeholder consultation has, however, not changed.

a) Information about information subject to public disclosure is now identified in sections 3.5 and 3.7 in ICR process requirements, see:

ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 3.5
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 3.7

b) ICR PDD template has been improved to allow proponents to share information captured during the consultation and responses effectively. The full contents can be found using the following publicly available links.

ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)
Project design description (PDD) - ICR Program (carbonregistry.com)

c) In addition to information since the last submission when ICR has conducted public consultation on methodologies or program documentation ICR has created a public consultation page where comments can be submitted to ICR via form. The full contents can be found using the following publicly available links. In addition ICR QMS has procedures on how public consultations are considered in both ICR program development and in methodology approval.

Public consultation - ICR Program (carbonregistry.com)
ICR QMS

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):
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) As described above (public comment period for methodology approval process), ICR requires all proposals to undergo a public stakeholder consultation with a 28-day public comment period. All comments are to be addressed by the project proponent, and actions implemented due to comments shall be communicated to the VVB.

   Please see ICRs Requirement Document, section 5.13, for further description of the public comment period for project activities subject to registration. Please see ICRs Methodology Approval Process for further explanation of public comment periods relating to new methodology approvals.

b) As described in the above section, all projects registering with ICR shall undergo a 30-day public comment period described in ICRs Requirement Document. The project proponent shall respond to all comments received and provide the VVB with actions implemented.

c) ICR further sets a requirement for ongoing stakeholder consultation as set out in section 5.13 in ICR Requirement Document. This shall be communicated with ICR and public disclosure through monitoring reporting and verification.

d) ICR has not implemented provisions for public stakeholder consultation for additions and revisions to the ICR Program. However, all revisions are subject to consultation with the PAMAP. The PAMAP shall consider the proposal for conformity to the principles and consistency in the VCM and prepare comments to the ICR Board. See further in the ICR Program Advisory and Methodology Approval Panel.

2023 - application

a) As described above (public comment period for methodology approval process), ICR requires all proposals to undergo a public stakeholder consultation with a 28-day public comment period. All comments shall be addressed by the methodology developer, and actions implemented due to comments shall be communicated to the VVB.

Please see ICRs requirement document, section 4.2.1, for further description of the local stakeholder consultation for project activities subject to registration. Please see section 1.5 in ICRs methodology approval process for further explanation of public comment periods relating to new methodology approvals.

b) As described in the above section, all projects registering with ICR shall undergo a 30-day local stakeholder consultation period described in ICRs requirement document. The project proponent shall respond to all comments received and provide the VVB with actions implemented.

c) ICR further sets a requirement for ongoing stakeholder consultation as set out in section 4.2.1 in ICR requirement document. This shall be communicated with ICR and public disclosure through monitoring reporting and verification.

ICR has not implemented provisions for public stakeholder consultation for additions and revisions to the ICR program.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.

https://documentation.carbonregistry.com/documentation/

In addition to the information provided in last submission the following additional information is provided.

a. Public consultation is prescribed for all new methodologies seeking approval. See section 1 and 1.5 in ICR methodology approval process. ICR has conducted 5 public consultation at the date of submission of this re-application and one methodology is currently under public consultation. See:
ICR Methodology Approval Process v2.0 - ICR Program (carbonregistry.com) section 1 & 1.5
Methodologies - ICR Program (carbonregistry.com)
ICR QMS
ICR QMS

b. Local stakeholder consultation is now stipulated in section 4.2.1 in ICR requirement document. In addition, PDD template has been improved to provide proponents and readers with better understanding of input from local stakeholder consultation. The document is available for downloading at the following link.
Project design description (PDD) - ICR Program (carbonregistry.com)
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.2.1

Note, there is not a public comment period in the registry platform but interested parties may submit comments to ICR on an ongoing basis through the registry platform or via email. All comments are shared with contracted VVB.

c. Ongoing stakeholder consultation is now stipulated in section 4.2.1 in ICR requirement document, see: ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.2.1

d. ICR has recently implemented a management system for the ICR program in alignment with the ISO 9001:2015 and intends to have it certified by a 3rd party certification body in 2024. The processes and procedures related to the ICR QMS, along with governance information, are publicly accessible on the ICR website. However, certain details remain confidential and are not disclosed publicly to safeguard security, privacy, and sensitive business-related information.

The publicly accessible QMS documentation is available through the ICR program documentation website using the provided link below. Additionally, upon request, the TAB may be granted access to the internal QMS of ICR, allowing for a deeper insight into the organization's quality management practices.

ICR's QMS outlines a structured procedure for public consultation and managing change, detailing the development process of the ICR program. This procedure mandates public consultation for program-related documents, including ICR definitions, the ICR requirement document, and ICR validation and verification specifications.

In August 2023, ICR revised the ICR requirements document and ICR definitions. ICR also issued a new document, ICR validation, and verification specifications. All were subject to public consultation.

See further:
ICR QMS (Needs access permission)
Public stakeholder procedure (Needs access permission)
Management of change (Needs access permission)
Previous public stakeholder consultation program (Publicly available)

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR has safeguards in place to address environmental and social risks.

ICR aims to support facilitating financing of climate projects while safeguarding environmental integrity and contributing to a sustainable and low carbon economy; thus safeguarding systems are inherent in the overall procedures.
In ICRs Requirement Document, section 5.13, a description on how ICR ensure safeguarding of environmental and social risks.

> [*Overall, project proponents shall identify and address projects' negative environmental and socio-economic impacts, and collaborate with local stakeholders prior to, during and after implementation of activities to ensure environmental and social integrity throughout the project*.]
>
> [*If mitigation activities involve deviations from the PDD, the proponent shall update it. To ensure that such safeguards are in effect and adopted by project proponents, there is a 30-day public comment period on projects where the VVB will approve the project's conformity to these principles*.]

Please see section 5.13, *Safeguards*, in ICRs Requirement Document for a description of ICRs safeguards.

2023 - application

ICR has safeguards in place to address environmental and social risks.

ICR aims to support facilitating financing of climate projects while safeguarding environmental integrity and contributing to a sustainable and low carbon economy; thus, safeguarding systems are inherent in the overall procedures.

In ICRs requirement document, section 4.2.1, a description on how ICR ensure safeguarding of environmental and social risks.

> [*The project proponent shall recognize, respect, and support local property rights and not infringe on private or public property. The project proponent shall not relocate people off their lands without consent, and when relocation occurs, it shall be carried out with just and fair compensation.*
> *The project shall minimize and, where possible, avoid negative environmental and social impacts. If present, the project proponent shall address all negative environmental and socio-economic impacts arising from the project activities and input received during a consultation with local stakeholders and ongoing communications.*
> *Where applicable, project proponents shall minimize the risk of damage to ecosystems by considering:*
> *(a) not introducing invasive species or allowing an invasive species to thrive through project activities.*
> *(b) the use of non-native species over native species and their potential adverse effects.*
> *(c) the use of fertilizers, chemical pesticides, biological control agents, and other inputs used by the project and their possible adverse effects.*]

Please see section 4.2.1, *Safeguards*, in ICRs requirement document for a description of ICRs safeguards.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.

https://documentation.carbonregistry.com/documentation/

See section 4.2.1
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) Section 4.2.1

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR are using sustainable development criteria.

It is paramount to establish a credible offsetting mechanism to support the goals of the Paris Agreement and those of the United Nations for Sustainable Development. To ensure such credibility, ICR has based its requirements and operation on reference standards that sets out the principles and criteria for sustainable development, such as the World Business Council for Sustainable Development (WBCSD) and the ISO 14060 family of standards. In this way, ICR ensures that registered projects are following globally acknowledged sustainable development criteria, where monitoring, reporting and verification of GHG mitigations are in accordance with high integrity standards.

Please see section 1.3, Reference Standards, for further description of how ICR incorporates sustainability principles and criteria throughout its operations and requirements. Moreover, please read the introduction of ICRs Requirement Document, where values and aims regarding sustainable development are discussed.

b) ICR does have provisions in place for monitoring, reporting, and verification in accordance with the sustainability criteria. All requirements in the ICR Requirement Document are based on the ISO 14060 family of standards amongst other GHG programs established on sustainable development criteria.

[*The ISO 14060 family of standards provides clarity and consistency for quantifying, monitoring, reporting, and validating and verifying GHG mitigations to support sustainable development through a low-carbon economy and benefit organizations, project proponents, and interested parties worldwide.*]

And:

[*All standards contain consistent general requirements for quantifying GHG mitigations that result from project-based activities, including requirements for…*

- *Establishing GHG accounting boundaries.*
- *Estimating baseline emissions.*

- *Determining project-case emissions.*
- *Monitoring project activities.*]

Please see section 1.3, Reference Standards, for further description of how ICR incorporates sustainability principles and criteria throughout its operations and requirements.

2023 - application

a) ICR uses sustainable development criteria.

It is paramount to rely on credible offsetting mechanism to support the goals of the Paris Agreement and those of the United Nations for Sustainable Development. To ensure such credibility, ICR relies on requirements and its operation on reference standards that sets out the principles and criteria for sustainable development, such as the ISO 14060 family of standards. In this way, ICR ensures that registered projects are following globally acknowledged sustainable development criteria, where monitoring, reporting and verification of GHG mitigations are in accordance with high integrity standards.

Please see section 1.3, Reference Standards, for further description of how ICR incorporates sustainability principles and criteria throughout its operations and requirements. Moreover, please see introduction of ICRs requirement document, where values and aims regarding sustainable development are discussed.

b) ICR does have provisions in place for monitoring, reporting, and verification in accordance with the sustainability criteria. All requirements in the ICR requirement document are based on the ISO 14060 family of standards amongst other GHG programs established on sustainable development criteria.

   [*The ISO 14060 family of standards provides clarity and consistency for quantifying, monitoring, reporting, and validating and verifying GHG mitigations to support sustainable development through a low-carbon economy and benefit organizations, project proponents, and interested parties worldwide*.]

   And:

   [*All standards contain consistent general requirements for quantifying GHG mitigations that result from project-based activities, including requirements for…*

   - *Establishing GHG accounting boundaries.*
   - *Estimating baseline emissions.*
   - *Determining project-case emissions.*
   - *Monitoring project activities.*]

Further, all projects are subject to validation and mitigations subject to verification relying on ISO 14064-3 and ISO 14065 and ISO 14066.

Under section 1.14 in the ICR project design description proponents can address other benefits of project activities and how they are monitored.

Please see section 1.3, Reference Standards, for further description of how ICR incorporates sustainability principles and criteria throughout its operations and requirements.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.

https://documentation.carbonregistry.com/documentation/

a. In addition to information from last submission ICR has improved PDD and MR template to allow proponents to share information about SDG or other benefits in greater details. The full contents of these viewed using the respective links below.

   ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.2.1
   Project design description (PDD) - ICR Program (carbonregistry.com)
   Monitoring report (MR) - ICR Program (carbonregistry.com)

b. In section section 1.9 in moniotoring report template detailed information is required about current contributions and lifetime contributions is required to be disclosed. In late 2023 ICR issued the ICR validation and verification specifications. Its purpose is to guide VVBs in assessing requirements from the ICR requirement document and complement ISO 14064-3.

Question 3.11 Avoidance of double counting, issuance and claiming

Does the programme use sustainable development criteria? (*Paragraph 2.10*)	☒ YES
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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR use sustainable development criteria.

   Please see question 3.10 above for a description of how the program applies sustainable development criteria. As mentioned, for further description of how ICR incorporates sustainable development criteria in its operations and requirements, please see section 1.3, Reference Standards, for further description of how ICR incorporates sustainability principles and criteria throughout its operations and requirements.

b) ICR provides 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.

In order to avoid double accounting, projects shall not be included in any other voluntary or compliance GHG program. Also, if the project boundary overlaps with another GHG program of a similar nature. In that case, the Project proponent shall demonstrate in the PDD, and at validation and verification, that there is no double accounting of impacts completing PDD and at validation and verification. During the registration process, ICR conducts verification that no other project has been listed in other GHG Program registries in the same location or demarcated boundary under the same project type.

ICR allows projects registered under an approved GHG program to also register with the ICR. In such cases, the documentation required for the project registration process is the same as required for projects registering under the ICR requirements, subject to limitations. The ICR program allows further projects registered under an approved GHG program to cancel carbon credits issued under the approved GHG program and have them issued as ICCs in the ICR registry. If projects have created another form of GHG-related environmental instruments, such as renewable energy certificates, evidence shall be provided to ICR demonstrating that the mitigations outcomes presented for ICCs issuance have not also been recognized as another GHG-related environmental instrument or that any such instrument has not been used and have been cancelled under the relevant program.

Further, see section 8 in ICR Process Requirements and Appendix D, *Emissions Unit Programme Registry Attestation* for registry platform functionalities preventing double counting, issuance and claiming.

2023 - application

a) ICR use sustainable development criteria.

Please see question 3.10 above for a description of how the program applies sustainable development criteria. As mentioned, for further description of how ICR incorporates sustainable development criteria in its operations and requirements, please see section 1.3, Reference Standards, for further description of how ICR incorporates sustainability principles and criteria throughout its operations and requirements.

b) ICR provides 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.

Project proponents shall not issue instruments for the same GHG emission mitigations under ICR and another GHG program. Projects may, however, apply for transfer of registration to ICR. If transferring, all previous documentation regarding the project activities shall be made available for ICR and the VVB. Transitioning projects are identified in the ICR registry. Further if a statement on non-double issuance of same mitigation is required. Transitioning projects are subject to gap-validation of conformity to ICR requirements.

If project boundary overlaps with another GHG program of a similar nature. In that case, the project proponent shall demonstrate in the PDD, and at validation and verification, that there is no double counting of impacts completing PDD and at validation and verification. During the registration process, ICR conducts verification that no other project has been listed in other GHG program registries in the same location or demarcated boundary under the same project type.

If projects have created another form of GHG-related environmental instruments, such as renewable energy certificates, evidence shall be provided to ICR demonstrating that the mitigations outcomes presented for ICCs

issuance have not also been recognized as another GHG-related environmental instrument or that any such instrument has not been used and have been cancelled under the relevant program.

Further on the issue of double counting. In VCMs double claiming will exist and has reference to claims made by organisations on offsetting and retirement of instruments related to them. The CEO of ICR chaired a technical committee on carbon offsetting within Icelandic Standards Organization commencing in issuance of a technical specifications on carbon offsetting (ÍST 92:2022). There offsetting is addressed for the whole value chain of mitigation actions relying on ISO 14060 series of standards and in particular ISO 14064-1 and 14064-2. There organizations are encouraged to disclose the nature of their claims.

[*5.2.5 Claims*
Organizations should disclose the nature of their compensation claims. Claims may be

1. *supporting the NDC of host-country of the GHG project, i.e., non ITMO.*
2. *supporting the NDC of the organizations domicile i.e., ITMO, or*
3. *not supporting NDCs when organizations voluntarily retire ITMO credits or*
4. *supporting GHG project implementations and credits generated lie outside of the scope of the host-country NDC.*]

For the purpose of addressing different claims ICR has implemented in the serialization of credits if their mitigations are claimed by the host-country, see Appendix D on serialization structure. Further from additionality benchmarking (level 5) of projects, 4) is addressed where mitigations go beyond NDCs. See section 4.4.1 in the ICR requirement document.

Where host country approval has been granted the ICR will transparently provide to relevant authorities and registries information on credits issued for different monitoring periods for different projects for which letter of authorization have been issued from host countries so they can do a corresponding adjustments for such credits/mitigations.

Further, see section 6 in ICR process requirements, 3.8 in ICR requirement document and Appendix D, *Emissions Unit Programme Registry Attestation* for registry platform functionalities preventing double counting, issuance and claiming.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.

https://documentation.carbonregistry.com/documentation/

a. N/A
b. In addition to the information provided in the previous submission, ICR has updated the ICR requirement document and the definitions related to it. Now, terms such as 'double counting,' 'issuance,' and 'claiming' are all explicitly defined. Moreover, Section 3.8 of the ICR document outlines detailed requirements concerning double counting, issuance, and claiming. For projects that are seeking host country attestation, Section 3.10 delineates the requirements for the corresponding adjustment form. ICR has also developed a template that is consistent with Decision 2/CMA.3 for the attestation and approval by the host country. In

the ICR Project Design Document (PDD) template, there is a designated section that specifically addresses issues of double counting, issuance, and claiming.
This update is also pertinent to claims made by organizations using International Carbon Credits (ICCs), as mentioned in the previous submission.

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 3.8 and 3.10
Project design description (PDD) - ICR Program (carbonregistry.com)
Letter of attestation - ICR Program (carbonregistry.com)
Compensation - ICR Program (carbonregistry.com)

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICRs carbon offsets represent GHG emissions reductions, carbon sequestration, or removals that exceed any GHG reduction or removals required by law, regulation, or legally binding mandate. Additionality is one of the principles that all projects submitted for registration must adhere to.

Project proponents shall demonstrate additionality of the project following the approved and applied methodology. ICRs criteria of additionality are laid out in section 5.5 in the ICR Requirement Document. ICR relies on already established principles, where the additionality principles from CDM and other GHG programs have been used as a reference point. Provision of sufficient evidence for additionality is incorporated throughout ICRs documentation.

ICRs approach is that additionality is only recognized for project activities that would not have "happened anyway", and where ICR requires demonstration of a positive outcome of legal requirement test and additionality test based

on a positive list or project specific test. ICR requires that project proponents conduct a minimum of one out of three additionality tests. Criteria for these financial, technological, and institutional tests, are listed later in this section.

Validation of the project is conducted by a VVB as outlined in the ICR Requirement Document. The VVB assesses the project design and monitoring plan for the project's conformity to the eligibility principles and other requirements, i.e., ISO 14064-2 and ICR requirements, methodological requirements, and other normative requirements. Additionality is one of the requirements outlined in applied methodology and/or ICR Requirement Document which the VVB assesses during validation.

2023 - application

a) and b)

Project proponents need to demonstrate additionality of projects. Additionality represents a net environmental benefit and real mitigation of GHG emissions in excess of the baseline scenario. The concept of additionality is a vital consideration for quantifying project-based GHG emissions mitigation. Additionality shall be demonstrated with a positive outcome of a project-specific additionality test. ICR defines additionality as a multilevel principle, ranging from Level 1 to Level 5, where these levels are laid out as follows:.

Level 1 additionality – ISO 14064-2 GHG emissions additionality

GHG emission mitigations shall be additional to the baseline scenario. ISO 14064-2 addresses additionality as the project proponent shall select or establish, justify, and apply criteria and procedures for demonstrating that the project results in GHG emissions mitigations that are additional to what would occur in comparison to the determined GHG baseline.

Level 2a additionality – Statutory additionality

The project shall implement actions that go beyond statutory requirements. Projects are statutory additional if their implementation and/or operation is not required by any law, statute, or other regulatory framework, agreements, settlements, or other legally binding mandates requiring implementation and operation or requiring implementation of similar measures that would result in the same levels of GHG emission mitigations in the host country.

Level 2b additionality – Non-enforcement additionality

Projects are non-enforcement additional if their implementation and/or operation is subject to statutory requirements that are systematically not enforced and where non-compliance with those requirements is widespread in the host country.

Level 3 additionality – Technology, institutional, common practice additionality

The project shall implement climate actions that are subject to barriers to implementation or accelerate the deployment of technology or activities.

Projects may be technology, institutional, or common practice additional if it faces significant organizational, cultural, social, or technological barriers to implementation, where carbon market incentives are essential in overcoming these barriers. These barriers may be a lack of trained personnel, supporting infrastructure for implementation, logistics for maintenance, and lack of knowledge on practices. The project activity may lead to accelerated technology deployment that would unlikely have occurred otherwise. If an action can demonstrate the promotion of an accelerated deployment of a technology that would otherwise face difficulties and have slower penetration, then it is assumed that the increased rate results in increased GHG emissions mitigations.

Level 4a additionality – Financial additionality I
Projects are considered Level 4a additional if they face financial limitations that can be mitigated by revenues from the sale of carbon credits where carbon credit revenues are reasonably expected to incentivize the implementation of projects or carbon credit revenues important in maintaining the projects' operations' ongoing financial viability post-implementation.

A project is Level 4a financially additional if the project activity results in higher costs or relatively lower profitability than would have otherwise occurred in the baseline scenario.

Level 4b additionality – Financial additionality II
Projects are considered Level 4b additional if they face significant financial limitations that can be avoided by revenues from the sale of carbon credits where carbon credit revenues are the major or only source of revenues and carbon credit revenues are a precondition for the implementation of the project and/or carbon credits revenues are essential in maintaining the project operations and ongoing financial viability post-implementation.

Level 5 additionality – Policy additionality
Projects are considered Level 5 additional if their implementation goes beyond its host country's climate objectives and lies outside the scope of the climate action strategy towards the host country's NDCs.

ICRs criteria of additionality are laid out in section 4.4.1 in the ICR Requirement Document. ICR relies on already established principles, where the additionality principles from CDM and other GHG programs have been used as a reference point. Provision of sufficient evidence for additionality is incorporated throughout ICRs documentation.

Validation of the project is conducted by a VVB as outlined in the ICR Requirement Document. The VVB assesses the project design and monitoring plan for the project's conformity to the eligibility principles and other requirements, i.e., ISO 14064-2 and ICR requirements, and other normative requirements. Additionality is one of the requirements outlined in the ICR requirement document which the VVB assesses during validation.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available links.

https://documentation.carbonregistry.com/documentation/

Since the last submission the required levels of additionality are level 1, 2 and at least 3,4 or 5.

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Additionality and baseline-setting for a project seeking to be registered with ICR is assessed by an accredited and independent third-party verification entity.

Following the reference standards, ICR has enforced, additionality principles and estimating baseline emissions and how those are to be assessed are well entrenched in ICRs overall requirements and forms. Requirements regarding baseline scenario-setting are described in sections 5.6 and 5.7 in ICRs Requirement Document. The ICR Requirement Document states that project proponents, applying a conservative approach, should establish, describe, and apply criteria and procedures to identify, determine, and justify the GHG baseline scenario according to methodology requirements. Further, the third-party VVB validates application of methodology for the project, thus the baseline scenario.

To ensure that additionality principles are evident and legitimate, in addition to requirements, PDD template request a demonstration of how the project can demonstrate its additionality. Furthermore, the validation report and verification report templates clearly state that additionality shall be assessed to ensure reliability. As outlined above, the VVB assesses all requirements set out in ISO 14064-2, ICR Requirement Document, methodological requirements, and other applicable normative requirements. ICR does not conduct an assessment of additionality and baseline scenario on a project level. However, following the ICR Methodology Approval Process, additionality and baseline determination at a methodological level are assessed. See further sections 5.6 and 5.7. in the ICR Methodology Requirements and ICR Methodology Approval Process.

2023 - application

Additionality and baseline-setting for a project seeking to be registered with ICR is assessed by an accredited and independent third-party verification entity.
Following the reference standards, ICR has enforced, additionality principles and estimating baseline emissions and how those are to be assessed are well entrenched in ICRs overall requirements and forms. Requirements regarding baseline scenario-setting are described in sections 4.4 in ICRs Requirement Document and further in section 6.4 in ISO 14064-2. The ICR requirement document states that project proponents, applying a conservative approach, should establish, describe, and apply criteria and procedures to identify, determine, and justify the GHG baseline scenario according to methodology requirements. The ISO 14064-2 states that

[*The project proponent shall select or establish criteria and procedures for identifying and assessing GHG SSRs controlled, related to or affected by the project.*
Based on the selected or established criteria and procedures, the project proponent shall identify GHG SSRs relevant to the project as being:
a) controlled by the project proponent;
b) related to the GHG project; or
c) affected by the GHG project.]

Further, the third-party accredited VVB validates how the baseline has been determined following ISO 14064-3.

To ensure that additionality principles are evident and legitimate, in addition to requirements, PDD template request a demonstration of how the project can demonstrate its additionality. Furthermore, the validation report and

verification report templates clearly state that additionality shall be assessed to ensure reliability. As outlined above, the VVB assesses all requirements set out in ISO 14064-2, ICR requirement document, methodological requirements, and other applicable normative requirements. ICR does not conduct an assessment of additionality and baseline scenario on a project level. In the ICR methodology approval process, additionality and baseline are determined at a methodological level and assessed. See further sections 4.6 and 5.6. in the ICR methodology requirements and ICR methodology approval process.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In addition to the information provided in the last submission:

In late 2023 ICR issued a new document focusing on validation and verification. ICR validation and verification specifications. In that document ICR provides specifications on validation and verification on ICR specific requirements, i.e. where ISO 14064-3 lacks guidance, see:

ICR validation and verification specifications v1.0 - ICR Program (carbonregistry.com)
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)

It's important to keep in mind the trust chain of validation/verification/certification and accreditation.

Relating to ICR review of the ICR program ICR wants to bring focus on the core principles embedded within the ISO 17029/14065 accreditation standards. These principles are foundational to ensuring the integrity, transparency, and reliability of the accreditation process. By adhering to these standards, organizations commit to upholding high levels of impartiality, competence, and consistency in their operations. The ISO 17029/14065 framework emphasizes the importance of a systematic approach to quality management, ensuring that all activities are conducted with a commitment to excellence and continuous improvement. Engaging with these principles not only enhances the credibility of the accreditation but also reinforces the trust stakeholders place in their capabilities to deliver services that meet or exceed the established international benchmarks.

Principles of standards establish the overall mission of the standard. From ISO 17029 in section 4.

[4.1 General

> 4.1.1 The principles described in this clause provide the basis for the requirements specified in this document. These principles should be applied as guidance for decisions that sometimes need to be made for unanticipated situations. Principles are not requirements.
>
> 4.1.2 The overall aim of validation/verification is to give confidence to all parties that a validated/ verified

claim fulfils the specified requirements. The value of validation/verification is the confidence that is established by an impartial evaluation by a competent validation/verification body.

4.1.3 Parties that have an interest in validation/verification include, but are not limited to:

a) clients of the validation/verification bodies;
b) programme owners;
c) users of the validated/verified claims;
d) regulatory authorities.

4.2 Principles for the validation/verification process

4.2.1 Evidence-based approach to decision making

The process deploys a method for reaching reliable and reproducible validation/verification conclusions and is based on sufficient and appropriate objective evidence. The validation/verification statement is based on evidence collected through an objective validation/verification of the claim.

4.2.2 Documentation

The validation/verification process is documented and establishes the basis for the conclusion and decision regarding conformity of the claim with the specified requirements.

4.2.3 Fair presentation

Validation/verification activities, findings, conclusions and statements, including significant obstacles encountered during the process, as well as unresolved, diverging views between the validation/ verification body and the client are truthfully and accurately reflected.

4.3 Principles for validation/verification bodies

4.3.1 Impartiality

Decisions are based on objective evidence obtained through the validation/verification process and are not influenced by other interests or parties.

Threats to impartiality can include but are not limited to the following.

a) Self-interest: threats that arise from a person or body acting in their own interest. A concern related to validation/verification, as a threat to impartiality, is financial self-interest.
b) Self-review: threats that arise from a person or body reviewing the work done by themselves.
c) Familiarity (or trust) : threats that arise from a person or body being too familiar with or trusting of another person instead of seeking evidence for validation/verification body, and not the validation/verification body, has the responsibility for the claim and its conformity with the applicable specified requirements. The validation/verification body has the responsibility to base a validation/verification statement upon sufficient and appropriate objective evidence.

4.3.6 Responsiveness to complaints

Parties that have an interest in validation/verification have the opportunity to make complaints. These complaints are appropriately managed and resolved. Responsiveness to complaints is necessary in order to

demonstrate integrity and credibility to all users of validation/verification outcomes.

4.3.7 Risk-based approach
Validation/verification bodies need to take into account the risks associated with providing competent, consistent and impartial validation/verification. Risks can include, but are not limited to, those associated with:

a) the objectives of the validation/verification and the programme requirements;
b) competence, consistency and real as well as perceived impartiality;
c) legal, regulatory and liability issues;
d) the client organization, where validation/verification is being carried out, and its management system, operating environment, geographic location, etc.;
e) the susceptibility of any parameter included in the claim to generate a material misstatement, even if there is a control system implemented;
f) the level of assurance to be achieved and the corresponding evidence-gathering used in the validation/verification process;
g) perception of interested parties;
h) misleading claims or misuse of marks by the client;
i) risk control and opportunities for improvement.]

And from ISO 14065

[4.4 Conservativeness
When the body assesses comparable alternatives, preference is given to the alternative that is cautiously moderate.

4.5 Professional scepticism
Attitude based on recognition of the potential circumstances able to cause material misstatements in an environmental information statement.

NOTE ISO 14066:2011, Annex A, provides guidance on evidence and the application of professional scepticism. This annex applies equally to the validation and verification of all environmental information.]

The ICR requirements document reflects the principles as delineated in section 2, closely aligning with the rigorous standards of ISO 14065. ABs conduct periodic audits of VVBs to ensure adherence to their established procedures and the fundamental principles of ISO 14065, such as impartiality, competence, and consistency.

All VVBs collaborating with ICR maintain their accreditation status with their respective ABs, underscoring their ongoing compliance with the high standards set forth by international accreditation guidelines. This continued accreditation is a testament to the VVBs' commitment to quality and integrity in their operations.

ICR conducts a review of all validation and verification reports and shares with VVBs any concerns, comments or findings. ICR believes in the trust chain of validation and verification, and accreditation. Therefore ICR relies on the validation/verification opinion issued by the VVB and does not second guess the opinion as that would be a threat to impartiality of the program.

See further
ISO 14064-3
ISO 17029
ISO 14065
IAF MD6
ICR requirement document (principles)

Note ICR is currently establishing partnerships with accreditation bodies to include the ICR program in their accreditation systems. ICR intends to complete the partnership in Q4 and require a partnership agreement with all ABs (ISO 14065) of current VVBs by the end of year 2024.

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICRs policies and procedures for methods that the program uses to support, analyze, and demonstrate that credited mitigation is additional, applicable at project and/or program-level, are described in ICRs Requirement Document.

Legal requirement test
Projects are not additional if any law requires their implementation and/or operation, statute, or other regulatory framework, agreements, settlements, or other legally binding mandates requiring implementation and operation, or requiring implementation of similar measures that would result in the same levels of GHG emissions mitigations in the host country.

ICRs additionality test: Three project-specific tests

Financial:

1. Do the project face financial limitations where revenues from trading carbon credits could mitigate those limitations?
2. Are carbon credit revenues reasonably expected to incentivize implementation of the project?

3. Are carbon credit revenues essential in maintaining the project operations´ ongoing financial viability post-implementation?

Technological:

4. Does the project face significant technological barriers such as lack of trained personnel, supporting infrastructure for implementation, logistics for maintenance, lack of knowledge about practices, and are car market incentives essential in overcoming these barriers?

Institutional:

5. Does the project face significant organizational, cultural, or social barriers to implementation, and are carbon market incentives a key element in overcoming these barriers?

If a project faces more than one of the above implementation barriers proponents may choose to fulfil several, or all, of the above criteria/tests.

2023 - application

Project proponents shall demonstrate the project's additionality and at a minimum conform to levels 1, 2, and 3. However, the project may demonstrate if it conforms to supplementary additionality levels. When applying a methodology, the project proponent should follow additionality testing guidelines.

For additionality testing, project proponents may apply the latest version of: CDM Tool for demonstration and assessment of additionality; Combined tool to identify the baseline scenario and demonstrate additionality; Positive lists of technologies; or other tools from a recognized origin.

For policy additionality, the project proponent shall rely on and refer to the host country's current NDC. Projects are labeled with their additionality levels in the ICR registry platform.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
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https://documentation.carbonregistry.com/documentation/

In ICR revision to the ICR requirement document ICR revised the additionality threshold.

Project proponents shall demonstrate the project's additionality and, at a minimum, meet level 1, and either 2a or 2b. They shall also meet one additional level from 3, 4 or 5. However, the project may demonstrate if it conforms to other additionality levels. When applying a methodology, the project proponent should follow additionality testing guidelines.

In addition to information provided in last submission In late 2023 ICR issued a new document focusing on validation and verification. ICR validation and verification specifications. In that document ICR provides specifications on validation and verification on ICR specific requirements, i.e. where ISO 14064-3 lacks guidance,

e.g. on additionality benchmarks, see:

ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.4.1
ICR validation and verification specifications v1.0 - ICR Program (carbonregistry.com)

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*)
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR does not use other methods than the ones above in the above question, limited to when projects apply methodologies referring to specific additionality testing.

2023 - application
N/A

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

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https://documentation.carbonregistry.com/documentation/

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR does not designate certain activities as automatically additional. Additionality has to be demonstrated for all projects prior to registering with ICR, limited to applying approved methodologies referring to automatic additionality.

2023 - application

ICR does not designate certain activities as automatically additional. Additionality has to be demonstrated for all

projects prior to registering with ICR as to address the additionality benchmark referred to above.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

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*)
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR believes in providing projects with transferable instruments in the form of carbon credits representing real and verified mitigation outcomes and that such outcome is transparent in terms of their time-relevance and when they take effect. That will support the scaling of climate actions.

In general, climate projects and methodologies are required to fulfil the requirements of ISO 14064-2. The validation of projects and methodologies and verification of mitigation outcomes shall be according to the current versions of ISO 14064-3, ISO 14065 and ISO 14066. Establishing ICRs requirement on principles, requirements, and guidance laid out in these and established GHG programs, ICCs are carbon credits representing GHG emission reduction or carbon sequestration or removals that exceed any greenhouse gas reduction or removals that would otherwise occur in a conservative, business-as-usual scenario and may be used by organizations and/or individuals for offsetting emissions.

ICR has procedures to assess and test for additionality providing reasonable assurance that the respective emissions reductions would not have occurred in the absence of the ICR or other GHG programs. Real and transparent emissions mitigations that are additional are ensured through a robust and publicly disclosed framework and set of requirements based on already established principles and standards in the sector validated by an accredited VVB.

The reliability and trustworthiness of additionality principles and baseline-setting are further enhanced and ensured through assessment by an accredited and independent third-party VVB.

Please see the following sections in ICRs Requirement Document for an extensive description of how the principles are incorporated:

Section 1.3, *Reference Standards*
Section 5.5, *Additionality and the subsections Legal requirement test and Additionality test*
Section 5.6, *Baseline*

2023 - application

ICR believes in providing projects with transferable instruments in the form of carbon credits representing real and verified mitigation outcomes and that such outcome is transparent in terms of their time-relevance and when they take effect. That will support the scaling of climate actions.

In general, climate projects and methodologies are required to fulfil the requirements of ISO 14064-2. The validation of projects and verification of mitigation outcomes shall be according to the current versions of ISO 14064-3, ISO 14065 and ISO 14066. Establishing ICRs requirement on principles, requirements, and guidance laid out in these and established GHG programs, ICCs are carbon credits representing GHG emission reduction or carbon sequestration or removals that exceed any greenhouse gas reduction or removals that would otherwise occur in a conservative, business-as-usual scenario and may be used by organizations and/or individuals for offsetting emissions.

ICR has procedures to assess and test for additionality providing reasonable assurance that the respective emissions reductions would not have occurred in the absence of the ICR or other GHG programs. Real and transparent emissions mitigations that are additional are ensured through a robust and publicly disclosed framework and set of requirements based on already established principles and standards in the sector validated by an accredited VVB.

The reliability and trustworthiness of additionality principles and baseline-setting are further enhanced and ensured through assessment by an accredited and independent third-party VVB.

CDM, which multiple voluntary carbon standards rely on application of methodologies, additionality criteria and tools developed by CDM to supplement their own standards and promote integrity. Thousands of projects globally that have used Additionality tools and methodologies derived from the CDM, projects under the the ICR framwork that relies on the same principles should therefore be considered additional. In addition to the above by benchmarking additionality and labelling projects based on additionality level provides both project proponents to demonstrate how their solutions differ from others, e.g. sectors comparison.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
N/A

Question 4.2 <u>Are based on a realistic and credible baseline</u>

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:
2022 - application

a) The ICR has established procedures to issue emission units against realistic, defensible, and conservative baseline estimations of emissions.

To ensure that baseline scenario is plausible and conservative, monitoring report, verification report, validation report, and the PDD call for extensive details about, among other, estimated baseline as of year one and throughout the project, how the baseline is applied, steps taken to assess the determination of the baseline scenario, and validation of the quantification method, and accuracy and correspondence of data. For determination of baseline, the project proponent shall provide a transparent calculation of baseline emissions, project emissions (or, where applicable, direct calculation of emission reductions), and leakage emissions expected during the project's crediting period, applying all relevant equations provided in the applied methodology, applied standardized baselines other applied documents. More details about what the project proponents shall adhere to are outlined in ICRs Project Design Description Template, which the project proponent shall follow. A VVB assesses the set baseline scenario for validation and verification purposes, rooted in the requirements and reference standards ICR has implemented as the framework. In this way, credits are issued against realistic, defensible, and conservative baseline estimations of emissions.

Please see section 5.6 in ICRs Requirement Document for further description of the baseline setting. Further, please see section 5.7, *Identification of Relevant GHG SSRs to the Baseline,* for a description of project proponents' requirements toward inclusion and exclusion of relevant emissions and use of methods.

b) ICR does publicly disclose baselines and underlying assumptions.

Baselines and underlying assumptions shall be described throughout the underlying project and activity documents, such as PDD, validation, verification, and monitoring report, which are publicly disclosed in the registry under the respective project. To see such documentation, go to projects under registry on ICRs website and view project. Projects are available here: https://iceland.itmoregistry.net/Public/Project

Please see ICRs templates for further descriptions about how baselines and underlying assumptions shall be included in the project and activity documentation. All templates and relevant documentation are available here: https://carbonregistry.com/templates/

1. Project Design Description
2. Monitoring Report
3. Validation Report
4. Verification Report

For projects activities submitting new methodology proposals:

1. Methodology Description
2. Concept Note

When the ICR Board has approved a methodology, the new approved methodology is published on the ICR website as discussed in section 3.7 in the ICR Methodology Approval Process.

2023 - application

a) The ICR has established procedures to issue emission units against realistic, defensible, and conservative baseline estimations of emissions.

To ensure that baseline scenario is conservative, monitoring report, verification report, validation report, and the PDD call for extensive details about, among other, estimated baseline throughout the project, how the baseline is applied, steps taken to assess the determination of the baseline scenario, and validation of the quantification criteria and procedures, and accuracy and correspondence of data. For determination of baseline, the project proponent shall provide a transparent calculation of baseline emissions, project emissions (or, where applicable, direct calculation of emission reductions), and leakage emissions expected during the project's crediting period, applying all relevant equations provided in the applied methodology, applied standardized baselines other applied documents. More details about what the project proponents shall adhere to are outlined in ICRs project design description template, which the project proponent shall follow. A VVB assesses the set baseline scenario for validation and verification purposes, rooted in the requirements and reference standards ICR has implemented as the framework. In this way, credits are issued against realistic, defensible, and conservative baseline estimations of emissions.

Please see section 6.4 in the ISO 14064-2 *Determining the GHG baseline* and section 6.6 *Identifying GHG SSRs relevant to the baseline scenario* and section 4.4 in ICRs requirement document for further description of the baseline setting. Further, please see section 4.5, *Identifying GHG SSRs Relevant to the Baseline Scenario,* for a description of project proponents' requirements toward inclusion and exclusion of relevant emissions and use of methods.

b) ICR does publicly disclose baselines and underlying assumptions.

Baselines and underlying assumptions shall be described throughout the underlying project and activity documents, such as PDD, validation, verification, and monitoring reports, which are publicly disclosed in the registry under the respective project.

Please see ICRs templates for further descriptions about how baselines and underlying assumptions shall be included in the project and activity documentation. All templates and relevant documentation are available here: https://carbonregistry.com/explore-our-program/

1. Project design description
2. Monitoring report
3. Validation report
4. Verification report
5. Validation and verification report

For projects activities submitting new methodology proposals:

1. Methodology Description
2. Concept Note

When the ICR Board has approved a methodology, the new approved methodology is published on the ICR website as discussed in section 4.6 in the ICR Methodology Approval Process.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previos application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

See further:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)

Templates - ICR Program (carbonregistry.com)
Templates that project proponents and validation and verification bodies need to use for the documentation of climate projects.
Templates - ICR Program (carbonregistry.com)
Templates that validation and verification bodies need to use for the documentation of climate projects.

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

For methods developing baselines, the ICR Methodology Requirements set out requirements for baselines.
The methodology shall require the application of one of the following approach(es) for determining the baseline, accompanied with justification for the appropriateness of the choices: A performance-based approach, taking into account:

a) Best available technologies that represent an economically feasible and environmentally sound course of action, where appropriate;
b) An ambitious benchmark approach where the baseline is set at least at the average emission level of the best performing comparable activities providing similar outputs and services in a defined scope in similar social, economic, environmental, and technological circumstances;
c) An approach based on actual or historical emissions, adjusted downwards to encourage ambition over time.

Further, for baseline, methodologies may utilize tools approved under the CDM.

Methodologies shall determine the project boundary and the GHG SSRs and justify any inclusion or exclusion. The boundary shall include GHG SSRs controlled by the project proponent and GHG SSRs related to or affected by the project activity.

The ICR program sets out requirements for project activities for baseline scenario determination. The project proponent shall select or establish, describe, and apply criteria and procedures to identify, determine, and justify the GHG baseline scenario. In developing the baseline scenario, project proponents shall justify assumptions, values, and procedures so that the most plausible baseline scenario leads to a conservative estimation of GHG emission reductions. When applying an approved methodology, the project proponent should establish and describe the baseline scenario according to the applied methodology's requirements. See further in sections 5.6 and 5.7 in the ICR Requirement Document.

For proposals for new methodologies to be approved, they must be validated and projects as well where methodologies and projects are assessed for conformity to the requirements and ISO 14064-2.

This is discussed in section 6 in the ICR Requirement Document and section 7 in the ICR Methodology Requirements available on the ICR website: https://carbonregistry.com/templates/

2023 – application

For approach for developing baselines, the ICR methodology requirements set out requirements for baselines.
A performance-based approach, taking into account the following:

i. Best available technologies that represent an economically feasible and environmentally sound course of action, where appropriate;
ii. An ambitious benchmark approach where the baseline is set at least at the average emission level of the best performing comparable activities providing similar outputs and services in a defined scope in similar social, economic, environmental, and technological circumstances;
iii. An approach based on actual or historical emissions, adjusted downwards to encourage ambition over time.

For the baseline scenario, methodologies may utilize tools approved under the CDM.

Methodologies shall include how to determine the boundary and the GHG SSRs with justification of any inclusion or exclusion. The boundary shall include GHG SSRs controlled by the project proponent and GHG SSRs related to or affected by the project activity. From ISO 14064-2 project proponents shall when considering identification of the GHG SSRs relevant to the baseline scenario:

a. consider criteria and procedures used for identifying the GHG SSR relevant to the project;
b. if necessary, explain and apply additional criteria for identifying relevant GHG SSRs;
c. compare the project's identified GHG SSR with those identified in the baseline scenario.

The ICR program sets out requirements for project activities for baseline scenario determination. The baseline scenario represents activities and GHG emissions that are most likely to occur in the absence of the project activity. The project proponent shall select or establish, describe, and apply criteria and procedures to identify, determine, and justify the GHG baseline scenario. The baseline scenario shall be accurately determined so that an accurate comparison can be made between the GHG emissions that would have occurred under the baseline scenario and the GHG emission mitigations achieved by project activities. In developing the baseline scenario, project proponents shall justify assumptions, values, and procedures so that the most plausible baseline scenario leads to a conservative estimation of GHG emission mitigations. See further in sections 4.4 and 4.5 in the ICR requirement document.

For proposals for new methodologies to be approved, they must be validated and projects as well where methodologies and projects are assessed for conformity to the requirements and ISO 14064-2.

The ISO 14064-2 sets requirements for the baseline in section 6.4 and 6.5
[6.4:
The project proponent shall select or establish criteria and procedures for determining the GHG baseline considering the following:
a) the project description, including identified GHG SSRs (see 6.3);

b) existing and alternative project types, activities and technologies providing equivalent type and level of activity of products or services to the project;
c) data availability, reliability and limitations;
d) other relevant information concerning present or future conditions, such as legislative, technical, economic, socio-cultural, environmental, geographic, site-specific and temporal assumptions or projections.
The project proponent shall demonstrate functional equivalence in the type and level of activity of products or services provided between the project and the baseline scenario and shall explain, as appropriate, any significant differences between the project and the baseline scenario.
....]

This is discussed in section 6 in the ICR requirement document and section 7 in the ICR methodology requirements available on the ICR website: https://carbonregistry.com/templates/

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

ICR has revised the ICR requirement document, and sections 6 and 7 are now under section 6, addressing validation in section 6.1 and verification in 6.2. Reference to sections 4.4 and 4.5 are still relevant.
See:

ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)
Templates - ICR Program (carbonregistry.com)
Templates - ICR Program (carbonregistry.com)
Templates - ICR Program (carbonregistry.com)

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

For new methodology proposals, there is an extensive process for the approval consisting of third-party validation of the methodology conducted by an accredited VVB and assessment and recommendation by the Program Advisory and Methodology Approval Panel comprised of carbon market and sector experts. Further, the methodology approval process is conducted for the purpose of consistency in the application of the methodology at the project level, the methodology developer shall design a project in accordance with the requirements of ISO 14064-2, the requirements of the proposed methodology, and the ICR Requirement Document. The process is

explained in the ICR Methodology Approval Process, available on the ICR website. This process ensures that the methods of developing baselines do not overestimate the mitigation from project activities applying the methodology.

The ICR has procedures in place for project activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration.

In general, project proponents are required to disclose all information regarding any deviation, such as changing baseline, to the VVB, regardless. This allows the VVB to assess if the deviation is material or not. This requirement is incorporated throughout ICRs requirements, given in the ICR Requirement Document.
For example, such requirements are described in

Section 5.15, *Deviation*

> [*Projects may deviate from the validated project design description in order to accommodate changing circumstances post-validation. All such deviations shall be described and assessed by VVB during the subsequent Verification for conformity to the requirements herein and ISO 14064-2. Project Design Description shall be updated accordingly*.]

Section 6.1.1, *Validation Process*

> […*If the project deviates from the applied methodology, the validation body shall determine if the deviation is material*]

And section 7.1, *Implementation, operation, and deviation*

> [*The Project shall be implemented and operated in accordance with the PDD… any short-term deviations from the PDD, applied methodologies, other applied documents, or permanent changes to the registered Project Activity…All deviations shall be reported in the updated version of the PDD and validated under the subsequent Verification*]

Section 8.1.1, *Verification Process*

> [*If the project implementation has deviated from the applied methodology from Validation, the VVB body shall conduct a Validation of the deviation and determine if the deviation is material*]

Further, these requirements have been incorporated in ICR templates for reporting the projects: Monitoring report, validation report, and verification report for unexpected deviation from the originally determined baseline scenario.

Monitoring Report Template
Section 3.2 requires any deviations from the PDD to be described, and section 3.3 requires any deviations from the methodology to be described.

Validation Report Template
Section 4.3, *Deviation from applied methodology*, requires any deviation from the applied methodology to be described.

Verification Report Template
In section 2.4, *Deviation from the applied methodology*, identification of any deviations from the applied methodology, and description of steps taken to verify each deviation are required.

In section 4.1, *Status of implementation*, it´s required that any previously validated deviations are to be listed (each verification report must contain an exhaustive list of all deviations applied to the project).

2023 - application
The ICR has procedures in place for project activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration.
In general, project proponents are required to disclose all information regarding any deviation, such as changing baseline, to the VVB. This allows the VVB to assess if the deviation is material or not. This requirement is incorporated throughout ICRs requirements, given in the ICR requirement document.
For example, such requirements are described in.

Section 6.1, *Validation*

> [*Projects may deviate from the validated project design description in order to accommodate changing circumstances post-validation. All such deviations shall be described and assessed by VVB during the subsequent verification for conformity to the requirements herein and ISO 14064-2. The project design description shall be updated accordingly.*]

Section 6.1.1, *Validation Process*

> […*If the project deviates from the applied methodology, the validation body shall determine if the deviation is material considering the requirements of ISO 14064-2 and the requirements herein.*]

And section 4.2, *Project Design Description – Describing the project*

> [*The project shall be implemented and operated conforming to the project design description. The project proponent shall indicate any short-term deviations from the project design description, applied methodologies, other applied documents, or permanent changes to the registered project activity. All deviations shall be reported in an updated version of the project design description and validated under subsequent verification.*]

Section 7.1.1, *Verification Process*

> [*If the project implementation has deviated from the validated project design description, the VVB body shall conduct a validation of the deviation and determine if the deviation is material.*]

In ISO 14064-2 this is also addressed in section 6.4 where it states that:

> [*The project proponent shall select or establish, describe and apply criteria and procedures for identifying and justifying the GHG baseline.*
> *The justification of the GHG baseline should take into account likely future behaviour of the baseline scenario (GHG SSRs) to meet the conservativeness principle…..*]

Further, these requirements have been incorporated in ICR templates for reporting the projects: Monitoring report, validation report, and verification report for unexpected deviation from the originally determined baseline scenario.

Monitoring report template
Section 1.3 requires any deviations from the PDD to be described, and section 4.2 requires any deviations from the methodology to be described.

Validation report template

Section 5.4.3, *Deviation from applied methodology*, requires any deviation from the applied methodology to be described.

Verification report template
In section 6.1.5 *Deviation from the project description* and 6.2.4, *Deviation from the applied methodology*, identification of any deviations from the PDD or the applied methodology, and description of steps taken to validated deviations are required.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

ICR has revised the ICR requirement document, and sections 6 and 7 are now under section 6, addressing validation in section 6.1 and verification in 6.2. References to sections 4.4 and 4.5 are still relevant. Section 1.3 is now section 1.7.1.1 in the newest MR template.

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)
Templates - ICR Program (carbonregistry.com)
Templates - ICR Program (carbonregistry.com)
Templates - ICR Program (carbonregistry.com)

Question 4.3 <u>Are quantified, monitored, reported, and verified</u>

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR has procedures in place to ensure that emissions units are based on accurate measurements and valid quantification methods/protocols.
Accurate measurements are ensured through ISO 14064-2, which is further ensured through validation and verification.

[*The ISO 14060 family of standards provides clarity and consistency for quantifying, monitoring, reporting, and validating and verifying GHG mitigations…*]

And:

[*All standards contain consistent general requirements for quantifying GHG mitigations that result from project-based activities, including requirements for…*
• Establishing GHG accounting boundaries.
• Estimating baseline emissions.
• Determining project-case emissions.
• Monitoring project activities.]

Please see section 1.3, *Reference Standards*, for further description of how ICR incorporates sustainability principles and criteria throughout its operations and requirements.

b) ICR has procedures to ensure that validation occurs prior to or in tandem with verification.
This is ensured through ICRs Requirement Documents and ICRs Process Requirements.
In section 6 in ICRs Requirement Document, *Validation*, it is provided that:

[*All projects are subject to Validation of projects*]

And:

[*Validation involves determining the project methodology and a project's eligibility to generate GHG Emissions Mitigations outcomes…. The evidence-gathering plan shall be sufficient so the validation body can provide a reasonable level of assurance*]

And:

[*Verification is the process for evaluating and independently determine if the outcome of the implementation of the Project and its activities and conformity to the ICR requirements based on historical data and information.*]

First verification of mitigation outcomes can however coincide with validation.

Further on,
In section 4.4.1, *Project Design Description for Validation*, it is stated that:

[*When Projects have been Early registered and/or when the PDD is completed, projects can undergo Validation*]

In section 4.4.2, *Validation of Projects*, in ICRs Process Requirements, it is provided that:

[*For projects to be eligible to be registered and Issue ICCs, the Validation process shall be completed. When Project proponents Issue ICCs after Validation of projects, they are Inactive and cannot be used (retired) for the purpose of offsetting…. ICCs can, however, be transferred when Inactive*]

[*Note that Issuance does not guarantee the Activation of ICCs....ICCs become active upon verification of impacts, conducted by an accredited VVB*]

Please see section 4.4 (*Registration and Issuance Process*), specifically section 4.4.1 (*Project Design Description for Validation*) and 4.4.2 (*Validation of Projects*), in the Process Requirements for a full description of the validation process steps and accompanying figures of the process steps.

A more general description of when validation shall be conducted can also be seen in the figures provided in section 4., *Project Cycle and the ICR,* in the Process Requirements.

The process of validation and verification is also described in section 5 in ISO 14064-2, which projects are subject to validation and verification to.

c) ICR has procedures in place to ensure that the results of validation and verification are made publicly available.

Results of validation and verification are made publicly available in ICRs registry platform, under projects. The documentation, verification reports, and validation reports can be found for each individual project in the registry platform.

Descriptions of what information shall be publicly disclosed and what information will not be publicly disclosed can be found in section 4.4.5, *Issuance of ICCs*, in ICRs Process Requirements. Among other documents, the monitoring report, validation report, and verification report are listed as documents that shall be published.

d) ICR has procedures to ensure that monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at specified intervals throughout the duration of the crediting period.

Results of monitoring are made publicly available in ICRs registry, under projects. The documentation of monitoring reports can be found for each project in the registry platform.

Descriptions of what information shall be publicly disclosed and what information will not be publicly disclosed can be found in section 4.4.5, *Issuance of ICCs*, in the ICRs Process Requirements. The monitoring report is listed as a document that shall be published.

For monitoring, there are requirements regarding the monitoring plan and monitoring as stated in sections 5.12 and 7.2 in the ICR Requirement Document.

[*The impacts of project activities on identified GHG SSRs shall be monitored in order to determine the net GHG benefits and for the purpose of activating ICCs that have been issued. The project proponent shall establish and maintain a monitoring plan for measuring or otherwise obtaining, recording, compiling, and analysing data and information important for quantifying and reporting GHG emissions and/or removals relevant for the Project and the baseline scenario. The monitoring plan shall be in line with the applied methodology and the requirements of ISO 14064- 2*.]

[*The project proponent shall monitor the Project Activity and its GHG Emission Mitigations in accordance with the Monitoring Plan. The impacts of project activities on relevant emission SSRs shall be monitored in order to determine net GHG Emission Mitigation*.]

Criteria regarding the length of the crediting period and the renewal of the project crediting period are set out in section 4.4, *Start Date and Crediting*, the ICR Requirement Document.

The project start date is the date when the project becomes operational and initiates its mitigation activity. Crediting periods for all project types, except AFOLU, is either ten years or a conservative estimate of the technical lifetime of the installed technologies or implemented measures and associated impacts. AFOLU crediting periods can differentiate as specified in the relevant methodology.

Moreover, section 5.17, *Crediting Period*, states that:

> [*ICCs are issued on an Ex-Ante basis (i.e., after Validation) and activated on an Ex-Post basis (i.e., after Verification) and only for GHG Emission Mitigations that occur within the Project crediting period*]

e) ICR has procedures to ensure that mitigation is measured and verified by an accredited and independent third-party verification entity.

Mitigation outcome is measured and verified by an accredited and independent third-party verification entity to ensure the quality of validation/verification assessment conducted by VVBs, the criteria are set out in the ICR Requirement Document and ICR Process Requirements or other guidance documents and informed to the VVB by ICR.

ICR ensures that mitigation is measured and verified by an accredited and independent third-party verification entity by requiring VVBs to fill out ICRs KYC and VVB Application Form. VVB Application Form asks VVBs to provide general information about the organization and accreditation details. The applicant shall also attest that the information presented in the application is true, accurate, and complete. Further, upon approval of the application, the VVB must sign an agreement with ICR for conducting validation and verification for ICR registered projects that, i.e., stipulates permission to review VVB´s performance of their validation/verification practices.

f) ICR has procedures to ensure that ex-post verification of mitigation is required in advance of issuance of emissions units.

Ex-post verification of mitigation is required in advance of issuance (activation) of emissions units is ensured through ICRs procedures. Please see section 5.17, *Crediting Period*, in ICRs Requirement Document, where the following is stated:

> [*After projects are registered, ICC credits are issued based on the amount GHG avoided, reduced, sequestered, or removed and reported by the project proponent and validated by an approved VVB and according to ICR Process Requirements. ICCs are issued on an Ex-Ante basis (i.e., after Validation) and* ***activated*** *on an* ***Ex-Post*** *basis (i.e., after Verification) and only for GHG Emission Mitigations that occur within the Project crediting period*.]

For the avoidance of doubt, **active** ICCs mean ICCs that have been verified that impacts are real and can be used for offsetting emissions, while **inactive** ICCs mean ICCs that have been issued in the ICR registry from a registered project that an approved VVB has validated, but mitigations have not been verified. Inactive ICCs cannot be retired and therefore not used as offsets by default in the registry platform. See definitions e.g., in ICR Process Requirements. However, ICCs may be issued ex-post where issuance and activation coincide.

2023 - application

a) ICR has procedures in place to ensure that emissions units are based on accurate measurements and valid quantification methods/protocols.

Accurate measurements are ensured through application of ISO 14064-2, which is further ensured through validation and verification.

[*The ISO 14060 family of standards provides clarity and consistency for quantifying, monitoring, reporting, and validating and verifying GHG mitigations*…]

And:

[*All standards contain consistent general requirements for quantifying GHG mitigations that result from project-based activities, including requirements for…*
• Establishing GHG accounting boundaries.
• Estimating baseline emissions.
• Determining project-case emissions.
• Monitoring project activities.]

In ISO 14064-2 establishes the criteria for measurements and quantity methods. In particular, section 6.3, 6.5, 6.6, 6.7 and 6.8. Further ICR has aligned its requirements and templates to align with the structure of ISO 14064-2.

To complement the requirements in the ISO 14064-2 ICR requirement document stipulates further requirements for measurements and quantification, e.g. in sections 4.7, 4.8 and 4.10.

From section 4.7:

[GHG emission mitigations achieved by the project activity and addressing leakage (GHG SSRs affected by the project) lay the foundation for the volume of ICCs that can be issued. Project proponents shall follow a methodology to quantify GHG emissions mitigations or establish criteria and procedures for the quantification. The quantification shall include all GHG SSRs identified and all GHGs and shall be reported in tCO2-e.
The project proponent shall estimate GHG emissions mitigations for selected GHG SSRs separately for:

1. *each relevant GHG for each GHG SSR relevant for the project;*
2. *each GHG SSR relevant for the baseline scenario.*

Net GHG emissions and/or removals generated by the project activities shall be quantified and reported.]

Further in section 4.8:

[Based on criteria from section 4.7, the project proponent shall select and follow criteria from a methodology or establish criteria and procedures for quantifying aggregated GHG emission mitigations during the implementation and operation of the project to undertake ex-post calculations of GHG emission mitigations. The project proponent shall describe all steps to be undertaken, resulting in quantification as the net difference between the baseline and the GHG emissions mitigations considering leakage. The project proponent shall provide ex-post calculation of GHG emission mitigations for each monitoring period.

The project proponent shall provide ex-ante projections for each monitoring period and for the total projections for the GHG emission mitigations for the crediting period.

The quantification shall convert all GHGs to tCO2-e.

All ex-ante estimates and ex-post calculations shall be converted to CO2-e using GWP values from the IPCC AR5 unless earlier GWP values can be justified.]

And related to measurements in section 4.10

> [*The impacts of project activities on identified GHG SSRs shall be monitored in order to determine the net GHG emission mitigations and for the purpose of issuing and/or activating already issued ICCs. The monitoring plan shall include parameters, GHG SSR identified and according to section 4.6 and/or be in line with the applied methodology and the requirements of ISO 14064-2.*
>
> *All data and information related to the monitoring of the GHG project shall be recorded and documented following procedures established according to section 4.10.*
>
> *If the project has other environmental and/or social benefits being verified, the monitoring plan shall also outline measurements or otherwise obtain, record, compile, and analyze data and information important for quantifying and reporting impacts on relevant environmental and/or social impacts.*
>
> *According to the monitoring plan, the project proponent shall provide monitoring results to the VVB. Project proponents shall use the monitoring report template for reporting. The monitoring report shall include schedules, roles and responsibilities, equipment, resources, and methodologies to obtain, estimate, measure, calculate, compile and record GHG data and other information for the project and GHG emissions mitigations.*
> *The frequency of monitoring and verification for projects that have been validated, registered and issued ex-ante instruments shall be annual. For AFOLU projects, the monitoring and verification frequency may be up to five years*.]

b) ICR has procedures to ensure that validation occurs prior to or in tandem with verification. This is ensured through ICRs requirement documents and ICRs process requirements.

In section 6 in ICRs requirement document, *Validation*, it is provided that:

> [*All projects are subject to Validation of projects*]

And in section 6.1:

> [*Validation involves determining the project methodology and a project's eligibility to generate GHG emission mitigation outcomes on an ex-ante basis. Validation shall be conducted according to ISO 14064-3 and ISO 14065. The validation report shall be made public.*]

And in section 7 where first verification of mitigation outcomes may coincide with validation.:

> [*Verification involves determining the project's GHG emissions mitigation outcomes. Verification shall be conducted according to ISO 14064-3 and ISO 14065. The evidence-gathering plan shall be sufficient so the VVB body can provide a reasonable level of assurance. The verification report shall be made public. The first verification can be conducted at the same time as validation.*]

For the process of the project cycle,

In section 2.4.1, *Project Design Description for Validation*, it is stated that:

> [*When projects have been early registered and/or when the project design description is completed, projects can undergo validation.*]

In section 2.4.2, *Validation of Projects*, in ICRs Process Requirements, it is provided that:

> [*The validation process shall be completed for projects to be eligible for registration and issuance*

ICCs. When project proponents issue ICCs after validation of projects, they are inactive and, as such, cannot be used (retired) for the purpose of offsetting for organizations holding them. ICCs can, however, be transferred when inactive. ICCs are activated subject to verification of GHG emission mitigation outcomes by the VVB.]

For the registration, please refer to section 2.4.3 (*Registration and Issuance Request*), and its relation to validation discussed in section 4.4.1 (*Project Design Description for Validation*) and 4.4.2 (*Validation of Projects*), in the ICR Process Requirements for a full description of the validation process steps and accompanying figures of the process steps.

A more general description of when validation shall be conducted can also be seen in the figures provided in section 2. *Project Cycle and the ICR,* in the ICR process requirements.

The process of validation and verification is also described in section 5 in ISO 14064-2, which projects are subject to validation and verification to according to ISO 14064-3.

c) ICR has procedures in place to ensure that the results of validation and verification are made publicly available.

Results of validation and verification are made publicly available in ICRs registry platform, under projects. The documentation, verification reports, and validation reports can be found for each individual project in the registry platform.

Descriptions of what information shall be publicly disclosed and what information will not be publicly disclosed can be found in section 2.4.5, *Issuance of ICCs*, in ICRs process requirements. Among other documents, the monitoring report, validation report, and verification report are listed as documents that shall be published.

d) ICR has procedures to ensure that monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at specified intervals throughout the duration of the crediting period.

Results of monitoring are made publicly available in ICRs registry, under projects. The documentation of monitoring reports can be found for each project in the registry platform.

Descriptions of what information shall be publicly disclosed and what information will not be publicly disclosed can be found in section 2.4.5, *Issuance of ICCs*, in the ICRs process requirements. The monitoring report is listed as a document that shall be published.

For monitoring, there are requirements regarding the monitoring plan and monitoring as stated in sections 4.6 and 4.10 in the ICR Requirement Document.

Section 4.6.

[Project proponents shall follow the applied methodology or establish and apply criteria and procedures for selecting GHG SSRs for monitoring. When establishing criteria and procedures, the project proponents should follow Annex A.3.2.1 in ISO 14064-2.]

Section 4.10

[*The impacts of project activities on identified GHG SSRs shall be monitored in order to determine the net GHG emission mitigations and for the purpose of issuing and/or activating already issued ICCs. The*

monitoring plan shall include parameters, GHG SSR identified and according to section 4.6 and/or be in line with the applied methodology and the requirements of ISO 14064-2.

All data and information related to the monitoring of the GHG project shall be recorded and documented following procedures established according to section 4.10.

If the project has other environmental and/or social benefits being verified, the monitoring plan shall also outline measurements or otherwise obtain, record, compile, and analyze data and information important for quantifying and reporting impacts on relevant environmental and/or social impacts.

According to the monitoring plan, the project proponent shall provide monitoring results to the VVB. Project proponents shall use the monitoring report template for reporting. The monitoring report shall include schedules, roles and responsibilities, equipment, resources, and methodologies to obtain, estimate, measure, calculate, compile and record GHG data and other information for the project and GHG emissions mitigations.

The frequency of monitoring and verification for projects that have been validated, registered and issued ex-ante instruments shall be annual. For AFOLU projects, the monitoring and verification frequency may be up to five years.]

Criteria regarding the length of the crediting period and the renewal of the project crediting period are set out in section 3.4, *Start Date and Crediting*, the ICR requirement document.

e) ICR has procedures to ensure that mitigation is measured and verified by an accredited and independent third-party verification entity.

Verification is the process of evaluating and independently determining if the outcome of the implementation of the project ex-post and its activities and conformity to the ICR requirements and ISO 14064-2 based on historical data and information. All projects are subject to verification of the implementation of projects and mitigation outcomes.

Mitigation outcome is measured and verified by an accredited and independent third-party verification entity to ensure the quality of validation/verification assessment conducted by VVBs, the criteria are set out in the ICR requirement document and ICR process requirements or other guidance documents and informed to the VVB by ICR.

ICR ensures that mitigation is measured and verified by an accredited and independent third-party verification entity by requiring VVBs to fill out ICRs KYC and VVB application form. VVB application form asks VVBs to provide general information about the organization and accreditation details. The applicant shall also attest that the information presented in the application is true, accurate, and complete. Further, upon approval of the application, the VVB must sign an agreement with ICR for conducting validation and verification for ICR registered projects that, i.e., stipulates permission to review VVB´s performance of their validation/verification practices.

The criteria for VVBs are outlined in section 8 in the ICR requirement document.

In section 7 the requirements for verification of mitigations are discussed. In particular, in section 7:

[*All projects are subject to verification of the implementation of projects and mitigation outcomes.*]

And further in section 7.1

[*Verification involves determining the project's GHG emissions mitigation outcomes. Verification shall be conducted according to ISO 14064-3 and ISO 14065. The evidence-gathering plan shall be sufficient so the*

VVB body can provide a reasonable level of assurance. The verification report shall be made public. The first verification can be conducted at the same time as validation.

If project impacts under verification assessment do not meet the verification criteria, the VVB shall produce an adverse verification opinion and provide the verification report to the project proponent. The project proponent shall inform the ICR of any adverse verification opinion and is ineligible for issuance or activation of ICCs until corrective action is taken and the validation/verification body has closed any non-conformities and provided a positive verification opinion.]

f) ICR has procedures to ensure that ex-post verification of mitigation is required in advance of issuance of emissions units.

Ex-post verification of mitigation is required in advance of issuance (activation) of emissions units is ensured through ICRs procedures. Only ex-post credits are eligible for retirement.

The issuance process is described in section 2.4 in the ICR process requirements generally and eligibility for ex-ante issuance in more detail in 2.4.2.

[*The validation process shall be completed for projects to be eligible for registration and issuance ICCs. When project proponents issue ICCs after validation of projects, they are inactive and, as such, cannot be used (retired) for the purpose of offsetting for organizations holding them. ICCs can, however, be transferred when inactive. ICCs are activated subject to verification of GHG emission mitigation outcomes by the VVB*.]

Please see section 3.4, *Start date and crediting*, in ICRs requirement document, on eligibility for ex-ante issuance:

[*ICCs may be issued when projects have been validated on an ex-ante basis (i.e., after validation of project and estimation on GHG emission mitigation outcomes) subject to demonstration of additionality level 4b. At issuance, such ICCs are in-active and cannot be used for offsetting purposes until they have been activated5. ICCs are activated on an ex-post basis (i.e. after verification that mitigations are real) and only for GHG emission mitigations within the monitoring period. Active ICCs can be retired and used for offsetting purposes.*]

For the avoidance of doubt, **active** ICCs mean ICCs that have been verified that impacts are real and can be used for offsetting emissions, while **inactive** ICCs mean ICCs that have been issued in the ICR registry from a registered project that an approved VVB has validated, but mitigations have not yet been verified. Inactive ICCs cannot be retired and therefore not used as offsets by default in the registry platform. See ICR definitions. Credits are issued ex-post in other instances where issuance and activation coincide.

The process of ex-ante issuance is discussed in section 2.4.3 in the ICR process requirements.

[*Partial issuance is applicable for projects where mitigations have not been verified. Partial issuance allows for the issuance of 50% of estimated GHG emission mitigation outcomes for the crediting period or monitoring period, notwithstanding ICCs demarcated for the adjustment account. If GHG emission mitigation outcomes have been verified for a monitoring period, full issuance is possible for the monitoring period.*]

When credits are issued ex-post they follow same process but in addition section 2.5 in the ICR process requirements is also followed.

[*ICCs are activated when impacts are real, and a VVB has verified GHG emission mitigation outcomes*.]

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In late 2023 ICR revised the ICR requirement document and ICR definitions also in early 2024 ICR process requirements were revised. Section references have changed.

a. N/A
b. Now section 6 discusses validation and verification in ICR requirement document, 6.1 validation and 6.2 verification. ICR process requirement structure has changed. Now section 3 addresses the project cycle and section 3.3 of pre-registration of project (earlier referred to as "early registration". In section 3.4. validation is addressed. For issuance of instruments ex-ante section 4.2 addresses requirements for issuance. In addition to validation, VVBs shall follow and adhere to ICR validation and verification specifications in addition to ISO 14064-3 when conducting validation.

   See:
   ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 6
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 3.3
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 3.4
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.2
   ICR validation and verification specifications v1.0 - ICR Program (carbonregistry.com)

c. Information about what information is publicly available is addressed now in section 3.5, 3.7 and in section 4.3 in ICR process requirements.

   See:
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 3.5
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 3.7
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.0

d. N/A

e. Now the approval process of VVBs is provided in the ICR documentation page where they can submit their application for approval, see also section 8 in ICR requirement document. Further, ICR has improved its KYC/KYB procedures (available in ICRs QMS) and now ICR is supported by Taktikal a 3rd party service for digital KYC/KYB. Criteria for VVBs have been moved and are now disclosed in section 7 of the ICR requirement document. Like for validation, verification shall follow ICR validation and verification

specifications in addition to ISO 14064-3.

See:
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 8
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 7
ICR validation and verification specifications v1.0 - ICR Program (carbonregistry.com)

f. Now the issuance process is detailed further in section 4 of the ICR process requirements. There clear distinction between ex-ante and ex-post issuances are provided. Ex-ante issuances are addressed in section 4.2 and ex-post in section 4.3. In addition to earlier requirements for ex-ante discount on ex-ante issuances ICR now allows issuances of the full, validated GHG emission mitigation if the proponent has insurance or warranty coverage.

[*ICCs may be issued when projects have been validated on an ex-ante basis (i.e., after validation of project and estimation on GHG emission mitigation outcomes) subject to demonstration of additionality level 4b or insurance cover by a licensed insurance company. The insurance cover shall be in kind or in cash. Ex-ante ICCs cannot be used for offsetting purposes until the GHG emission mitigations have been verified, i.e. there is no option for retiring ex-ante ICCs. Ex-post ICCs are ICCs that represent verified GHG emission mitigations and only for GHG emission mitigations within the monitoring period. Ex-post ICCs can be retired and used for offsetting or for other environmental claims supported by retirement.*]

See:
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 3.4

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR has provisions in place, through requiring accreditation according to ISO 14065 for VVBs, to:

- manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures and ICR and the activities supported by ICR.

- requiring accredited third-party(ies) to disclose whether they or any of their family members are dealing in, promoting, or otherwise have fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated.
- address and isolate them if such conflicts should arise.

Such provisions are ensured through section 5.3 of ISO 14065, where requirements for management of impartiality are described. Therefore, based on a VVBs status of accreditation, ICR assumes that VVBs have in place necessary processes for the management of impartiality.

2023 - application

ICR has provisions in place, through requiring accreditation according to ISO 14065 for VVBs, to:

- manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures and ICR and the activities supported by ICR.
- requiring accredited third-party(ies) to disclose whether they or any of their family members are dealing in, promoting, or otherwise have fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated.
- address and isolate them if such conflicts should arise.

Such provisions are ensured through section 5.3 of ISO 14065, where requirements for management of impartiality are described. Therefore, based on a VVBs status of accreditation, ICR relies on that VVBs have in place necessary processes for the management of impartiality.

ICR signs agreements with all approved VVBs where their obligations are outlined. In addition ICR stipulates that:

[*ICR may, at its sole discretion (and, for the avoidance of doubt, either itself or through any agent ICR may appoint from time to time), conduct individual or periodic reviews of the VVB's performance of the Service to seek evidence as to whether the VVB has complied and is in compliance with its obligation under Clause 2.1. Such reviews may include, but are not limited to, desk reviews of the VVB's work, visits to the VVB's offices, witnessing the VVB undertaking the Services, and visits to Projects on-site or off-site through teleconferencing equipment.*]

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In addition to the information provided in the last submission, the core principles embedded within the ISO 17029/14065 accreditation standards. These principles are foundational to ensuring the integrity, transparency, and reliability of the accreditation process. By adhering to these standards, organizations commit to upholding high levels of impartiality, competence, and consistency in their operations. The ISO 17029/14065 framework emphasizes the importance of a systematic approach to quality management, ensuring that all activities are conducted with a commitment to excellence and continuous improvement. Engaging with these principles not only enhances the credibility of the accreditation but also reinforces the trust stakeholders place in their capabilities to deliver services that meet or exceed the established international benchmarks.

Principles of standards establish the overall mission of the standard. From ISO 17029 in section 4.

[4.1 General

4.1.1 The principles described in this clause provide the basis for the requirements specified in this document. These principles should be applied as guidance for decisions that sometimes need to be made for unanticipated situations. Principles are not requirements.

4.1.2 The overall aim of validation/verification is to give confidence to all parties that a validated/ verified claim fulfils the specified requirements. The value of validation/verification is the confidence that is established by an impartial evaluation by a competent validation/verification body.

4.1.3 Parties that have an interest in validation/verification include, but are not limited to:

a) clients of the validation/verification bodies;
b) programme owners;
c) users of the validated/verified claims;
d) regulatory authorities.

4.2 Principles for the validation/verification process

4.2.1 Evidence-based approach to decision making
The process deploys a method for reaching reliable and reproducible validation/verification conclusions and is based on sufficient and appropriate objective evidence. The validation/verification statement is based on evidence collected through an objective validation/verification of the claim.

4.2.2 Documentation
The validation/verification process is documented and establishes the basis for the conclusion and decision regarding conformity of the claim with the specified requirements.

4.2.3 Fair presentation
Validation/verification activities, findings, conclusions and statements, including significant obstacles encountered during the process, as well as unresolved, diverging views between the validation/ verification body and the client are truthfully and accurately reflected.

4.3 Principles for validation/verification bodies

4.3.1 Impartiality
Decisions are based on objective evidence obtained through the validation/verification process and are not influenced by other interests or parties. Threats to impartiality can include but are not limited to the following.

a) Self-interest: threats that arise from a person or body acting in their own interest. A concern related to validation/verification, as a threat to impartiality, is financial self-interest.
b) Self-review: threats that arise from a person or body reviewing the work done by themselves.

c) Familiarity (or trust) : threats that arise from a person or body being too familiar with or trusting of another person instead of seeking evidence for validation/verification body, and not the validation/verification body, has the responsibility for the claim and its conformity with the applicable specified requirements. The validation/verification body has the responsibility to base a validation/verification statement upon sufficient and appropriate objective evidence.]

And from ISO 14065

[4.4 Conservativeness
When the body assesses comparable alternatives, preference is given to the alternative that is cautiously moderate.

4.5 Professional scepticism
Attitude based on recognition of the potential circumstances able to cause material misstatements in an environmental information statement.

NOTE ISO 14066:2011, Annex A, provides guidance on evidence and the application of professional scepticism. This annex applies equally to the validation and verification of all environmental information.]

The ICR requirements document reflects the principles as delineated in section 2, closely aligning with the rigorous standards of ISO 14065. ABs conduct periodic audits of VVBs to ensure adherence to their established procedures and the fundamental principles of ISO 14065, such as impartiality, competence, and consistency.

All VVBs collaborating with ICR maintain their accreditation status with their respective ABs, underscoring their ongoing compliance with the high standards set forth by international accreditation guidelines. This continued accreditation is a testament to the VVBs' commitment to quality and integrity in their operations.

All accredited VVBs are required to have an impartiality policy and procedures in place to manage impartiality in accordance with the standards set by ISO 17029 and ISO 14065. These standards provide detailed requirements for the management of impartiality. A third-party Accreditation Body evaluates both the procedures and their implementation during ongoing accreditation audits to ensure compliance.

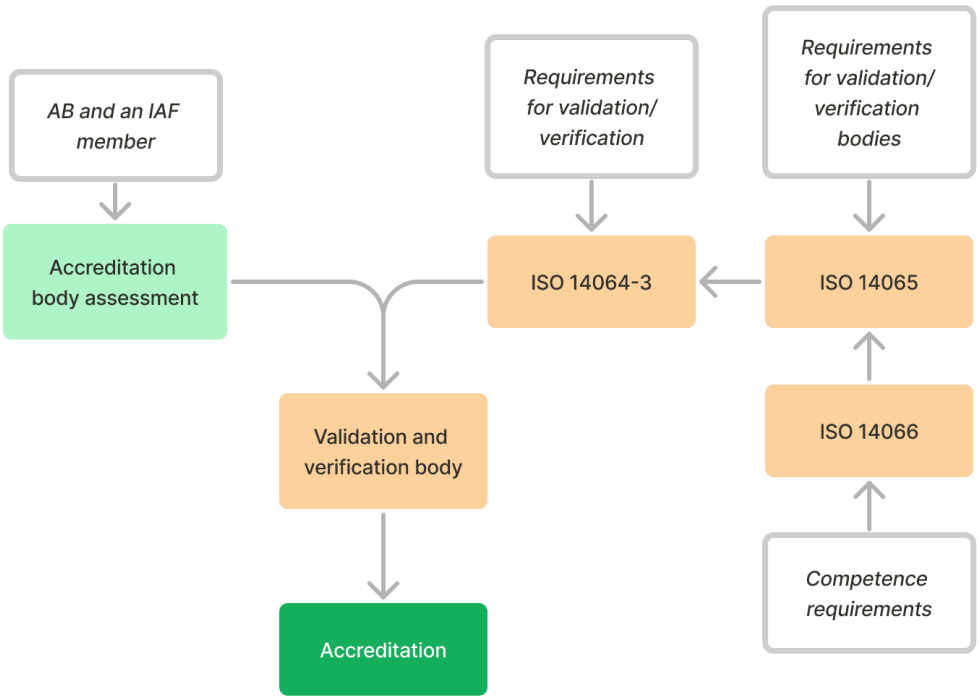


Figure 5: Accreditation flow

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR has procedures requiring that a renewal of any activity at the end of its crediting period, including a re-evaluation of its baselines, and procedures and assumptions of quantifying, monitoring, and verifying mitigation, including the baseline scenario.

ICR requires a new assessment and validation of the PDD before any renewal can be granted.

Such procedures are provided in ICRs Process Requirements
Section 4.4.3, Registration and Issuance Request, states that:

> [*If the Project crediting period has been renewed, a revised Project design description and new validation report and validation agreement shall be provided to ICR*]

These re-evaluated documents will be publicly disclosed under the project in the registry.

Section 5, Assessment of Conformity, states that:

> [*…project crediting period renewal request process may be subject to an assessment of conformity by ICR… ICR may, at its discretion, undertake an assessment of…. project crediting period renewal request, to safeguard fulfilment of the principles and Requirements of ICR*]

b) The ICR does not set out requirements towards the allowable number of years between verification events of registered projects. Market conditions can limit the incentive of projects doing verification which can be costly. Many factors can play a role, but excluding monitoring periods for verification of mitigation, outcomes can disincentivize participation in the VCM and therefore halt the scaling of climate actions.

2023 - application

a) ICR has procedures requiring that a renewal of any activity at the end of its crediting period, including a re-evaluation of its baselines, and procedures and assumptions of quantifying, monitoring, and verifying mitigation, including the baseline scenario.

ICR requires a new assessment and validation of the PDD before any renewal can be granted.

Such procedures are provided in ICRs process requirements.
Section 3.4.2, *Registration and Issuance Request*, states that:

> [*Project proponents may apply at the end of the current crediting period for a renewal of the crediting period, subject to conformity to all future requirements, update of the PDD, re-evaluating baseline scenarios using tools and methodologies in effect at the time of renewal, and validation by an approved VVB.*]

These re-evaluated documents will be publicly disclosed under the project in the registry.

b) For projects that have issued ex-ante credits is specifically stipulated in section 4.10.

[The frequency of monitoring and verification for projects that have been validated, registered and issued ex-ante instruments shall be annual. For AFOLU projects, the monitoring and verification frequency may be up to five years.]

The ICR does however, not set out requirements towards the allowable number of years between verification events of registered projects. Market conditions can limit the incentive of projects doing verification which can be costly. Many factors can play a role, but excluding monitoring periods for verification of mitigation, outcomes can disincentivize participation in the VCM and therefore halt the scaling of climate actions.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

a. N/A
b. In late 2023, the ICR updated its requirement document, with stipulations for monitoring and verification in Section 4.10.:

   [*The frequency of monitoring and verification for projects that have been validated, registered and issued ex-ante instruments shall be annual. For AFOLU projects, the monitoring and verification frequency may be up to five years*.]

   Further, the ICR process requirements also recently updated stipulations in section 10.2

   [*When a project has not submitted a monitoring and verification report for 12 months based on stipulations in the monitoring and verification plan, the project is identified as inactive.*]

   See:
   ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.10
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 10.2

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Credits issued ex-ante have a status of being inactive and cannot be used as offsets both by definition and functionality in the registry platform. ICCs become active on an ex-post basis. Credits, which can only be activated for mitigations that occur within the specified project crediting period, can be granted activation after verification that the mitigation outcome has occurred. For the avoidance of doubt ICCs with the status "inactive" are excluded

from falling under the scope of the application as they may be ex-ante and by default cannot be retired and used as offsets.

2023 - application

Not all projects are eligible for ex-ante issuance, they need to meet certain additionality threshold. Howere, credits issued ex-ante have a status of being inactive and cannot be used as offsets both by definition and functionality in the registry platform and on-chain. Credits, which can only be activated for mitigations that occur within the specified project crediting period, can be granted activation after verification that the mitigation outcome has occurred. ICCs become active on an ex-post basis by automatic exchange of ex-ante credits with ex-post credits from accounts where the ex-ante (inactive) credits are deposited into a cancellation account held by ICR and on a public ledger. For the avoidance of doubt ex-ante ICCs with the status "inactive" are excluded from falling under the scope of the application as they may be ex-ante and by default cannot be retired and used as offsets.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.

https://documentation.carbonregistry.com/documentation/

The ICR process requirements were updated in early 2024 to provide comprehensive procedures for the issuance of International Carbon Credits (ICCs), both ex-ante and ex-post. Section 4 addresses on these issuances and clarifies the distinctions between ex-ante and ex-post ICCs. Additionally, the definitions for ex-ante and ex-post credits have been specified in the ICR. The ICR user guide also offers guidelines on transactions involving both ex-post and ex-ante credits. It is important to note that the smart contract governing the ex-ante credits lacks a retirement function, as ex-ante ICCs don't represent real GHG emission mitigations. This distinctive feature ensures that ex-ante credits cannot be retired, thereby enhancing their security and preventing the possibility of premature retirement claims.

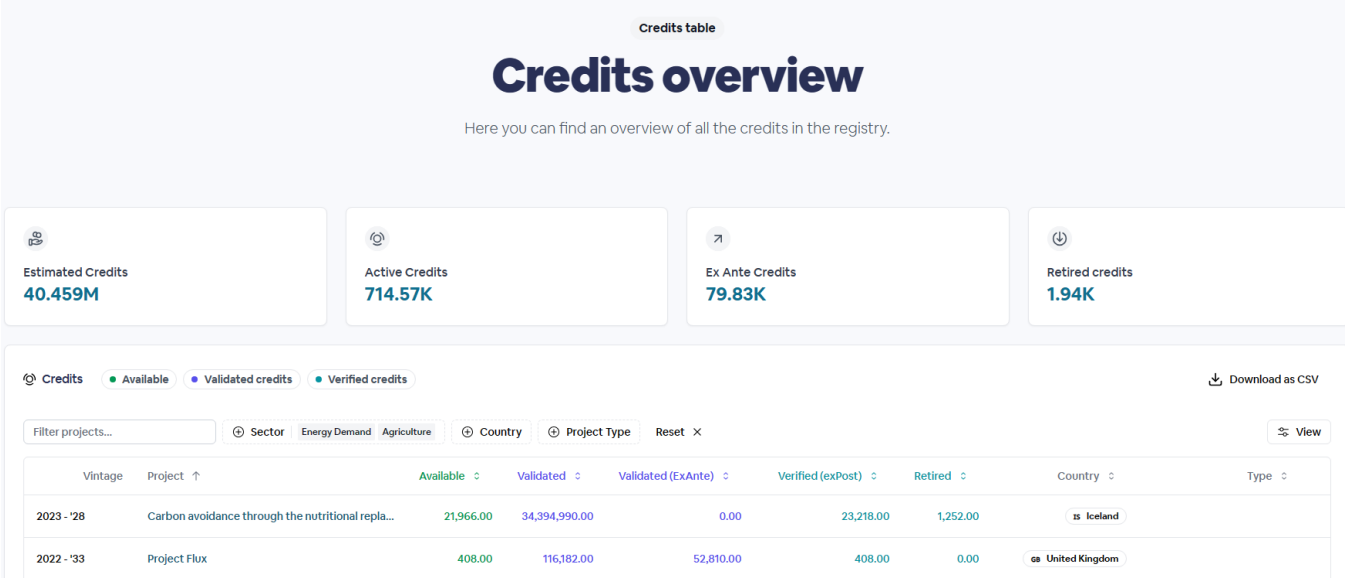


Figure 6: an Overview of ex-ante and ex-post credits from the credits section of the registry.

See:
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4
https://documentation.carbonregistry.com/documentation/icr-program/definitions - ICR Definitions
Registry user guide - ICR Program (carbonregistry.com)
Contracts - ICR Program (carbonregistry.com)
Carbonregistry.com

Question 4.4 Have a clear and transparent chain of custody

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

Question 4.5 Represent permanent emissions reductions

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

According to ICRs requirements concerning the risk of non-permanence (section 5.14 in the ICR Requirement Document), project proponents implementing AFOLU projects and carbon dioxide removal (CDR) shall deposit non-tradable buffer credits to cover unforeseen losses in carbon stocks. ICR relies on already established practices, and the number of credits to be deposited in the AFOLU pooled buffer account is determined by the approved

methodology. If not explicitly addressed in the applied methodology, the deposit to the AFOLU buffer account shall be 20% of issued credits from that crediting period, and for the CDR buffer account shall be 5% of issued ICCs for the respective crediting period. If requested, project proponents can apply for reimbursement of AFOLU ICCs, based on risk assessment and mitigation outcomes from monitoring and risk management.

2023 - application

Reversals and associated risk are discussed in section 4.8.2 in the ICR requirement document.

[Project proponent implementing AFOLU projects and CDR subject to a risk of reversal shall deposit non-tradable buffer credits to cover unforeseen losses in carbon stocks.
A proportion of expected GHG emission mitigations shall be transferred to an adjustment account to protect projects from unexpected reductions in carbon stocks or increases in emissions. The project proponent shall establish and apply criteria, procedures, and/or methodologies to assess the risk of a reversal of GHG emission mitigations. A reversal risk assessment shall address the risk of non-permanence, including both general and project-specific risk factors. General risk factors include financial, technical, management, rising land opportunity costs, regulatory and social instability, and natural disturbances. Project-specific risk factors may vary by project type. Project proponents may use a relevant current good practice guidance risk assessment tool or rely on ISO 31000 to assess the non-permanence risk.

The number of credits to be deposited to the AFOLU and CDR pooled buffer adjustment account is determined by the risk assessment.

Irrespective of the risk assessment, the project proponents shall never deposit less than 10% of issued ICCs in the AFOLU buffer adjustment account and 1% in the CDR (non-AFOLU) buffer adjustment Account.]

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In late 2023, ICR updated the ICR requirement document, specifically adding stipulations in Section 4.8.2 regarding the concept of non-permanence.

[*The project proponent shall define the permanence of the GHG emission mitigations. However, the minimum term of permanence shall be 50 years after the end of the last crediting period.*]

In addition, [*Where an event occurs that is likely to result in a reversal event, the project proponent shall notify ICR within 30 days of discovering the likely event. Where instruments have previously been issued, the proponent shall prepare a reversal event report including a conservative estimate of the reversal of previously verified GHG emission mitigations due to losses in carbon stocks from the project, based on monitoring of the area affected by the event, and submit to ICR.*

At the next verification subsequent to the loss event, the monitoring report shall restate the loss from the loss event and calculate net GHG emission mitigations for the monitoring period in accordance with the quantification procedures provided in the PDD.]

In ICR process requirements updated in early 2024, ICR provides procedures for buffer deposits and reporting on reversal events and can be view in section 4.4

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.8.2
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.4
Reversal event report - ICR Program (carbonregistry.com)

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

As defined, the ICR program addresses reversal irrespective of the quantity of lost ICCs. A reversal event, as well as an underperformance event, can initiate reversal mitigation. ICR addresses the risk associated with projects activities' non-permanence and non-performance of estimated mitigation outcomes by requiring projects proponent to set aside non-tradable adjustment ICC credits. This is completed in order to cover unforeseen losses in carbon stocks and unforeseen obstacles in the operations of projects. The adjustment credits from all projects are held in a single pooled adjustment account administered by ICR. Adjustment ICCs can be drawn upon in the event of a reversal in carbon stocks or if projects fail to produce real mitigation outcomes in any individual project where ICCs have been retired or have been transferred in an inactive state. For reversal events when the project proponent cannot compensate, ICR cancels ICCs from the adjustment account on a first in, first out basis.

2023 - application

As defined, the ICR program addresses reversal irrespective of the quantity of lost ICCs. A reversal event, as well as an underperformance event, can initiate mitigation. ICR addresses the risk associated with projects activities' non-permanence and non-performance of estimated mitigation outcomes by requiring projects proponent to set aside non-tradable adjustment ICC credits. This is completed in order to cover unforeseen losses in carbon stocks and unforeseen obstacles in the operations of projects. The adjustment credits from all projects are held in a single pooled adjustment account administered by ICR. Adjustment ICCs can be drawn upon in the event of a reversal in carbon stocks or if projects fail to produce real mitigation outcomes in any individual project where ICCs have been retired or have been transferred in an inactive state. For reversal events when the project proponent cannot compensate, ICR cancels ICCs from the adjustment account on a first in, first out basis.
Further in section 3.5 in the ICR requirement document.

[*The risk of non-permanence and performance of projects registered with ICR is addressed with an adjustment account held and operated by ICR. When projects issue ICCs ex-ante, they shall deposit 2% of issued ICCs to the adjustment account irrespective of sector and project type. For reversal events and/or non-performance, when the*

project proponent cannot compensate for the reversal or performance, ICR cancels ICCs from the adjustment account on a first-in, first-out basis.]

Project proponents are also required by signing Terms and conditions for organization to compensate for any over issuance of credits. See section 8.5 in the ICR Terms and conditions.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Now all documentation relating to the ICR program is available on ICR documentation page.
https://documentation.carbonregistry.com/documentation/

Building on the previous submission, ICR updated the requirement document in late 2023 to include stipulations regarding non-permanence in section 4.8.2. In ICR process requirements updated in early 2024, ICR provides procedures for buffer deposits and reporting on reversal events in section 4.4.1

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.8.2
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.4.1
Reversal event report - ICR Program (carbonregistry.com)

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR has procedures and measures to require and support activities to undertake a risk assessment that accounts for, inter alia, any potential cause, relative scale, and the likelihood of reversals.

Section 5.14 in ICRs Requirement Document, states that:

[*The project proponent shall establish and apply criteria, procedures, and/or methodologies to assess the risk of a reversal of GHG Emission Mitigations. A reversal risk assessment must address the risk of non-permanence that addresses both general and project-specific risk factors. General risk factors include financial failure, technical failure, management failure, rising land opportunity costs, regulatory and social instability, and natural disturbances. Project-specific risk factors may vary by project type. Project proponents may use an approved risk assessment tool or using ISO 31000 to assess the non-permanence risk*]

All projects are subject to an adjustment account with an appropriate number of ICCs, irrespective of permanence risk. ICRs define an adjustment account as the following. This definition can be found in section 3, *Definitions*, in ICRs Requirement Document.

[*Adjustment Account means an account on the ICR Registry in which Project proponents deposit part of issued ICCs to meet possible reversal events and/or non-permanence of impacts according to the ICR Requirement Document the ICR Process Requirements and any other applicable requirements*]

Further, AFOLU and CDR projects shall deposit non-tradable buffer credits to cover unforeseen losses in carbon stocks.

[*The number of credits to be deposited in the AFOLU pooled buffer account is determined by the approved methodology. If not explicitly addressed in the applied methodology, the deposit to the AFOLU Buffer Account shall be 20%, and for the CDR Buffer Account shall be 5% of issued ICCs*.]

[*Based on risk assessment and mitigation outcomes from monitoring and risk management, the Project proponent can apply reimbursement of AFOLU ICCs. However, project proponents shall never hold less than 10% of issued and active ICCs in the AFOLU Buffer Adjustment Account and 1% on the CDR Buffer Adjustment Account*.]

b) ICR has procedures and measures to require and support activities to monitor the identified risk of reversals.

In accordance with section 7.2 in the ICR Requirement Document, the states that project proponents shall monitor the project activity.

[*The project proponent shall monitor the Project Activity and its GHG Emission Mitigations in accordance with the Monitoring Plan. The impacts of project activities on relevant emission SSRs shall be monitored in order to determine net GHG Emission Mitigation*.]

Further, section 6.7 in ISO 14064-2 it is stated that the project proponent shall establish and apply criteria, procedures and/or methodologies to assess the risk of a reversal of a GHG emission reduction or removal enhancement (i.e. permanence of GHG emission reduction or removal enhancement).

Proposed revision: Clarification on monitoring of risk of reversals.
For clarification purposes, ICR will revisit section 7.2 in the ICR Requirement Document before the end of Q2 2022, subject to consultation with the PAMAP and final approval of the ICR Board.

c) ICR has procedures and measures in place to require and support activities to mitigate identified risks of reversals.

ICR addresses the risk of non-permanence and non-performance associated with project activities by requiring proponents to set aside non-tradable ICCs on an adjustment account.

Section 6, *Buffer and Adjustment Accounts*, in ICRs Process Requirements, states:

> [*The adjustment credits from all projects are held in a single pooled adjustment account administered by ICR…ICCs can be drawn upon in the event of a reversal in carbon stocks or if projects fail to produce real mitigation outcomes from any individual project where ICCs have been retired or have been transferred in an inactive state. Deposits to adjustment accounts are executed when project proponents issued ICCs*]

Section 6.2, *Buffer Adjustment Account Applicability*, in ICRs Process Requirements states:

> [*The benchmark for AFOLU non-permanence risk is 20% which means by default, the risk of reversal of AFOLU projects is determined to be 20%, and for Carbon Dioxide Removal (CDR) projects 10%.]*
>
> [*Project proponents can apply approved risk assessment tools to demonstrate that the risk is less than 20% for AFOLU projects and less than 10% for CDR projects. The risk assessment will determine the percentage of issued ICCs that must be deposited to the buffer adjustment account. Irrespective of output from the risk assessment, deposits for AFOLU projects to the adjustment account shall never be less than 10% of issued ICCs and 1% for CDR projects*]

Section 6.1, *Adjustment Account Applicability*, in ICRs Process Requirements, states that it is required that project proponents shall adhere to the following process steps when depositing adjustment credits into the adjustment account.

> [*1. The number of credits to be deposited in the Adjustment account is 1% of each issuance of ICCs irrespective of the timing of Issuance prior to Verification.*
> *2. Adjustment credits are Issued a serial number and are essentially considered ICCs. Adjustment credits are not subject to any Issuance fees.*
> *3. At the end of each crediting period for projects, the project proponent can apply for reimbursement of deposits of adjustment credits. They are reimbursed by ICR's sole discretion and with respect to the status of the adjustment account and cancellations made by the ICR due to nor-permanence and/or non-performance*]

d) ICR has procedures and measures to require and support activities to ensure a full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA.

Section 6, *Buffer and Adjustment Accounts*, in ICRs Process Requirements, states:

> [*The adjustment credits from all projects are held in a single pooled adjustment account administered by ICR…ICCs can be drawn upon in the event of a reversal in carbon stocks or if projects fail to produce real mitigation outcomes from any individual project where ICCs have been retired or have been transferred in an inactive state*]

Section 6.2, *Buffer Adjustment Account Applicability*, in ICRs Process Requirements states:

> [*The benchmark for AFOLU non-permanence risk is 20% which means by default, the risk of reversal of AFOLU projects is determined to be 20%, and for Carbon Dioxide Removal (CDR) projects 10%*]
>
> [*Project proponents can apply approved risk assessment tools to demonstrate that the risk is less than 20% for AFOLU projects and less than 10% for CDR projects. The risk assessment will determine the percentage of issued ICCs that must be deposited to the buffer adjustment account. Irrespective of output from the risk*

assessment, deposits for AFOLU projects to the adjustment account shall never be less than 10% of issued ICCs and 1% for CDR projects]

Proposed revisions: Procedures for loss events and carbon stock reversals.
ICR has scheduled a revision on the process of reporting reversal events and provide further details on the compensation of the reversals. The revision is anticipated to be completed before the end of Q2 2022, subject to consultation with the PAMAP and final approval of the ICR Board.

2023 - application

a) ICR has procedures and measures to require and support activities to undertake a risk assessment that accounts for, inter alia, any potential cause, relative scale, and the likelihood of reversals.

Section 6.7 in ISO 14064-2 addresses risk assessment of reversals

[*The project proponent shall establish and apply criteria, procedures and/or methodologies to assess the risk of a reversal of a GHG emission reduction or removal enhancement (i.e. permanence of GHG emission reduction or removal enhancement).*]

In section 4.8.2 in ICRs requirement document, states that:

[*The project proponent shall establish and apply criteria, procedures, and/or methodologies to assess the risk of a reversal of GHG emission mitigations. A reversal risk assessment shall address the risk of non-permanence, including both general and project-specific risk factors. General risk factors include financial, technical, management, rising land opportunity costs, regulatory and social instability, and natural disturbances. Project-specific risk factors may vary by project type. Project proponents may use a relevant current good practice guidance risk assessment tool or rely on ISO 31000 to assess the non-permanence risk.*]

Projects are also subject to deposits to an adjustment account with an appropriate number of ICCs, irrespective of permanence risk.

[*Adjustment account or Buffer adjustment account means an account on the ICR registry in which project proponents deposit part of issued ICCs to meet possible non-performance, reversal events and/or non-permanence of impacts according to the ICR requirement document the ICR process requirements and any other applicable requirements*]

Further, AFOLU and CDR projects shall deposit non-tradable buffer credits to cover unforeseen losses in carbon stocks.

[*The number of credits to be deposited to the AFOLU and CDR pooled buffer adjustment account is determined by the risk assessment.*

Irrespective of the risk assessment, the project proponents shall never deposit less than 10% of issued ICCs in the AFOLU buffer adjustment account and 1% in the CDR (non-AFOLU) buffer adjustment Account]

b) ICR has procedures and measures to require and support activities to monitor the identified risk of reversals.

In accordance with section 6.10 in ISO 14064-2 and 4.10 in the ICR Requirement Document, the states that project proponents shall monitor the project activity.

[*The impacts of project activities on identified GHG SSRs shall be monitored in order to determine the net GHG emission mitigations and for the purpose of issuing and/or activating already issued ICCs. The monitoring plan shall include parameters, GHG SSR identified and according to section 4.6 and/or be in line with the applied methodology and the requirements of ISO 14064-2.*]

Further, section 6.7 in ISO 14064-2 it is stated that the project proponent shall establish and apply criteria, procedures and/or methodologies to assess the risk of a reversal of a GHG emission reduction or removal enhancement (i.e. permanence of GHG emission reduction or removal enhancement).

c) ICR has procedures and measures in place to require and support activities to mitigate identified risks of reversals.

ICR addresses the risk of non-permanence and non-performance associated with project activities by conducting risk assessment and implement mitigation actions to address risks and by requiring proponents to set aside non-tradable ICCs on an adjustment account.

4. Buffer and Adjustment Accounts, in ICRs process requirements, states:

[*ICR addresses the risk associated with project activities' non-permanence and non-performance of estimated GHG emission mitigation outcomes by requiring the project proponent to set aside non-tradable adjustment ICC credits. This is completed in order to cover unforeseen losses in carbon stocks and unforeseen obstacles in the operations of projects. The adjustment credits from all CDR projects are held in a single pooled adjustment account administered by ICR. Adjustment ICCs can be drawn upon in the event of a reversal in carbon stocks or if projects fail to produce real GHG emission mitigation outcomes in any individual project where ICCs have been retired or have been transferred in an inactive state. Deposits to adjustment accounts are completed during the issuance of ICCs.*]

Section 4.2, *Buffer Adjustment Account Applicability*, in ICRs process requirements states:

[*ICCs within the pooled buffer adjustment account from different projects are functionally distinct, although administered in one pooled account in the ICR registry. Therefore, ICCs from the same project types will compensate for reversal events for the same project type. ICR will retire ICCs from the buffer adjustment account to compensate for reversals on a first-in, first-out rule after identifying which ICCs meet the aforementioned criteria for reversal compensation.*]

Section 4.1, *Adjustment Account Applicability*, in ICRs process requirements, states that it is required that project proponents shall adhere to the following process steps when depositing adjustment credits into the adjustment account.

[*Project proponents shall deposit adjustment credits into the adjustment account following this process.*
1. The number of credits to be deposited in the adjustment account is 2% of each issuance of ICCs, irrespective of the timing of issuance prior to Verification.
2. Adjustment credits are issued a serial number and are essentially considered ICCs. Adjustment credits are not subject to any issuance fees.
3. At the end of each project crediting period, the project proponent can apply for reimbursement of deposits of adjustment credits. They are reimbursed by ICR's sole discretion and with respect to the status of the adjustment account and cancellations made by the ICR due to non-permanence and/or non-performance.]

d) ICR has procedures and measures to require and support activities to ensure a full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA.

Hence the above in a)-c) ICR can ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In addition to the last submission, in late 2023, ICR revised the ICR requirement document, now stipulating non-permanence in section 4.8.2.

In ICR process requirements updated in early 2024, ICR provides procedures for buffer deposits and reporting on reversal events. Now, information about buffer adjustment is in section 4.4 in the ICR process requirements and how reversals are compensated.

ICR manages a buffer account publicly on ICR registry. When ICR will be eligible for CORSIA, ICR will create a buffer account for any buffer credits that are eligible under CORSIA.

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.8.2
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.4
Reversal event report - ICR Program (carbonregistry.com)
Carbonregistry.com

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 the programme within a specified number of days?	☒ YES
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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) ICR has provisions in place that confer liability on the project proponent to monitor, mitigate, and respond to reversals in a manner mandated in ICRs procedures.

Section 7.2 in the ICR Requirement Document states that project proponents shall monitor the project activity.

> [*The project proponent shall monitor the Project Activity and its GHG Emission Mitigations in accordance with the Monitoring Plan. The impacts of project activities on relevant emission SSRs shall be monitored in order to determine net GHG Emission Mitigation*.]

Further, section 6.7 in ISO 14064-2 states that the project proponent shall establish and apply criteria, procedures and/or methodologies to assess the risk of a reversal of a GHG emission reduction or removal enhancement (i.e., permanence of GHG emission reduction or removal enhancement).

Monitoring of project activities is done by the project proponent reported in a monitoring report and verification performed by a VVB assessing the monitoring results. For mitigations and response to reversals, the buffer adjustment account deposits shall be used for compensation as defined in the ICR Requirement Document.

> [*Adjustment Account or Buffer Adjustment Account means an account on the ICR Registry in which Project proponents deposit part of issued ICCs to meet possible reversal events and/or non-permanence of impacts according to the ICR Requirement Document the ICR Process Requirements and any other applicable requirements.]*

b) ICR has provisions in place that require activity proponents, upon being made aware of a material reversal event, to notify ICR about such events.

In accordance with ICRs Requirement Document under section 7, *Project implementation*, the project proponent is required to indicate and report (ICR does not require such notification within a specific number of days) from the monitoring plan, where impacts of the implemented projects shall be reported regularly and according to the monitoring plan and methodology applied. Reported data are subject to verification conducted by a VVB, ensuring the integrity of mitigation outcomes.

In section 5 in the ICR Process Requirements, projects are subject to an assessment of conformity. This can be initiated in case of a reversal event. During the assessment, ICR may determine that ICCs have been issued in excess of the correct amount hence the reversal event.

c) ICR has provisions in place that confer responsibility to ICR to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in ICRs procedures?

ICR has full authorization to administer the buffer and adjustment accounts with its deposited ICCs. Section 6, *Buffer and Adjustment Accounts*, in ICRs Process Requirements, states:

> [*The adjustment credits from all projects are held in a single pooled adjustment account administered by ICR…ICCs can be drawn upon in the event of a reversal in carbon stocks or if projects fail to produce real mitigation outcomes from any individual project where ICCs have been retired or have been transferred in an inactive state*]

In this way, ICR can ensure and confirm that any reversals are fully compensated if such events occur.

Proposed revision: Procedures for loss events and carbon stock reversals.
ICR has scheduled a revision on the process of reporting reversal events and provide further details on the compensation of the reversals and reporting thereof. The revision is anticipated to be completed before the end of Q2 2022, subject to consultation with the PAMAP and final approval of the ICR Board.

2023 - application

a) and b) ICR has provisions in place that require activity proponents, upon being made aware of a material reversal event, to notify ICR about such events and upon being made aware of a material reversal event, to notify the programme within a specified number of days.

In accordance with ICRs requirement document under section 4.10, *Monitoring*, the project proponent is required to indicate and report (ICR does not require such notification within a specific number of days) from the monitoring plan, where impacts of the implemented projects shall be reported regularly and according to the monitoring plan and methodology applied. Reported data are subject to verification conducted by a VVB, ensuring the integrity of mitigation outcomes.

[*The impacts of project activities on identified GHG SSRs shall be monitored in order to determine the net GHG emission mitigations and for the purpose of issuing and/or activating already issued ICCs. The monitoring plan shall include parameters, GHG SSR identified and according to section 4.6 and/or be in line with the applied methodology and the requirements of ISO 14064-2*.]

[*According to the monitoring plan, the project proponent shall provide monitoring results to the VVB. Project proponents shall use the monitoring report template for reporting. The monitoring report shall include schedules, roles and responsibilities, equipment, resources, and methodologies to obtain, estimate, measure, calculate, compile and record GHG data and other information for the project and GHG emissions mitigations.*]

In section 5 in the ICR process requirements, projects are subject to update ICR regularly on deviations and change. This can be initiated in case of a reversal event. During the assessment, ICR may determine that ICCs have been issued in excess of the correct amount hence the reversal event.

[*Any changes to the validated project design description shall be documented as soon as they occur. An updated project design description shall be uploaded to the registry, along with an updated validation report as applicable.*

1. Project proponents shall respectfully submit monitoring and verification reports per the monitoring plan and verification plan. If the project proponent fails to submit a monitoring and/or verification report to the registry within six months of the monitoring plan and verification plan, the following applies:

- *ICR requests evidence from the project proponent showing that the project is still active.*
- *The project proponent shall submit objective evidence within 60 days of receiving the request.*

2. If the project proponent fails to confirm continuing implementation/operation, ICR may act against the project proponent, including applying sanctions regarding its registry account activities until continuing implementation/operation has been confirmed.]

b) ICR has provisions in place that confer responsibility to ICR to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in ICRs procedures?

ICR has full authorization to administer the buffer and adjustment accounts with its deposited ICCs. Section 6, *Buffer and Adjustment Accounts*, in ICRs Process Requirements, states:

> [*The adjustment credits from all CDR projects are held in a single pooled adjustment account administered by ICR. Adjustment ICCs can be drawn upon in the event of a reversal in carbon stocks or if projects fail to produce real GHG emission mitigation outcomes in any individual project where ICCs have been retired or have been transferred in an inactive state.*]

In this way, ICR can ensure and confirm that any reversals are fully compensated if such events occur in addition to obligations posed on project proponents in ICR terms and conditions.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In addition to the last submission, in late 2023, ICR revised the ICR requirement document, now stipulating in section 4.8.2 on non-permanence and reporting on reversal events.

In ICR process requirements updated in early 2024, ICR provides procedures for reporting on reversal events. Now, information about monitoring and reporting is in section 10.2 in the ICR process requirements and how reversals are compensated.

ICR manages a buffer account publicly on ICR registry. When ICR will be eligible for CORSIA, ICR will create a buffer account for any buffer credits that are eligible under CORSIA.

In section 4.8.2 ICR requirement document and section 4.4.1 in ICR process requirements proponents are now required to notify ICR within 30 days.

In the ICR process requirements, a detailed procedure for reporting through a reversal event report and compensation of any reversals after the next verification. In addition, in section 9 of the ICR process requirements, ICR has the right to assess the project. A reversal event could initiate such assessment; see also section 4.1 in Terms and Conditions - projects.

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.8.2
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.4.1
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 10.2
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.1
Reversal event report - ICR Program (carbonregistry.com)
Terms and Conditions - Project - ICR Program (carbonregistry.com)

Carbonregistry.com

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR has 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.

In section 6.2, *Buffer Adjustment Account Applicability*, in ICRs Process Requirements states that ICCs within the buffer adjustment account from different projects are functionally distinct, despite being administered in one pooled account in the ICR registry platform. Therefore, ICCs from the same project types will compensate reversal events for the same project type. ICR will retire ICCs out of the buffer adjustment account to compensate for reversals on a first in, first out rule after identifying which ICCs meet the criteria above for reversal compensation. However, the buffer adjustment account currently does not cover segregation of CORSIA eligible units from other ICCs. If deemed necessary, ICR can amend processes, and the registry platform fully supports such segregation.

2023 - application

N/A

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

The International Carbon Registry (ICR) maintains a public buffer account within its registry.

When the ICR becomes qualified for CORSIA, it will establish a separate buffer account specifically for those buffer credits that are eligible under CORSIA. These particular credits will be kept distinct and will not be combined with other buffer credits that lack a letter of attestation from the host country.

See:

Carbonregistry.com – International Carbon Registry (buffer adjustment account)

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 Assess and mitigate against potential increase in emissions elsewhere

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR approve existing and active methodologies approved by the Clean Development Mechanism, Verified Carbon Standard, and American Carbon Registry, and the sectoral scopes are:

1. Energy industries (renewable-/non-renewable sources)
2. Energy distribution
3. Energy demand
4. Manufacturing industries
5. Chemical industries
6. Construction
7. Transport
8. Mining/mineral production
9. Metal production
10. Fugitive emissions from fuels (solid, oil and gas)
11. Fugitive emissions from production and consumption of halocarbons and sulphur hexafluoride
12. Solvent use
13. Waste handling and disposal
14. Afforestation and reforestation
15. Agriculture
16. Carbon Capture and Storage/Carbon Removal

The leakage risks vary amongst sectors. Many of the sectors ICR approves present a potential risk of material leakage, the risk however depends on the design of the project activity and applied methodology. Among other, sectors such as energy industries and afforestation and reafforestation pose a potential risk of leakage. Afforestation, reafforestation, and REDD are examples where activities may drive deforestation to other forested areas and result in carbon leakage. However, methodologies set out requirements to account for the risk. Projects implementing projects based on approved methodologies shall therefore address the risk in the project design according to methods on quantifying any such identified leakage.

2023 - application

ICR approves existing and active methodologies approved by developed by or approved through ICR methodology approval process and the Clean Development Mechanism for the sectoral scopes are:

1. Energy industries (renewable-/non-renewable sources)
2. Energy distribution
3. Energy demand
4. Manufacturing industries
5. Chemical industries
6. Construction
7. Transport
8. Mining/mineral production
9. Metal production
10. Fugitive emissions from fuels (solid, oil and gas)
11. Fugitive emissions from production and consumption of halocarbons and sulphur hexafluoride
12. Solvent use
13. Waste handling and disposal
14. Afforestation and reforestation
15. Agriculture
16. Carbon Capture and Storage/Carbon Removal

The leakage risks vary amongst sectors. Many of the sectors ICR approves present a potential risk of material leakage, the risk however depends on the design of the project activity and applied methodology. Among other, sectors such as energy industries and afforestation and reafforestation pose a potential risk of leakage. Afforestation, reafforestation, and REDD are examples where activities may drive deforestation to other forested areas and result in carbon leakage. All projects need to conform to ISO 14064-2 which addressed leakage in section 6.3.
Irrespective of project sector projects need to address this in their documentation. Methodologies often set out requirements to account for the risk of leakage. Projects implemented relying on methodologies need to assess the risk in the project design according to methods on quantifying any such identified risk.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In addition to the last submission in section 4.8 in ICR Methodology requirements, it's stipulated specifically that any leakage shall be deducted from the quantification.

[Methodologies shall establish procedures to quantify leakage where the potential for leakage is identified. When

quantifying GHG emissions and/or removals achieved by the project, the sum of emissions resulting from project activities and leakage shall be withdrawn.]

See:
ICR Methodology Requirements 2.0 - ICR Program (carbonregistry.com) section 4.8
ICR Methodology Approval Process v2.0 - ICR Program (carbonregistry.com)

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Overall, it's important to note that projects account for leakages throughout the lifetime of the project in question, in accordance with the applied methodology and monitoring requirements. Projects are required to estimate such leakage depending on the assessed risk, what deductions are to be done from the projects accounted emissions, and how to monitor parameters appropriately. Having the above in mind, any sectors or projects activities that pose a risk of carbon leakage are assessed by an accredited third-party verification body, ensuring that these risks are addressed appropriately to ensure mitigation outcome results. In section 5.9 in ICR Requirement Document leakage is discussed, and further as requirements towards leakage is addressed in applied methodologies, the project proponent shall design the project in accordance with the requirements of ISO 14064-2, the requirements of applied methodology and the ICR requirements, as discussed in section 5.1 of the ICR Requirement Document.

Methodologies developed under ICR shall also address such risk in the methodology design as outlined in section 5.8 of the ICR Requirement Document, where the methodology developer shall establish procedures to quantify leakage, where the potential for leakage is identified. When quantifying GHG emissions and/or removals achieved by the project, the sum of emissions resulting from project activities and leakage shall be subtracted.

2023 - application

Overall, it's important to note that projects account for leakages throughout the lifetime of the project in question, in accordance with the applied methodology and monitoring requirements. Projects are required to estimate such leakage depending on the assessed risk, what deductions are to be done from the projects accounted emissions, and how to monitor parameters appropriately. Having the above in mind, any sectors or projects activities that pose a risk of carbon leakage are assessed by an accredited third-party verification body, ensuring that these risks are addressed appropriately to ensure mitigation outcome results.

In section 4.3, 4.7 and 4.8 in ICR requirement document leakage is discussed and especially in section 4.8.1, and further as requirements towards leakage is addressed in applied methodologies, the project proponent shall design the project in accordance with the requirements of ISO 14064-2, where leakage is discussed under section 6.3, the

requirements of applied methodology. When quantifying GHG emissions and/or removals achieved by the project, the sum of emissions resulting from project activities and leakage shall be subtracted.

From ISO (section 6.3)

[*The project proponent shall select or establish criteria and procedures for identifying and assessing GHG SSRs controlled, related to or affected by the project. Based on the selected or established criteria and procedures, the project proponent shall identify GHG SSRs relevant to the project as being:*
a) controlled by the project proponent;
b) related to the GHG project; or
c) affected by the GHG project.]

and from 4.8.1 in ICR requirement document

[*Potential sources of leakage (affected GHG SSRs), as identified in section 4.3, and the location of areas where leakage could occur shall be identified, accompanied by a description of any appropriate mitigation measures. Any leakage assessment shall be conservative, shall not account for positive leakage, and shall be subtracted from the quantification of GHG emission mitigations of the project. Any potential leakage shall be monitored. All leakage shall be deducted from the total GHG emission mitigations of the project and subtracted from the number of GHG emission mitigations eligible to be activated.*]

Methodologies developed under ICR shall also address such risk in the methodology design as outlined in section 5.8 of the ICR requirement document, where the methodology developer shall establish procedures to quantify leakage, where the potential for leakage is identified.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In addition to the last submission, in section 6.3 in ISO 14064-2 leakage is discussed and further in section 4.3 in ICR requirement document.

[The project proponent shall select or establish criteria and procedures for identifying and assessing GHG SSRs controlled, related to or affected by the project.

Based on the selected or established criteria and procedures, the project proponent shall identify GHG SSRs relevant to the project as being:

a) controlled by the project proponent;
b) related to the GHG project; or
c) affected by the GHG project.

A.3.2 provides guidance on identifying GHG SSRs relevant to the project.]

Further, when quantifying the GHG emission and/or removals section 6.7 discusses what to quantify.

[*The project proponent shall select or establish criteria and procedures or methodologies for quantifying GHG emissions and/or removals for selected GHG SSRs (see 6.6). Based on selected or established criteria and procedures or methodologies, the project proponent shall quantify GHG emissions and/or removals separately for:*

a) each relevant GHG for each GHG SSR relevant for the project;
b) each GHG SSR relevant for the baseline scenario.]

And 6.8.

[*The project proponent shall select or establish criteria and procedures or methodologies for quantifying GHG emission reductions and removal enhancements during project implementation and operation.*

The project proponent shall apply the criteria and methodologies selected or established to quantify GHG emission reductions and removal enhancements for the GHG project. GHG emission reductions or removal enhancements shall be quantified as the difference between the GHG emissions and/or removals from GHG SSRs relevant for the project and those relevant for the baseline scenario.

The project proponent shall quantify, as appropriate, GHG emission reductions and removal enhancements separately for each relevant GHG and its corresponding GHG SSRs for the project and the baseline scenario.]

In addition to the ISO requirements ICR complements for example with sections 4.3, 4.7 and 4.8.

4.3.
[*The project proponent shall describe, identify, and assess relevant GHG SSRs to the project and the baseline scenario and determine if they are controlled, related, or affected by the project (leakage), and if they shall be included or excluded. Any grounds for exclusion shall be demonstrated and justified. The project proponent may follow or rely on a methodology to determine the project boundary*
ICR has revised the ICR requirement document, and sections 6 and 7 are now under section 6, addressing validation in section 6.1 and verification in 6.2. Reference to sections 4.4 and 4.5 are still relevant.
See:

4.7
[*GHG emission mitigations achieved by the project activity and addressing leakage (GHG SSRs affected by the project) lay the foundation for the volume of ICCs that can be issued. Project proponents shall follow a methodology to quantify GHG emissions mitigations or establish criteria and procedures for the quantification. The quantification shall include all GHG SSRs identified and all GHGs and shall be reported in t CO2-e.*

The project proponent shall estimate GHG emissions mitigations for selected GHG SSRs separately for:

1. each relevant GHG for each GHG SSR relevant for the project;
2. each GHG SSR relevant for the baseline scenario.

Net GHG emissions and/or removals generated by the project activities shall be quantified and reported]

4.8
[*Based on criteria from section 4.7, the project proponent shall select and follow criteria from a methodology or establish criteria and procedures for quantifying aggregated GHG emission mitigations during the implementation and operation of the project to undertake ex-post calculations of GHG emission mitigations. The project proponent shall describe all steps to be undertaken, resulting in quantification as the net difference between the baseline and the GHG emissions mitigations considering leakage. The project proponent shall provide ex-post calculation and quantification of GHG emission mitigations for each monitoring period.*

The project proponent shall provide ex-ante projections for each monitoring period and for the total projections for the GHG emission mitigations for the crediting period.
The quantification shall convert all GHGs to t CO2-e.All ex-ante estimates and ex-post calculations shall be converted to CO2-e using GWP values from the IPCC AR5 unless earlier GWP values can be justified.

4.8.1 Leakage
Potential sources of leakage (affected GHG SSRs), as identified in section 4.3, and the location of areas where leakage could occur shall be identified, accompanied by a description of any appropriate mitigation measures. Any leakage assessment shall be conservative, shall not account for positive leakage, and shall be subtracted from the quantification of GHG emission mitigations of the project. Any potential leakage shall be monitored. All leakage shall be deducted from the total GHG emission mitigations of the project and subtracted from the number of GHG emission mitigations eligible to be activated.]

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.3
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.8

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR has procedures in place requiring and supporting activities to monitor identified leakage.

Approved methodologies, ICRs reference standards, and ICRs requirements set the monitoring requirements principles that project proponents shall follow.

First, section 7.3, *Leakage*, in ICRs Requirement Document states that it's required that all projects shall monitor and calculate leakage.

ICRs Project Design Description Template provides procedures supporting monitoring of leakage.
In section 4.8, *Leakages*, in ICRs Project Design Description Template, a description of the procedure for quantification of leakage emissions in accordance with the applied methodology is required. All relevant equations are to be included, and an explanation and justification of all relevant methodological choices are required (e.g., selecting emission factors and default values).

Further, section 4.9, *Net GHG Emission Mitigations,* in ICRs Requirement Document, states that a transparent calculation of expected leakages during the project's crediting period is requested, applying all relevant equations provided in the applied methodology, applied standardized baselines other applied documents.

In section 5.2, *Data and Parameters Monitored*, information on data and parameters needed for monitoring, e.g., calculated estimation of leakages, shall be described. This information shall reflect the required level of information to provide monitoring in accordance with the applied methodology and applied baselines.

With these guidelines at hand, project proponents have the necessary tools to monitor calculated leakage risks appropriately.

2023 - application

ICR has procedures in place requiring and supporting activities to monitor identified leakage.

ICRs requirements and ISO 14064-2 set the monitoring requirements principles that project proponents shall follow.

First, section 4.8.1, *Leakage*, in ICRs requirement document states that it's required that all projects monitor leakage, shall be deducted from the total GHG emission mitigations of the project and subtracted from the number of GHG emission mitigations eligible to be activated.

ICRs Project Design Description Template provides procedures supporting monitoring of leakage.
In section 8.1.3, *Leakages*, in ICRs Project Design Description Template, a description of the procedure for quantification of leakage emissions in accordance with the applied methodology is required. All relevant equations are to be included, and an explanation and justification of all relevant methodological choices are required (e.g., selecting emission factors and default values).

Further, section 4.8, *Quantifying GHG emission reductions and removal enhancements,* in ICRs Requirement Document, states:

[Based on criteria from section 4.7, the project proponent shall select and follow criteria from a methodology or establish criteria and procedures for quantifying aggregated GHG emission mitigations during the implementation and operation of the project to undertake ex-post calculations of GHG emission mitigations. The project proponent shall describe all steps to be undertaken, resulting in quantification as the net difference between the baseline and the GHG emissions mitigations considering leakage. The project proponent shall provide ex-post calculation of GHG emission mitigations for each monitoring period.]

In section 4.10, *Monitoring*, information on data and parameters needed for monitoring, e.g. for calculate leakages, shall be described. This information shall reflect the required level of information to provide monitoring procedures.

In the ICRs Monitoring report template project proponents report on monitoring and calculation of leakage in section 6.3.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previos application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.8.1
Project design description (PDD) – ICR Program (carbonregistry.com)
Monitoring report (MR) – ICR Program (carbonregistry.com)
Project design description and monitoring report – ICR Program (carbonregistry.com)

Are procedures in place requiring and supporting activities to monitor identified leakage? (*Paragraph 3.6.3*)	☒ YES

Summarize and provide evidence of the policies and procedures referred to above:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR has procedures requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities.

ICRs Requirement Document sets requirements for how leakages are to be addressed, both for project design and project implementation.

Section 5.9, *Leakage*, sets the requirements for project design are described.
[*project proponents shall identify potential sources of leakage and the location of areas where leakage could occur, and any appropriate mitigation measures described. Any leakage shall be subtracted from the number of ICCs eligible to be issued*]

Section 7.3, *Leakage,* sets the requirements for project implementation are described
[*projects shall monitor and calculate leakage. All leakage shall be deducted from the total GHG emission reductions and/or removals of the Project and subtracted from the number of GHG emission reductions and removals eligible to be activated*]

2023 - application

ICR has procedures requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities.

In section 4.8.1 *Leakage* ICRs requirement document sets requirements for how leakage shall be addressed, both for project design and project implementation.

> *[Potential sources of leakage (affected GHG SSRs), as identified in section 4.3, and the location of areas where leakage could occur shall be identified, accompanied by a description of any appropriate mitigation measures. Any leakage assessment shall be conservative, shall not account for positive leakage, and shall be subtracted from the quantification of GHG emission mitigations of the project. Any potential leakage shall be monitored. All leakage shall be deducted from the total GHG emission mitigations of the project and subtracted from the number of GHG emission mitigations eligible to be activated.]*

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In addition to last submission ICR has revised the ICR requirement document. In section 4.3 proponents shall identify GHG SSRs relevant to the project. Controlled, related or affected (leakage).

In section 4.10 it's stipulated that the monitoring plan shall include parameters, GHG SSR identified and according to section 4.6 and/or be in line with the applied methodology and the requirements of ISO 14064-2..

Both sections relate to the sections 6.3 and 6.10 in ISO 14064-2 respectively.

See further
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.3
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.10

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 – application

ICR has procedures requiring activities to deduct from their accounting emissions from any identified leakage that

reduces the mitigation benefits of the activities.

ICRs Requirement Document sets requirements for how leakages are to be addressed, both for project design and project implementation.

Section 5.9, *Leakage*, sets the requirements for project design are described.
[*project proponents shall identify potential sources of leakage and the location of areas where leakage could occur, and any appropriate mitigation measures described. Any leakage shall be subtracted from the number of ICCs eligible to be issued*]

Section 7.3, *Leakage,* sets the requirements for project implementation are described
[*projects shall monitor and calculate leakage. All leakage shall be deducted from the total GHG emission reductions and/or removals of the Project and subtracted from the number of GHG emission reductions and removals eligible to be activated*]

2023 - application

ICR has procedures requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities.

In section 4.8.1 *Leakage* ICRs requirement document sets requirements for how leakage shall be addressed, both for project design and project implementation.

[*Potential sources of leakage (affected GHG SSRs), as identified in section 4.3, and the location of areas where leakage could occur shall be identified, accompanied by a description of any appropriate mitigation measures. Any leakage assessment shall be conservative, shall not account for positive leakage, and shall be subtracted from the quantification of GHG emission mitigations of the project. Any potential leakage shall be monitored. All leakage shall be deducted from the total GHG emission mitigations of the project and subtracted from the number of GHG emission mitigations eligible to be activated.*]

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

See
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com)

Question 4.7 <u>Are only counted once towards a mitigation obligation</u>

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

a) The ICR has measures in place to ensure the transparent transfer of units between registries and prevent double-issuance.

ICR allows for transition from other GHG programs to ICR, in terms of transferring projects to ICR and issuing ICCs based on verified mitigation outcomes or splitting up mitigation outcomes from an activity or cancellation of credits with another registry, aiming to have ICCs issued for the project activity instead. This poses a risk of double issuance. For precautions, ICR has clear requirements for transitioning. Both are outlined in section 8 in ICRs Process Requirements and section 5.18 in ICR Requirement Document.

In the case of a transition scenario, ICR requires evidence that the project in question has not previously issued credits for the mitigation outcome that is subject to ICC issuance or that previously issued credits have been cancelled. The project proponent shall also sign and submit a formal letter describing conversion to ICCs in the case of cancellation of credits with another GHG program.

If projects have created another form of GHG-related environmental instruments, such as renewable energy certificates, evidence demonstrating that the mitigation outcome presented for ICC issuance has not been previously used or cancelled under this instrument, is required. Further description of requirements in the case of a transition scenario is available in section 8 in the ICRs Process Requirements.

All mitigation outcomes that transition from another registry to ICR are identified with *Credits transferred from other GHG program*.

Where the project proponent has cancelled credits issued under another GHG program and issuing ICCs instead, the project's reference number shall be noted in the ICR registry with relevant documentation confirming the cancellation.

b) ICR has measures to ensure that one unit is issued or transferred, owned by, or cancelled by only one entity, eliminating the risk of double accounting.

ICR has several ways of ensuring that double accounting is avoided. Ensuring that one unit is only issued or transferred once is done by requiring substantial proof that the mitigation outcome has not yet been used for credit issuance, as described for a transition scenario above. Ensuring that one unit is only owned or cancelled by one entity is done by having a robust framework for the beneficial owner's account where the account holder is the only one authorized to transfer, activate, retire, or cancel issued ICCs.

ICCs are serialized credits representing validated GHG emissions mitigations. Issued credits are delivered to the beneficial owner's account for transfer, activation, retirement, or cancellation. ICR does not allow for credit, having a unique traceable serialization number representing monitoring period and vintage, to be issued more than once.

Another measure to avoid double accounting, is described for transition scenarios in section 8 in the ICR Process Requirements, is for projects to not be included in any other voluntary or compliance GHG program. Also, if the project boundary overlaps with another GHG program of a similar nature, the project proponent shall demonstrate proof of no double accounting of mitigation outcome through the PDD and Validation and Verification.

All actions done to the ICCs, such as transfers, retirements, cancellations, executed through the ICR registry account, are logged in detail in the registry system audit logs. Once a credit is retired, no further status change is permitted. Such a track record will ensure avoidance of double accounting and transparency about transfers and statuses of ICCs.

c) ICR has measures in place to prohibit double selling of units.

The registry system prevents that ICCs can be held with more than one account, and all ICCs are issued with unique serial number series, which is split up when credits are transferred from and to accounts. Furthermore, once an ICC has been retired or cancelled, it is permanently removed from circulation and can no longer be sold (transferred) to another registry account. For retirements and cancellations, there is a field for demonstrating the reason for retirement/cancelation for the purpose of safeguarding that the entity retiring/cancelling the credit can demonstrate why and who was the beneficiary of the retirement/cancellation.

See further in Appendix D, *Emissions Unit Programme Registry Attestation*

d) Today, ICR has not implemented procedures and/or requirements to account for offsets 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.

However, ICR will implement measures, procedures, and requirements to meet the importance of the integrity of the CORSIA that units used under the CORSIA scheme are not claimed both by the flight operator or organization and the host country. Implementing procedures ICR will rely upon Guidelines on Avoiding Double Counting for CORSIA, resulting in procedures that allow interested project proponents to request that ICCs will qualify for meeting offsetting requirements under the CORSIA. However, the registry platform supports this functionality as projects/credits can be identified for "international transfer". That functionality is to accommodate preventing double accounting for ITMO transfers. ICR will adapt to how international collaboration will develop in the coming years. In relation to this, the VCM can support nations' National Determined Contributions (NDCs), go beyond NDCs, or both. The ICR is following developments and will adapt to all agreed-upon directions the VCM will take.

Proposed revisions: Internationally Transferred Mitigation Outcomes
ICR intends to amend procedures of the program as to facilitate for participation with Internationally Transferred Mitigation Outcomes. ICR will advise and consult with the PAMAP for approach and follow the intergovernmental direction in that sense. The revision is anticipated to be completed before the end of Q4 2022 subject to consultation with the PAMAP and final approval of the ICR Board.

Proposed revisions: CORSIA procedures
ICR intends to amend the procedures of the program to prevent double claiming of mitigations. The revision is anticipated to be completed before the end of Q3 2022 subject to consultation with the PAMAP, the TAB, and final approval of the ICR Board.

2023 - application

a) The ICR has measures in place to ensure the transparent transfer of units between registries and prevent double-issuance.

ICR allows for transition from other GHG programs to ICR, in terms of transferring projects to ICR and issuing ICCs based on verified mitigation outcomes or splitting up mitigation outcomes from an activity or cancellation of credits with another registry, aiming to have ICCs issued for the project activity instead. This poses a risk of double issuance. For precautions, ICR has clear requirements for transitioning from another registry (GHG program). Both are outlined in section 6 in ICRs Process Requirements and section 3.8 in ICR Requirement Document.

In the case of a transition scenario, ICR requires evidence that the project in question has not previously issued credits for the mitigation outcome that is subject to ICC issuance or that previously issued credits have been cancelled. The project proponent shall also sign and submit an official notification or other evidence of cancellation of the carbon credits under the approved GHG program and a signed application for conversion shall be provided to ICR.

If projects have created another form of GHG-related environmental instruments, such as renewable energy certificates, evidence demonstrating that the mitigation outcome presented for ICC issuance has not been previously used or cancelled under this instrument, is required. Further description of requirements in the case of a transition scenario is available in section 6 in the ICRs Process Requirements.

All mitigation outcomes that transition from another registry to ICR are identified with *Credits transferred from other GHG program* and reference made to the other registry.

Where the project proponent has cancelled credits issued under another GHG program and issuing ICCs instead, the project's reference number shall be noted in the ICR registry with relevant documentation confirming the cancellation.

b) ICR has measures to ensure that one unit is issued or transferred, owned by, or cancelled by only one entity, eliminating the risk of double accounting.

ICR has several ways of ensuring that double accounting is avoided. Ensuring that one credti is only issued or transferred once is done by requiring substantial evidence that the mitigation outcome has not yet been used for credit issuance, as described for a transition scenario above. Ensuring that one credit is only owned or retired by one entity is done by having a robust framework for the beneficial owner's account where the account holder is the only one authorized to transfer, activate, retire, or cancel issued ICCs.

ICCs are serialized credits representing validated GHG emissions mitigations. Issued credits are delivered to the beneficial owner’s account for transfer, activation, retirement, or cancellation. ICR does not allow for credit, having a unique traceable serialization number representing monitoring period and vintage, to be issued more than once.

Another measure to avoid double accounting, is described for transition scenarios in section 6 in the ICR Process Requirements, is for projects to not be included in any other voluntary or compliance GHG program and project proponents shall not issue instruments for the same GHG emission mitigations under ICR and another GHG program. Projects may, however, apply for transfer of registration to ICR. Also, if the project boundary overlaps with another GHG program of a similar nature, the project proponent shall demonstrate proof of no double accounting of mitigation outcome through the PDD and Validation and Verification.

All actions done to the ICCs, such as transfers, retirements, cancellations, executed through the ICR registry account, are logged in detail in the registry system audit logs. Once a credit is retired, no further status change is

permitted. Such a track record will ensure avoidance of double accounting and transparency about transfers and statuses of ICCs.

c) ICR has measures in place to prohibit double selling of units.

The registry system prevents that ICCs can be held with more than one account, and all ICCs are issued with unique serial number series, which is split up when credits are transferred from and to accounts. Furthermore, once an ICC has been retired or cancelled, it is permanently removed from circulation and can no longer be sold (transferred) to another registry account. For retirements and cancellations, there is a field for demonstrating the reason for retirement/cancelation for the purpose of safeguarding that the entity retiring/cancelling the credit can demonstrate why and who was the beneficiary of the retirement/cancellation.

Further marketplaces are required to disclose retirements and distribution of credits to ICR, in particular section 6.2 in ICR terms and conditions

> [*The account holder may retire ICCs, GOs or other instruments on behalf of one or more third parties, provided that a market participant makes any such retirement in the manner outlined in the operating procedures and all legal title to and all beneficial ownership rights in any ICCs or GOs retired by a market participant must be held by one or more individuals or organizations, collectively the indirect owners, that have authorized the market participant in writing to retire such ICCs or GOs or other instruments on their behalf and to provide any data or other information relating to such ICC or GO or other instruments to the administrator; and any retirement of any ICC or GO or other instruments shall be effected solely on behalf of the applicable indirect owners*]

See further in Appendix D, *Emissions Unit Programme Registry Attestation*

d) ICR has implemented procedures and/or requirements to account for offsets 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.

Section 3.10 *Host country attestation* states:

> [*Projects that intend to be eligible for international trading shall obtain and submit a letter of assurance and authorization from the host country or countries where the emission mitigations occur.]*

Under serialization of credits issued, credits that are eligible for international transfers, e.g. under CORSIA are identified specifically. See further under Appendix D.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

Since the last submission ICR has revised ICR requirement document and ICR process requirements. In addition to

the information provided last submission ICR would like to add:

a. In section 3.8 in ICR requirement document improved details are provided relating to double issuance.

   [*Projects registered with other GHG programs may apply for transfer registration to ICR or be jointly registered. When registering with ICR, all previous documentation regarding the project activities shall be made available for ICR and the VVB and the project shall complete a gap validation. The project shall not issue ICCs for the same monitoring period as issued in the corresponding GHG program or scheme. The ICR process requirements discuss requirements for transitioning from other GHG programs.]*

   Furter ICR has procedures if a projects intends to withdraw from the ICR program as outlined in section 7 in the ICR process requirements where ICR reviews any transfers and outstanding ex-ante or ex-post ICCs.

   See:
   ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 3.8
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 7

b. *In section 5.1 in ICR process requirements procedures on transfers are provided.*

   [Transfers involve transferring a set number of ICCs from one registry account to another. This process includes changing the rights to beneficial ownership of GHG emissions mitigations they represent as defined in ICR definitions. ICR registry functionality always guarantees instrument delivery, and buyers can always expect to have ICCs delivered.]

   When transfers are completed beneficial ownership to the ICC changes and the right to the GHG emission mitigations they represent as defined in Terms and conditions in section 6.

   See:
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 5.1
   Terms and Conditions - Organizations - ICR Program (carbonregistry.com) section 6

c. As ICCs are natively issued on blockchain ICR has the overall control of inventory of credits. They can only be minted by ICR admin. This prevents any double issuance or selling of the same instrument, especially where at the time of cancellation/retirement where ICCs are transferred to the buyer/final beneficiary of the credit as outlined in section 5 of ICR process requirements.

   See:
   ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 5
   On Chain - ICR Program (carbonregistry.com)

d. In the template letter of attestation, clear and concise language is provided on obligations the host country undertakes for a corresponding adjustment.

See:
Letter of attestation - ICR Program (carbonregistry.com)

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Today ICR has not implemented procedures and/or requirements to accommodate a)-c). However, as discussed above, ICR will implement measures, procedures, and requirements to meet the importance of the integrity of the CORSIA and that units used under the CORSIA scheme are not claimed both by the flight operator (or organization) and the host country. Implementing procedures ICR will rely upon Guidelines on Avoiding Double Counting for CORSIA, resulting in procedures that allow interested project proponents to request that ICCs will qualify for meeting offsetting requirements under the CORSIA

2023 - application

ICR has implemented procedures and/or requirements to accommodate a)-c). During registration of projects they are invited to upload letter of attestation. Letter of attestation will be publicly disclosed in the registry. ICR is finalizing implementation on procedures to meet the importance of the integrity of the CORSIA, (or due to other claims) and that units used under the CORSIA scheme are not claimed both by the flight operator (or organization) and the host country by sharing information on retired credits eligible for international trading. Implementing procedures ICR will rely upon Guidelines on Avoiding Double Counting for CORSIA, resulting in procedures that allow interested project proponents to request that ICCs will qualify for meeting offsetting requirements under the CORSIA.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

Since last submission ICR has revised the ICR requirement documents and ICR process requirements. Further ICR has developed a template for host country attestation.

In section 3.8 of the ICR requirement document, requirements are provided for double counting, issuances and claiming.

[*Where GHG emission mitigations will be used for reporting purposes under the accounting rules set out by the Paris Agreement or other emission trading programs (such as CORSIA) operating under the accounting framework of the Paris Agreement (international trading), they shall conform to all relevant requirements of that market, including measures to prevent double claiming, i.e. corresponding adjustment. Project proponents shall provide evidence that the GHG emission mitigations generated by their project, and used for reporting, have fully conformed (or will conform) with all relevant market requirements. This evidence shall be utilized to designate ICCs that meet the specific market criteria.*]

In addition, in section 3.10 host country attestation requirements are provided.

See.
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 3.8
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 3.10
Letter of attestation - ICR Program (carbonregistry.com)

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

The ICR program was developed before the rulebook on article 6 was finalized and primarily focused on how VCM have developed during the Kyoto Protocol era. During the Paris agreement, the VCM will adapt to how international collaboration develops. In relation to this, the VCM can support nations' National Determined Contributions (NDCs), go beyond NDCs, or both. The ICR is following developments and will adapt to all internationally agreed-

upon direction the VCM will take. Further, as discussed above, ICR will implement measures, procedures, and requirements to meet the importance of the integrity of the CORSIA and that units used under the CORSIA scheme are not claimed both by the flight operator (or organization) and the host country, e.g., by providing attestation from the host country.

2023 - application

As per the requirements set out in section 3.10 of the ICR requirement document, project proponents shall obtain and submit a letter of assurance and authorization from the host-country for corresponding adjustment that may be used as mitigation associated with credits used by operators under CORSIA from also being claimed toward a host country's NDCs.

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

Since last submission ICR has revised the ICR requirement documents and ICR process requirements. Further ICR has developed a template for host country attestation.

In section 3.8 of the ICR requirement document requirements are provided for double counting, issuances and claiming.

In the registry, if a project intends to be compliant with international transfers, a letter of attestation needs to be publicly uploaded. Guidelines are provided in the ICR user guide.

In ICR serialization ICCs that are eligible for international transfers (decision /CMA.3), there is a field specifically for such credits in section ICR process requirements.

Component	Order	Type	Length	Range	Comment
Credit identifier	1	Letter	3	Text	Fixed value. Unique registry identifier. (ICC, FCC)
Project Country	2	Letter	3	ISO 3166-1	Three-letter country code for the project (e.g., Iceland is ISL).
Project country dialing code	3	Numeric	3	1-999	Three-digit country code for the project (e.g., Iceland is 354).
Project ID	4	Numeric	4	1-9999	Registry assigned identifier for the project, unique in the registry.
Sector	5	Numeric	2	1-16	Sectors from CDM
Type	6	Letter	1	A, R, H	Avoidance, Removal, Hybrid
Host country attestation	7	Numeric	1	1;0	1 = Yes, 0 = No attestation
Vintage (Year)	8	Numeric	4	0-9999	The vintage year of the credits.

Multiple project activities	9	Numeric	3	0-999	ID of a sub-project. If not multiple project activities, this identifier is not used.

See
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 3.8
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 4.1
Registry user guide - ICR Program (carbonregistry.com)

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. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

The ICR registry platform can accommodate disclosing all attestation from host countries to prevent mitigation associated with units used by organizations from also being claimed toward a host country's national mitigation targets or pledges. As discussed above, the ICR will further adapt to the Guidelines on Avoiding Double Counting for CORSIA in the implementation of all procedures regarding compliance with ICAOs Carbon Offset Credit Integrity Assessment Criteria.

2023 - application

The ICR registry platform accommodates uploading of attestation from host countries to prevent mitigation associated with units used by operators from also being claimed toward a host country's NDCs. As discussed above, the ICR will further adapt to the Guidelines on Avoiding Double Counting for CORSIA in the implementation of all procedures regarding compliance with ICAOs Carbon Offset Credit Integrity Assessment Criteria. Further project proponents need to upload attestations from host countries to the ICR registry platform.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

Since the last submission ICR has revised the ICR requirement documents and ICR process requirements. Further ICR has developed a template for host country attestation.

In the registry platform when uploading a letter of attestation it becomes a publicly available document.

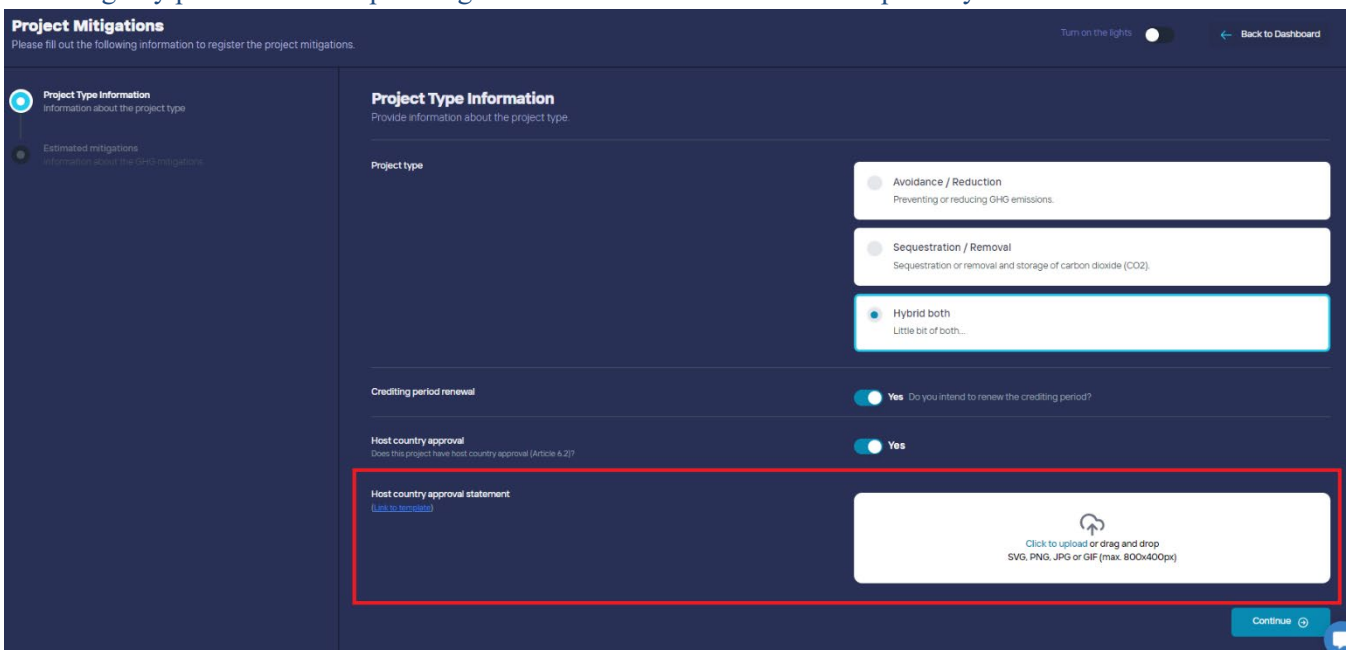


Figure 7: letter of attestation upload

If the status of approval changes, that shall be reflected in monitoring and verification reports.
A new letter can be uploaded to the registry during the submission of monitoring and verification reports.

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

Today ICR has not implemented procedures 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. However, as discussed above, ICR will implement measures, procedures, and requirements to meet the importance of the integrity of the CORSIA and that units used under the CORSIA scheme are not claimed both by the flight operator (or organization) and the host country. Implementing procedures ICR will rely upon Guidelines on Avoiding Double Counting for CORSIA, resulting in procedures that allow interested project proponents to request that ICCs will qualify for meeting offsetting requirements under the CORSIA

2023 - application

N/A

B. Summary and accompanying evidence of <u>any</u> updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

ICR is compiling a white paper for the nations hosting projects enrolled in the ICR program, aimed at enabling them to make the necessary steps to ensure integrity of any letter of attestation prepared by a national authority. Should there be any instance of double claiming, ICR will evaluate each instance and decide on the appropriate measures if it turns out that the required adjustments for a specific GHG emission mitigation have not been executed. Initially, ICR intends to address any accounting inconsistencies directly with the involved parties. ICR intendes to have this white paper issued by end of Q2 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:

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR is actively following development in the VCM and its integration with Article 6 of the Paris Agreement with regard to Internationally Transferrable Mitigation Outcomes and Corresponding Adjustments. It is anticipated that the ICR will have implemented procedures in Q4 2022 to address how project activities will be able to participate under the article 6 mechanism and therefore require host country authorization for international transfers and associated corresponding adjustments. The ICR will further adapt to the Guidelines on Avoiding Double Counting for CORSIA in the implementation of all procedures regarding compliance with ICAOs Carbon Offset Credit Integrity Assessment Criteria anticipated to be finalized in Q3 2022. Therefore, in advance of TABs finalized assessment and recommendation to ICAO, ICR will have implemented measures that prevent double claiming of mitigation associated with units used under CORSIA, adhering to any internationally agreed upon requirements to prevent double accounting. Such implementation and adherence will ensure the ICR programs' environmental integrity of mitigation outcomes. Further, in this application form, ICR has demonstrated that procedures are in place to prevent and avoid double accounting and claiming, these procedures will be revised 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.

2023 - application

Adjustment credits will compensate for this risk. ICR will ensure that there is will be an attestation from the host-country if mandatory. To clarify however, proponents are not responsible for compensating for double claimed mitigations if the host country fails to do a corresponding adjustment with their NDC.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

Since the last submission ICR has revised the ICR requirement documents and ICR process requirements. In section 9 of the ICR process requirements ICR has the permission to assess conformity of projects to the program requirements and principles. In the case of an assessment proponents may be required to compensate for any over issuances of credits.

See:
ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) section 9

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:
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR has procedures to ensure that projects do not violate any applicable local, state/provincial, national, or international regulations or obligations related to the activity's net environmental benefits and mitigation outcomes. Such procedures are ensured through the adopted reference standards integrated throughout ICRs operations. ICR Requirement Document is structured to be consistent with principles, requirements, and guidance of:

- International Organization for Standardization ISO 14064-2, ISO 14064-3, ISO 14065, and ISO 14066 (ISO).
- World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI) - The GHG Protocol for Project Accounting (WBCSD/WRI)
- Clean Development Mechanism/Joint Implementation (CDM/JI), Voluntary Carbon Standard (VCS), Gold Standard (GS), and other GHG Programs

Further, regarding projects not violating any applicable local, state/provincial, national, or international regulations or obligations that are related to the activity's net environmental benefits and mitigation outcomes, the following is required:

Section 5.13, *Safeguards,* in the ICRs Requirement Document, states:

> [*The Project proponent shall address all negative environmental and socio-economic impacts of the project activities and input received during a consultation with local stakeholders and ongoing communications*]

Section 3.1, *Statutory Requirements*, in the ICRs Project Design Description Template, states:

> [*project proponents shall identify relevant local, regional and international laws, statutes, and regulatory frameworks and demonstrate compliance*]

2023 - application

ICR has procedures to ensure that projects do not violate any applicable local, state/provincial, national, or international regulations or obligations related to the activity's net environmental benefits and mitigation outcomes. Such procedures are ensured through the adopted reference standards integrated throughout ICRs operations. ICR Project Requirement Document is structured to be consistent with principles, requirements, and guidance of:

- International Organization for Standardization ISO 14064-2, ISO 14064-3, ISO 14065, and ISO 14066 (ISO).
- World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI) - The GHG Protocol for Project Accounting (WBCSD/WRI)
- Clean Development Mechanism/Joint Implementation (CDM/JI) emerged during the Kyoto protocol and voluntary GHG programs.

Further, regarding projects not violating any applicable local, state/provincial, national, or international regulations or obligations that are related to the activity's net environmental benefits and mitigation outcomes, the following is required:

Section 5.13, Safeguards, in the ICRs Requirement Document, states:

> [*Project proponents shall identify the project's negative environmental and socio-economic impacts and engage with local stakeholders during the project design and implementation of the activities. All projects shall undergo a 30-day public comment period. The project proponent shall respond to all comments received and demonstrate actions implemented to the VVB.*
>
> *The project proponent shall implement a process of continuous communication with local stakeholders.*
>
> *The project proponent shall recognize, respect, and support local property rights and not infringe on private or public property. The project proponent shall not relocate people off their lands without consent, and when relocation occurs, it shall be carried out with just and fair compensation.*
>
> *The project shall minimize and, where possible, avoid negative environmental and social impacts. If present, the project proponent shall address all negative environmental and socio-economic impacts arising from the project activities and input received during a consultation with local stakeholders and ongoing communications.*

Where applicable, project proponents shall minimize the risk of damage to ecosystems by considering:

(a) not introducing invasive species or allowing an invasive species to thrive through project activities.

(b) the use of non-native species over native species and their potential adverse effects.

(c) the use of fertilizers, chemical pesticides, biological control agents, and other inputs used by the project and their possible adverse effects.

Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission mitigations.]

Section 3, *Safeguards*, in the ICRs Project design description template, allows project proponents to disclose how they identify relevant regulatory, potential environmental and socio-economic impact, consultation with interested parties, potential environmental impact assessment in sub-sections 3.1-3.6:

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.

https://documentation.carbonregistry.com/documentation/

See

ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.2.1

Project design description (PDD) - ICR Program (carbonregistry.com)

Project design description and monitoring report - ICR Program (carbonregistry.com)

Monitoring report (MR) - ICR Program (carbonregistry.com)

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 - application

ICR aims to support facilitating financing of climate projects while safeguarding environmental integrity and contributing to a sustainable and low-carbon economy; thus, safeguarding systems are inherent in the overall procedures. In ICRs Requirement Document, section 5.13, how ICR ensures safeguarding of environmental and social risks. Overall, project proponents shall identify and address projects' negative environmental and socio-economic impacts, and collaborate with local stakeholders prior to, during, and after implementation of activities to ensure environmental and social integrity throughout the project. If mitigation activities involve deviations from the PDD, the proponent shall update it.

ICR ensures safeguarding by requiring the project proponent to identify, familiarize itself with, and include any relevant social and environmental factors in the PDD.

In section 3, Safeguards, in the Project Design Description Template, project proponents are asked to identify any relevant statutory requirements, identify any potential negative environmental and socio-economic impacts, identify interested parties to the project for consultation, and a description of measures and steps taken to mitigate risk.

2023 - application

ICR aims to support facilitating financing of climate projects while safeguarding environmental and socio-economic integrity and contributing to a sustainable and low-carbon economy; thus, safeguarding systems are inherent in the overall procedures. In ICRs requirement document, section 4.2.1, addresses how ICR ensures safeguarding of environmental and social risks. Overall, project proponents shall identify and address projects' negative environmental and socio-economic impacts, and collaborate with local stakeholders prior to, during, and after implementation of activities to ensure environmental and social integrity throughout the project. If mitigation activities involve deviations from the PDD, the proponent shall update it.

In section 3, Safeguards, in the Project Design Description Template, project proponents are asked to identify any relevant statutory requirements, identify any potential negative environmental and socio-economic impacts, identify interested parties to the project for consultation, and a description of measures and steps taken to mitigate risk.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):

Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

See
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.2.1
Project design description (PDD) - ICR Program (carbonregistry.com)
Project design description and monitoring report - ICR Program (carbonregistry.com)
Monitoring report (MR) - ICR Program (carbonregistry.com)

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*)
A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

2022 – application

To ensure that such safeguards are in effect and adopted by project proponents, there is a 30-day public comment period on projects where the VVB will assess the project's conformity to these principles (Section 5.13, paragraph 4, ICRs Requirements Document)

2023 - application

To ensure that such safeguards are in effect and adopted by project proponents, there is a 30-day local stakeholder comment period on projects where the VVB will assess the project's conformity to these principles (Section 4.2.1, in ICRs requirements document)

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the previous application or the Council's approval of programme eligibility (*if none, "N/A"*):
Since the last application all documentation relating to the ICR program has been moved and is now available on ICR documentation page accessible using following the publicly available link.
https://documentation.carbonregistry.com/documentation/

In addition to submission in 2023 there's worth mentioning that proponents shall implement ongoing communication with stakeholders according to section 4.2.1 in ICR requirement document.

[*Project proponents shall identify the project's potential negative environmental and socio-economic impacts and engage with local stakeholders during the project design and implementation of the activities. All projects shall undergo a 30-day public comment period and the project proponent shall implement a process of continuous communication with local stakeholders. The project proponent shall respond to all comments received and demonstrate actions implemented to the VVB. Stakeholders may continue to submit comments which shall be considered during subsequent verification.*]

ICR further issued a new document late 2023, ICR validation and verification specifications. ICR validation and verification specifications are developed with the structure of ISO 14064-3 in mind. All VVB shall follow ISO 14064-3 for validation for conformity to ISO 14064-2, but for requirements in the ICR requirement document, the ICR validation and verification specifications address ICR-specific requirements.

See:
ICR Requirement Document v5.0 - ICR Program (carbonregistry.com) section 4.2.1
Project design description (PDD) - ICR Program (carbonregistry.com)
Project design description and monitoring report - ICR Program (carbonregistry.com)
Monitoring report (MR) - ICR Program (carbonregistry.com)

PART 5: Programme comments

Are there any additional comments the programme wishes to make to support the information provided in this form?
The ICR would like to address that during the last submission, public comment was submitted to ICAO by Mr. Wayne Sharpe of Global Environmental Markets. See icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/public comments_2023.pdf.

In TABs initial clarification questions, ICR was requested to respond to the public comment addressed to the ICR. In June 2024 ICR responded to the initial clarification questions and provided detailed response to allegations made in the public comment. In November 2023 the documentation of TABs assessment was published along with public comments received. At the same time, ICR's response to the allegations made by Mr. Sharpe was omitted from public disclosure, giving the public the perception that the ICR did not respond them.

Public commenting should ideally serve as a platform for informed and respectful dialogue. It's concerning that individuals and organizations may misuse these open channels to disseminate unfounded accusations without facing consequences. While such instances can occur on any platform, including ICAO's, it underscores the need for robust moderation processes. We trust that revisions to TAB's disclosure guidelines will address this issue, ensuring that only substantiated and constructive feedback is shared, thus maintaining the integrity of the discourse.

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:

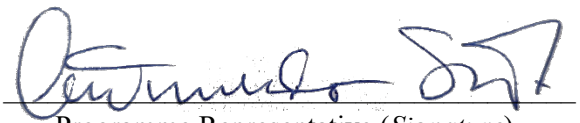
the Programme's participation in the assessment does not guarantee, equate to, or prejudge future decisions by Council regarding CORSIA-eligible emissions units; and

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:

Guðmundur Sigbergsson	3-3-2024
Full name of Programme Representative (*Print*)	Date signed (*Print*)



Programme Representative (*Signature*)

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

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

Programme Application Form, Appendix A

Supplementary Information for Assessment of Emissions Unit Programmes

1. About the Assessment Process and Supplementary Information

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 emission units upon recommendations by its Technical Advisory Body (TAB) and consistent with the CORSIA emissions unit eligibility criteria (EUC) contained in this document.

In March 2019, the ICAO Council unanimously approved the EUC for use by TAB in undertaking its tasks. At the same time, the ICAO Council also approved the 19 members of TAB. In January and November 2020, September 2021 and September 2022, TAB completed the first, second, third and fourth assessment of applicant programmes respectively, and submitted recommendations to Council for consideration.

Now, ICAO invites emissions unit programmes[1] to apply for the 2024 cycle of assessment by the TAB, which will involve collecting information from each programme through a programme application form and supplementary materials and requested evidence[2].

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, which will then be considered by the ICAO Council.

This Appendix A to the Programme Application Form contains the Council-approved EUC. Some of these EUC are accompanied by *Guidelines for Criteria Interpretation*. These EUC and *Guidelines* are provided to inform programmes' completion of the application form in which they are cross-referenced **by paragraph number**.[3]

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

[2] Available on the ICAO CORSIA website: https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx

[3] 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

2. CORSIA Emissions Unit Eligibility Criteria

Programme Design Elements. At the programme level, ICAO should ensure that eligible offset credit programmes meet the following design elements:

2.1. Clear Methodologies and Protocols, and their Development Process—Programmes should have qualification and quantification methodologies and protocols in place and available for use as well as a process for developing further methodologies and protocols. The existing methodologies and protocols as well as the process for developing further methodologies and protocols should be publicly disclosed.

2.2. Scope Considerations—Programmes should define and publicly disclose the level at which activities are allowed under the programme (e.g., project based, programme of activities, etc.) as well as the eligibility criteria for each type of offset activity (e.g., which sectors, project types, or geographic locations are covered).

2.3. Offset Credit Issuance and Retirement Procedures—Programmes should have in place procedures for how offset credits are: (a) issued; (b) retired or cancelled; (c) subject to any discounting; and, (d) the length of the crediting period and whether that period is renewable. These procedures should be publicly disclosed.

2.4. Identification and Tracking—Programmes should have in place procedures that ensure that: (a) units are tracked; (b) units are individually identified through serial numbers: (c) the registry is secure (i.e., robust security provisions are in place); and (d) units have clearly identified owners or holders (e.g., identification requirements of a registry). The programme should also stipulate (e) to which, if any, other registries it is linked; and, (f) whether and which international data exchange standards the registry conforms with. All of the above should be publicly disclosed information.

2.4.1. Guidelines for interpretation of the "Identification and Tracking" criterion

2.4.2. *Registry use*: The programme should utilize an electronic registry (or registries) in order to comply with the criterion for emissions unit identification and tracking.

2.4.3. *Unit identification*: The programme registry (or registries) should be capable of transparently identifying emissions units that are deemed ICAO-eligible, in all account types.

2.4.4. *Unit transfer and tracking*: The programme registry (or registries) should facilitate the transfer of unit ownership and/or holding; and transparently identify unit status, including issuance, cancellation, and issuance status (see also paragraph 3.3.5: *Identification of units issued* ex ante).

2.4.5. *Unique serialization*: The programme should have policies[4] in place requiring the programme registry (or registries) to assign to each emissions unit a unique serial number; identify units' country and sector of origin, vintage, and original (and, if relevant, revised) project registration date.

[4] E.g., Programme registry requirements for internal or third-party registry administration.

2.4.6. *Registry administrator conflicts of interest*: Programmes should avoid administrator conflicts of interest and should have policies in place that prevent programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services.[5] Where such conflicts arise, and are appropriately declared, programmes should have robust procedures in place to address and isolate the conflict.

2.4.7. *Registry account screening*: The programme should have provisions in place ensuring the screening of requests for registry accounts; and restricting programme registry (or registries) accounts to registered businesses and individuals.

2.4.8. *Registry security review*: The programme should have provisions in place ensuring the periodic audit or evaluation of registry compliance with security provisions.

2.5. Legal Nature and Transfer of Units—The programme should define and ensure the underlying attributes and property aspects of a unit, and publicly disclose the process by which it does so.

2.6. Validation and Verification procedures—Programmes should have in place validation and verification standards and procedures, as well as requirements and procedures for the accreditation of validators and verifiers. All of the above-mentioned standards, procedures, and requirements should be publicly disclosed.

2.7. Programme Governance—Programmes should publicly disclose who is responsible for administration of the programme and how decisions are made.

2.7.1. Guidelines for interpretation of the "Programme Governance" criterion

2.7.2. *Programme longevity*: The programme should demonstrate that is has been continuously governed and operational for at least the last two years; and that it has in place a plan for the long-term administration of multi-decadal programme elements which includes possible responses to the dissolution of the programme in its current form;

2.7.3. *Programme administrator and staff conflicts of interest*: Programmes should avoid administrator and staff conflicts of interest and should have policies in place that prevent programme staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of programme services. Where such conflicts arise, and are appropriately declared, programmes should have procedures in place to address and isolate the conflict.

2.7.4. *Liability coverag*e: If the programme is not directly and currently administered by a public agency, the independent administrator should demonstrate up-to-date professional liability insurance coverage of at least USD$5M.

2.8. Transparency and Public Participation Provisions—Programmes should publicly disclose (a) what information is captured and made available to different stakeholders; and (b) its local stakeholder consultation requirements (if applicable) and (c) its public comments

[5] Fees-for-service (e.g., account administration fees) do not constitute a conflict of interest.

provisions and requirements, and how they are considered (if applicable). Conduct public comment periods and transparently disclose all approved quantification methodologies.

2.9. Safeguards System—Programmes should have in place safeguards to address environmental and social risks. These safeguards should be publicly disclosed.

2.10. Sustainable Development Criteria—Programmes should publicly disclose the sustainable development criteria used, for example, how this contributes to achieving a country's stated sustainable development priorities, and any provisions for monitoring, reporting and verification.

2.11. Avoidance of Double Counting, Issuance and Claiming—Programmes should provide information on how they address double counting, issuance and claiming in the context of evolving national and international regimes for carbon markets and emissions trading.

3. Carbon Offset Credit Integrity Assessment Criteria

There are a number of generally agreed principles that have been broadly applied across both regulatory and voluntary offset credit programmes to address environmental and social integrity. These principles hold that offset credit programmes should deliver credits that represent emissions reductions, avoidance, or sequestration that:

- Are additional.
- Are based on a realistic and credible baseline.
- Are quantified, monitored, reported, and verified.
- Have a clear and transparent chain of custody.
- Represent permanent emissions reductions.
- Assess and mitigate against potential increase in emissions elsewhere.
- Are only counted once towards a mitigation obligation.
- Do no net harm.

Eligibility criteria should apply at the programme level, as the expertise and resources needed to develop and implement ICAO emissions criteria at a methodology and project level is likely to be considerable.

3.1. *Eligibility Criterion*: Carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional—Additionality means that the carbon offset credits 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, and that exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario. Eligible offset credit programmes should clearly demonstrate that the programme has procedures in place to assess/test for additionality and that those procedures provide a reasonable assurance that the emissions reductions would not have occurred in the absence of the offset programme. If programmes pre-define certain activities as automatically additional (e.g., through a "positive list" of eligible project types), then they have to provide clear evidence on how the activity was determined to be additional. The criteria for such positive lists should be publicly disclosed and conservative. If programmes do not use positive lists, then project's additionality and baseline setting should be assessed by an accredited and independent third-party verification entity and reviewed by the programme.

3.1.1. Guidelines for interpretation of the "Additionality" criterion

3.1.2. *Additionality analyses/tests*: The programme should have procedures in place to ensure — and to support activities to analyze and demonstrate — that credited mitigation is additional, on the basis of one or more of the following methods, which can be applied at the project- and/or programme- level : (A) Barrier analysis; (B) Common practice / market penetration analysis; (C) Investment, cost, or other

financial analysis; (D) Performance standards / benchmarks; (E) Legal or regulatory additionality analysis as defined in paragraph 3.1.

3.1.3. *Non-traditional or new analyses/tests*: If programme procedures provide for the use of method(s) not listed above, the GMTF, or other appropriate technical expert body, should evaluate and make a recommendation regarding the sufficiency of the approach prior to any final determination of the programme's eligibility.

3.2. *Eligibility Criterion*: Carbon offset credits must be based on a realistic and credible baseline—Carbon offset credits should be issued against a realistic, defensible, and conservative baseline estimation of emissions. The baseline is the level of emissions that would have occurred assuming a conservative "business as usual" emissions trajectory i.e., emissions without the emissions reduction activity or offset project. Baselines and underlying assumptions must be publicly disclosed.

3.2.1. Guidelines for interpretation of the "Realistic and credible baselines" criterion

3.2.2. *Conservative baseline estimation*: The programme should have procedures in place to ensure that methods of developing baselines, including modeling, benchmarking or the use of historical data, use assumptions, methodologies, and values that do not over-estimate mitigation from an activity.

3.2.3. *Baseline revision*: The programme should have procedures in place for the activities it supports to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration.

3.3. *Eligibility Criterion*: Carbon offset credits must be quantified, monitored, reported, and verified—Emissions reductions should be calculated in a manner that is conservative and transparent. Offset credits should be based on accurate measurements and quantification methods/protocols. Monitoring, measuring, and reporting of both the emissions reduction activity and the actual emissions reduction from the project should, at a minimum, be conducted at specified intervals throughout the duration of the crediting period. Emissions reductions should be measured and verified by an accredited and independent third-party verification entity. *Ex-post* verification of the project's emissions must be required in advance of issuance of offset credits; Programmes that conduct *ex-ante* issuance (e.g., issuance of offset units before the emissions reductions and/or carbon sequestration have occurred and been third-party verified) should not be eligible. Transparent measurement and reporting is essential, and units from offsetting programmes/projects eligible in a global MBM should only come from those that require independent, *ex-post* verification.

3.3.1. Guidelines for interpretation of the "Quantified, monitored, reported and verified" criterion

3.3.2. *Validation provisions*: The programme should have provisions in place requiring validation, prior to or in tandem with verification, to assess and publicly document the likely result of the mitigation from proposed activities supported by the programme.

3.3.3. *Auditor conflicts of interest*: Programmes should have provisions in place 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.[6] The provisions should require such accredited third parties 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. The programme should have provisions in place to address and isolate such a conflict should it be identified.

3.3.4. *Re-evaluation of assumptions*: The programme should have procedures in place requiring that 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; the same procedures should apply to activities that wish to undergo verification but have not done so within the programme's allowable number of years between verification events.

3.3.5. *Identification of units issued ex ante*: Programmes that support both the *ex ante* and *ex post* issuance of emissions units should have procedures in place to transparently identify units which are issued *ex ante* and thus ineligible for use in the CORSIA.

3.4. *Eligibility Criterion*: Carbon offset credits must have a clear and transparent chain of custody within the offset programme—Offset credits should be assigned an identification number that can be tracked from when the unit is issued through to its transfer or use (cancellation or retirement) via a registry system(s).

3.5. *Eligibility Criterion*: Permanence—Carbon offset credits must represent emissions reductions, avoidance, or carbon sequestration that are permanent. If there is risk of reductions or removals being reversed, then either (a) such credits are not eligible or (b) mitigation measures are in place to monitor, mitigate, and compensate any material incidence of non-permanence.

3.5.1. Guidelines for interpretation of the "Permanence" criterion

3.5.2. *Risk assessment*: The programme should have provisions in place to require and support activities operating within any sectors/activity types that present a potential risk of reversal to undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals.

3.5.3. *Reversal risk monitoring and mitigation*: The programme should have provisions in place to require and support activities operating within any sectors/activity types that present a potential risk of reversal to (A) monitor identified risks of reversals; and (B) mitigate identified risks of reversals.

3.5.4. *Extent of compensation provisions*: The programme should have provisions in place to ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA.

3.5.5. *Reversal notification and liabili*ty: The programme should have provisions in place which confer liability to the activity proponent to monitor, mitigate, and respond to

[6] Fees-for-service (e.g., account administration fees) do not constitute a conflict of interest.

reversals in a manner mandated in programme procedures; require activity proponents, upon being made aware of a material reversal event, to notify the programme within a specified number of days; and confer responsibility to the programme to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in programme procedures.

3.5.6. *Replacement unit eligibility*: The programme should 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.

3.5.7. *Review of compensation measure performance*: In the case that ICAO designates the programme as eligible, including activity type(s) supported by the programme which require that a compensation measure is in place, the programme should be willing and able to demonstrate to ICAO that the measure can fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA as of the date of review.

3.6. *Eligibility Criterion*: A system must have measures in place to assess and mitigate incidences of material leakage—Offset credits should be generated from projects that do not cause emissions to materially increase elsewhere (this concept is also known as leakage). Offset credit programmes should have an established process for assessing and mitigating leakage of emissions that may result from the implementation of an offset project or programme.

3.6.1. Guidelines for interpretation of the "Assess and mitigate material leakage" criterion

3.6.2. *Scope and leakage prevention*: Programmes should have provisions in place requiring that activities that pose a risk of leakage when implemented at the project-level should be implemented at a national level, or on an interim basis on a subnational level, in order to mitigate the risk of leakage.

3.6.3. *Leakage monitoring*: The programme should have procedures in place requiring and supporting activities to monitor identified leakage.

3.6.4. *Leakage compensation*: The programme should have procedures in place for the activities it supports to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities.

3.7. *Eligibility Criterion*: Are only counted once towards a mitigation obligation—Measures must be in place to avoid:

3.7.1. *Double issuance* (which occurs if more than one unit is issued for the same emissions or emissions reduction).

3.7.2. *Double use* (which occurs when the same issued unit is used twice, for example, if a unit is duplicated in registries).

3.7.3. *Double claiming* (which occurs if the same emissions reduction is counted twice by both the buyer and the seller (i.e., counted towards the climate change mitigation effort of both an airline and the host country of the emissions reduction activity)). In

order to prevent double claiming, eligible programmes should 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.

3.7.4. Guidelines for interpretation of the "Only counted once towards a mitigation obligation" criterion

3.7.5. *Double-issuance*: The programme should have procedures in place for programme and/or registry administrator monitoring of programme registry(ies) to ensure the transparent transfer of units between registries; and that only one unit is issued for one tonne of mitigation.

3.7.6. *Double-use*: The programme should have procedures in place for programme and/or registry administrator monitoring of programme registry(ies) to ensure that one unit is issued or transferred to, or owned or cancelled by, only one entity at any given time.

3.7.7. *Double-selling*: Programmes should have procedures in place to discourage and prohibit the double-selling of units. Double selling occurs when one or more entities sell the same unit more than once.

3.7.8. *Host country attestation to the avoidance of double-claiming*: Only emissions units originating in countries that have attested to their intention to properly account for the use of the units toward offsetting obligations under the CORSIA, as specified in paragraph (and sub-paragraphs of) 3.7.9, should be eligible for use in the CORSIA. The programme should 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. [7] The attestation should 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). Host country attestations should be obtained and made publicly available prior to the use of units from the host country in the CORSIA.

3.7.9. *Double-claiming procedures*: The programme should have procedures in place requiring that activities take approach(es) described in these sub-paragraphs to prevent double-claiming, which attestations should confirm:

3.7.9.1. Emissions units are created where mitigation is not also counted toward national target(s) / pledge(s) / mitigation contributions / mitigation commitments.

3.7.9.2. 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.

[7] Agency responsible for a host country's national emissions inventory reporting ("National Focal Point"); including under the Paris Agreement.

3.7.9.3. If programme procedures provide for the use of method(s) to avoid double-claiming which are not listed above, the GMTF, or other appropriate technical expert body, should evaluate and make a recommendation regarding the sufficiency of the approach prior to any final determination of the programme's eligibility.

3.7.10. *Transparent communications*: The programme 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.

3.7.11. *Comparing unit use against national reporting*: The programme 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 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.

3.7.12. *Programme reporting on performance*: The programme should be prepared 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 number, scale, and/or scope of host country attestations; any relevant changes to related programme measures.

3.7.13. *Reconciliation of double-claimed mitigation*: The programme should 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.

3.8. *Eligibility Criterion*: Carbon offset credits must represent emissions reductions, avoidance, or carbon sequestration from projects that do no net harm—Offset projects should not violate local, State/provincial, national or international regulations or obligations. Offset programmes should show how they comply with social and environmental safeguards and should publicly disclose which institutions, processes, and procedures are used to implement, monitor, and enforce safeguards to identify, assess and manage environmental and social risks.

Programme Re-application Form, Appendix B

Programme Assessment Scope

CONTENTS: List all activities and methodologies/protocols that were assessed by TAB at the time of the previous programme's application or are currently within the Scope of Eligibility in the pilot phase. Programmes may define additional activities and methodologies/protocols programmes for TAB's assessment for the **CORSIA first phase**.

Sheet A) Activities previously assessed by TAB at the time of the previous programme's application or those within the Scope of Eligibility in the pilot phase

Sheet B) List of all methodologies / protocols that support activities described under Sheet A

Sheet C) Activities that were not previously-assessed or excluded for assessment by TAB at the time of the previos application and that programmes wish to add for TAB's assessment for the first ph

Sheet D) List of all methodologies / protocols that support activities described under Sheet C

as

SHEET A: APPROVED ACTIVITIES *(Here, list activities supported by the programme that were previously-assessed by TAB at the time of the previous application or those within the Scope of Eligibility in the pilot phase)*

Sector	Supported activity type(s)	Implementation level(s)	Geography(ies)
Energy industries (renewable-/non-renewable sources)	Renewable energy (e.g., wind, solar, geothermal, and hydroelectric electricity generation)/Non-renewable energy (e.g., natural gas electricity generation)	Project level	Global
Energy distribution	Energy distribution activities (e.g., fuel switch (fossil fuel to biomass), waste energy recovery and use, and electrification of new communities)	Project level	Global
Energy demand	Energy efficiency measures (e.g., in lighting, thermal applications, weatherization of buildings, fuel switch, jet engine washing, and mechanical/waste energy use)	Project level	Global
Manufacturing industries	Emission reduction activities in manufacturing activities (e.g., energy effiiency in industrial facilities, fuel switch in cement production, waste energy recovery and utilization)	Project level	Global
Chemical industries	Emission reduction activities in chemical production (e.g., reduction of N2O in nitric acid production, soda recovery in paper manufacturing, and emission reductions in propylene oxide production)	Project level	Global
Construction	Emission reduction activities related to construction (e.g., brick and cement manufacture)	Project level	Global
Transport	Emission reduction activities related to transportation (e.g., use of electric or hybrid vehicles, mass rapid transit, carpooling, and fuel switch from gasoline to ethanol)	Project level	Global
Mining/mineral production	Coal mine methane capture and destruction/utilization	Project level	Global
Metal production	Emission reduction activities related to metal production (e.g., efficiency measures in aluminum smelting)	Project level	Global
Fugitive emissions from fuels (solid, oil and gas)	Emission reduction activities from capture and/or use of fugitive emissions (e.g., methane recovery from manure management, recovery and utilization of landfill gas, and recovery and utilization of coal mine methane)	Project level	Global
Fugitive emissions from production and consumption of halocarbons and sulphur hexafluoride	Emission reduction activities related to fugitive emissions from industrial gases (e.g., from SF6)*	Project level	Global
Solvent use	Emission reduction activities related to use of solvents	Project level	Global
Waste handling and disposal	Emission reduction activities related to waste (e.g., landfill methane capture and destruction and/or utilization, waste water treatment, and energy production from waste biomass)	Project level	Global
Afforestation and reforestation	Carbon sequestration/emissions reduction activities related to afforestation/Reforestation	Project level	Global
Agriculture	Carbon sequestration/emissions reduction activities related to agriculture (e.g. soil tillage improvement)	Project level	Global
Carbon Capture and Storage/Carbon Removal	Carbon capture and storage -reduction of anthropogenic CO2 emissions into the atmosphere. CO2 is captured at large stationary sources and is injected into the deep subsurface for long-time storage/Carbon Removal-intentional efforts to remove carbon dioxide from the atmosphere, including land management strategies, accelerated weathering, ocean iron fertilization, biomass energy with carbon capture and sequestration (BECCS), and direct air capture and sequestration (DACS).	Project level	Global

SHEET B: APPROVED 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
Flaring or use of landfill gas	ACM0001	V 19	2019-06-14	N/A	CO2, CH4	
Grid-connected electricity generation from renewable sources	ACM0002	V 21	2022-11-02	N/A	CO2	
Partial substitution of fossil fuels in cement or quicklime manufacture	ACM0003	V 9	2020-12-14	N/A	CO2, CH4	
Increasing the blend in cement production	ACM0005	V 7.1.0	2012-03-02	N/A	CO2	
Electricity and heat generation from biomass	ACM0006	V 16	2022-03-11	N/A	CO2, CH4	
Conversion from single cycle to combined cycle power generation	ACM0007	V 6.1	2012-11-05	N/A	CO2	
Abatement of methane from coal mines	ACM0008	V 8	2014-02-21	N/A	CH4, CO2	
Fuel switching from coal or petroleum fuel to natural gas	ACM0009	V 5	2014-11-28	N/A	CO2	
GHG emission reductions from manure management systems	ACM0010	V 8	2013-04-10	N/A	CO2, CH4, N2O	
Fuel switching from coal and/or petroleum fuels to natural gas in existing power plants for electricity generation	ACM0011	V 3	2014-11-28	N/A	CO2	
Waste energy recovery	ACM0012	V 6	2015-11-27	N/A	CO2	
Construction and operation of new grid connected fossil fuel fired power plants using a less GHG intensive technology	ACM0013	V 5	2012-09-13	N/A	CO2	
Treatment of wastewater	ACM0014	V 8	2019-06-14	N/A	CO2	
Emission reductions from raw material switch in clinker production	ACM0015	V 4	2014-01-06	N/A	CO2	
Mass Rapid Transit Projects	ACM0016	V 5	2021-05-27	N/A	CO2, CH4	
Production of biodiesel	ACM0017	V 4	2022-03-11	N/A	CO2	
Electricity generation from biomass in power-only plants	ACM0018	V 6	2022-03-11	N/A	CO2, CH4	
N2O abatement from nitric acid production	ACM0019	V 4	2018-11-29	N/A	N2O	
Co-firing of biomass residues for heat generation and/or electricity generation in grid connected power plants	ACM0020	V 1	2011-09-29	N/A	CO2	
Reduction of emissions from charcoal production by improved kiln design and/or abatement of methane	ACM0021	V 1	2012-05-11	N/A	CH4	
Alternative waste treatment processes	ACM0022	V 3	2021-09-09	N/A	CO2, CH4	
Introduction of an efficiency improvement technology in a boiler	ACM0023	V 1	2013-04-10	N/A	CO2	
Natural gas substitution by biogenic methane produced from the anaerobic digestion of organic waste	ACM0024	V 1	2014-02-21	N/A	CO2	
Construction of a new natural gas power plant	ACM0025	V 2	2016-07-22	N/A	CO2	
Fossil fuel based cogeneration for identified recipient facility(ies)	ACM0026	V 2	2016-11-04	N/A	CO2	
Decomposition of fluoroform (HFC-23) waste streams	AM0001	V 6	2011-11-25	N/A	HCF	
Analysis of the least-cost fuel option for seasonally-operating biomass cogeneration plants	AM0007	V 1	2014-06-13	N/A	CO2	
Recovery and utilization of gas from oil fields that would otherwise be flared or vented	AM0009	V 7	2013-11-08	N/A	CO2	
Steam system efficiency improvements by replacing steam traps and returning condensate	AM0017	V 2	2005-06-21	N/A	CO2	
Baseline methodology for steam optimization systems	AM0018	V 4	2016-07-22	N/A	CO2	
Renewable energy projects replacing part of the electricity production of one single fossil fuel fired power plant that stands alone or supplies to a grid, excluding biomass projects	AM0019	V 2	2006-05-18	N/A	CO2, CH4	
Baseline methodology for water pumping efficiency improvements	AM0020	V 2	2007-02-11	N/A	CO2	
Baseline Methodology for decomposition of N2O from existing adipic acid production plants	AM0021	V 3	2009-02-27	N/A	CO2, N2O	
Leak detection and repair in gas production, processing, transmission, storage and distribution systems and in refinery facilities	AM0023	V 4	2011-09-29	N/A	CH4	
Methodology for zero-emissions grid-connected electricity generation from renewable sources in Chile or in countries with merit order based dispatch grid	AM0026	V 3	2007-02-11	N/A	CO2, CH4	
Substitution of CO2 from fossil or mineral origin by CO2 from renewable sources in the production of inorganic compounds	AM0027	V 3	2021-09-09	N/A	CO2	
N2O destruction in the tail gas of Caprolactam production plants	AM0028	V 6	2013-05-31	N/A	CO2, CH4, N2O	
PFC emission reductions from anode effect mitigation at primary aluminium smelting facilities	AM0030	V 4	2012-05-11	N/A	CF4, C2F6	
Bus rapid transit projects	AM0031	V 8	2021-05-27	N/A	CO2, CH4	
SF6 emission reductions in electrical grids	AM0035	V 2	2012-11-23	N/A	SF6	
Use of biomass in heat generation equipment	AM0036	V 7	2022-03-11	N/A	CO2, CH4	
Flare (or vent) reduction and utilization of gas from oil wells as a feedstock	AM0037	v 3	2016-07-22	N/A	CO2, CH4	
Methodology for improved electrical energy efficiency of an existing submerged electric arc furnace used for the production of silicon and ferro alloys	AM0038	V 3	2011-03-06	N/A	CO2	
Leak reduction from a natural gas distribution grid by replacing old cast iron pipes or steel pipes without cathodic protection with polyethylene pipes	AM0043	V 2	2007-11-02	N/A	CH4	
Energy efficiency improvement projects - boiler rehabilitation or replacement in industrial and district heating sectors	AM0044	V 2	2012-11-23	N/A	CO2	
Grid connection of isolated electricity systems	AM0045	V 3	2016-07-22	N/A	CO2	
Distribution of efficient light bulbs to households	AM0046	V 2	2007-02-11	N/A	CO2	
New cogeneration project activities supplying electricity and heat to multiple costumers	AM0048	V 5	2016-04-11	N/A	CO2	
Methodology for gas based energy generation in an industrial facility	AM0049	V 3	2009-02-27	N/A	CO2	
Feed switch in integrated Ammonia-urea manufacturing industry	AM0050	V 3	2012-07-20	N/A	CO2	
Increased electricity generation from existing hydropower stations through Decision Support System optimization	AM0052	V 3	2016-07-22	N/A	CO2	
Biogenic methane injection to a natural gas distribution grid	AM0053	V 4	2012-09-13	N/A	CO2	
Recovery and utilization of waste gas in refinery or gas plant	AM0055	V 2.1	2011-06-13	N/A	CO2	
Efficiency improvement by boiler replacement or rehabilitation and optional fuel switch in fossil fuel-fired steam boiler systems	AM0056	V 1	2007-07-26	N/A	CO2	

Avoided emissions from biomass wastes through use as feed stock in pulp and paper, cardboard, fibreboard or bio-oil production	AM0057	V 3.0.1	2010-09-13	N/A	CH4
Introduction of a new primary district heating system	AM0058	V 5	2016-07-22	N/A	CO2
Reduction in GHGs emission from primary aluminium smelters	AM0059	V 2	2016-07-22	N/A	CF4, C2F6
Power saving through replacement by energy efficient chillers	AM0060	V 2	2016-07-22	N/A	CO2
Methodology for rehabilitation and/or energy efficiency improvement in existing power plants	AM0061	V 2.1	2008-05-30	N/A	CO2
Energy efficiency improvements of a power plant through retrofitting turbines	AM0062	V 2	2010-08-30	N/A	CO2
Recovery of CO2 from tail gas in industrial facilities to substitute the use of fossil fuels for production of CO2	AM0063	V 1.2.0	2007-11-22	N/A	CO2
Capture and utilisation or destruction of mine methane (excluding coal mines) or non mine methane	AM0064	V 3	2012-03-02	N/A	CO2, CH4
Replacement of SF6 with alternate cover gas in the magnesium industry	AM0065	V 2.1	2008-08-16	N/A	SF6
GHG emission reductions through waste heat utilisation for pre-heating of raw materials in sponge iron manufacturing process	AM0066	V 2	2008-05-12	N/A	CO2
Methodology for installation of energy efficient transformers in a power distribution grid	AM0067	V 2	2008-08-16	N/A	CO2
Methodology for improved energy efficiency by modifying ferroalloy production facility	AM0068	V 1	2008-05-15	N/A	CO2
Biogenic methane use as feedstock and fuel for town gas production	AM0069	V 2	2009-12-18	N/A	CO2
Manufacturing of energy efficient domestic refrigerators	AM0070	V 3.1.0	2010-08-04	N/A	CO2
Manufacturing and servicing of domestic refrigeration appliances using a low GWP refrigerant	AM0071	V 3	2022-09-08	N/A	HFC
Fossil Fuel Displacement by Geothermal Resources for Space Heating	AM0072	V 3	2013-05-31	N/A	CO2
GHG emission reductions through multi-site manure collection and treatment in a central plant	AM0073	V 1	2008-11-27	N/A	CO2
Methodology for new grid connected power plants using permeate gas previously flared and/or vented	AM0074	V 3	2012-05-11	N/A	CO2
Methodology for collection, processing and supply of biogas to end-users for production of heat	AM0075	V 1	2009-12-02	N/A	CO2
Implementation of fossil fuel trigeneration systems in existing industrial facilities	AM0076	V 2	2015-07-24	N/A	CO2
Recovery of gas from oil wells that would otherwise be vented or flared and its delivery to specific end-users	AM0077	V 1	2009-02-12	N/A	CO2
Point of Use Abatement Device to Reduce SF6 emissions in LCD Manufacturing Operations	AM0078	V 2	2012-03-02	N/A	SF6
Recovery of SF6 from Gas insulated electrical equipment in testing facilities	AM0079	V 2	2009-12-18	N/A	SF6
Mitigation of greenhouse gases emissions with treatment of wastewater in aerobic wastewater treatment plants	AM0080	V 1	2009-05-27	N/A	CO2
Flare or vent reduction at coke plants through the conversion of their waste gas into dimethyl ether for use as a fuel	AM0081	V 1	2009-05-27	N/A	CO2
Use of charcoal from planted renewable biomass in a new iron ore reduction system	AM0082	V 2	2018-11-29	N/A	CO2, CH4, N2O
Avoidance of landfill gas emissions by in-situ aeration of landfills	AM0083	V 1.0.1	2009-07-16	N/A	CO2
Installation of cogeneration system supplying electricity and chilled water to new and existing consumers	AM0084	V 3	2015-07-24	N/A	CO2
Distribution of low greenhouse gas emitting water purification systems for safe drinking water	AM0086	V 5	2019-03-28	N/A	CO2
Air separation using cryogenic energy recovered from the vaporization of LNG	AM0088	V 1	2010-07-29	N/A	CO2
Production of diesel using a mixed feedstock of gasoil and vegetable oil	AM0089	V 3	2022-03-11	N/A	CO2
Modal shift in transportation of cargo from road transportation to water or rail transportation	AM0090	V 1.1.0	2010-09-17	N/A	CO2
Energy efficiency technologies and fuel switching in new buildings	AM0091	V 4	2018-11-29	N/A	CO2, CH4
Substitution of PFC gases for cleaning Chemical Vapour Deposition (CVD) reactors in the semiconductor industry	AM0092	V 2	2012-11-23	N/A	C2F6, CF4
Avoidance of landfill gas emissions by passive aeration of landfills	AM0093	V 1.0.1	2011-07-15	N/A	CH4
Distribution of biomass based stove and/or heater for household or institutional use	AM0094	V 2.0	2012-11-23	N/A	CO2
Waste gas based combined cycle power plant in a Greenfield iron and steel plant	AM0095	V 1	2011-09-29	N/A	CO2
CF4 emission reduction from installation of an abatement system in a semiconductor manufacturing facility	AM0096	V 1	2011-09-29	N/A	CF4
Installation of high voltage direct current power transmission line	AM0097	V 1	2011-09-29	N/A	CO2
Utilization of ammonia-plant off gas for steam generation	AM0098	V 1	2011-09-29	N/A	CO2, CH4
Installation of a new natural gas fired gas turbine to an existing CHP plant	AM0099	V 1	2011-11-25	N/A	CO2
Integrated Solar Combined Cycle (ISCC) projects	AM0100	V 1	2011-11-25	N/A	CO2
High speed passenger rail systems	AM0101	V 2	2015-07-24	N/A	CO2, CH4
Renewable energy power generation in isolated grids	AM0103	V 4	2019-11-28	N/A	CO2
Interconnection of electricity grids in countries with economic merit order dispatch	AM0104	V 2	2012-11-23	N/A	CO2
Energy efficiency in data centres through dynamic power management	AM0105	V 1	2012-07-20	N/A	CO2
Energy efficiency improvements of a lime production facility through installation of new kilns	AM0106	V 2	2012-09-13	N/A	CO2
New natural gas based cogeneration plant	AM0107	V 4	2016-11-04	N/A	CO2
Interconnection between electricity systems for energy exchange	AM0108	V 1	2012-09-13	N/A	CO2
Introduction of hot supply of Direct Reduced Iron in Electric Arc Furnaces	AM0109	V 1	2012-09-13	N/A	CO2
Modal shift in transportation of liquid fuels	AM0110	V 2	2015-04-16	N/A	CO2
Abatement of fluorinated greenhouse gases in semiconductor manufacturing	AM0111	V 1	2012-11-23	N/A□3F, CH2F2, C3F8, c-C4F8, SF6	
Less carbon intensive power generation through continuous reductive distillation of waste	AM0112	V 1	2013-10-04	N/A	CO2, CH4
Distribution of compact fluorescent lamps (CFL) and light-emitting diode (LED) lamps to households	AM0113	V 2	2022-09-08	N/A	CO2

Shift from electrolytic to catalytic process for recycling of chlorine from hydrogen chloride gas in isocyanate plants	AM0114	V 1	2014-01-07	N/A	CO2
Recovery and utilization of coke oven gas from coke plants for LNG production	AM0115	V 1	2014-11-28	N/A	CO2, CH4
Electric taxiing systems for airplanes	AM0116	V 2	2016-05-13	N/A	CO2
Introduction of a new district cooling system	AM0117	V 2	2019-06-14	N/A	CO2
Introduction of low resistivity power transmission line	AM0118	V 2	2017-11-01	N/A	CO2
SF6 emission reductions in gas insulated metal enclosed switchgear	AM0119	V 1	2017-05-04	N/A	SF6
Energy-efficient refrigerators and air-conditioners	AM0120	V 1	2017-11-01	N/A	HFC
Emission reduction from partial switching of raw materials and increasing the share of additives in the production of blended cement	AM0121	V 1	2020-10-05	N/A	CO2
Recovery of methane-rich vapours from hydrocarbon storage tanks	AM0122	V 2	2022-09-08	N/A	CO2, CH4
Electricity generation by the user	AMS-I.A.	V 19	2022-09-08	N/A	CO2
Mechanical energy for the user with or without electrical energy	AMS-I.B.	V 13	2022-09-08	N/A	CO2
Thermal energy production with or without electricity	AMS-I.C.	V 22	2022-03-11	N/A	CO2
Grid connected renewable electricity generation	AMS-I.D.	V 18	2014-11-28	N/A	CO2
Switch from non-renewable biomass for thermal applications by the user	AMS-I.E.	V 13	2022-09-08		
Renewable electricity generation for captive use and mini-grid	AMS-I.F.	V 5	2022-09-08	N/A	CO2
Plant oil production and use for energy generation in stationary applications	AMS-I.G.	V 2	2014-11-28	N/A	CO2
Biodiesel production and use for energy generation in stationary applications	AMS-I.H.	V 3	2018-01-03	N/A	CO2
Biogas/biomass thermal applications for households/small users	AMS-I.I.	V 6	2022-03-11	N/A	CO2
Solar water heating systems (SWH)	AMS-I.J.	V 2	2018-08-31	N/A	CO2
Solar cookers for households	AMS-I.K.	V 1	2012-02-03	N/A	CO2
Electrification of rural communities using renewable energy	AMS-I.L.	V 4	2022-09-08	N/A	CO2
Solar power for domestic aircraft at-gate operations	AMS-I.M	V 1	2016-05-13	N/A	CO2
Supply side energy efficiency improvements – transmission and distribution	AMS-II.A.	V 10	2009-07-31	N/A	CO2
Supply side energy efficiency improvements – generation	AMS-II.B.	V 9	2007-10-09	N/A	CO2
Demand-side energy efficiency activities for specific technologies	AMS-II.C.	V 15	2016-05-13	N/A	CO2
Energy efficiency and fuel switching measures for industrial facilities	AMS-II.D.	V 13	2013-04-10	N/A	CO2
Energy efficiency and fuel switching measures for buildings	AMS-II.E.	V 12	2020-10-05	N/A	CO2, CH4
Energy efficiency and fuel switching measures for agricultural facilities and activities	AMS-II.F.	V 10	2012-03-16	N/A	CO2
Energy efficiency measures in thermal applications of non-renewable biomass	AMS-II.G.	V 13	2022-09-08	N/A	CO2
Energy efficiency measures through centralization of utility provisions of an industrial facility	AMS-II.H.	V 3	2011-04-29	N/A	CO2
Efficient utilization of waste energy in industrial facilities	AMS-II.I.	V 1	2008-05-16	N/A	CO2
Demand-side activities for efficient lighting technologies	AMS-II.J.	V 7	2016-05-13	N/A	CO2
Installation of co-generation or tri-generation systems supplying energy to commercial building	AMS-II.K.	V 2	2012-05-25	N/A	CO2
Demand-side activities for efficient outdoor and street lighting technologies	AMS-II.L.	V 2	2013-04-10	N/A	CO2
Demand-side energy efficiency activities for installation of low-flow hot water savings devices	AMS-II.M.	V 2	2013-04-10	N/A	CO2
Demand-side energy efficiency activities for installation of energy efficient lighting and/or controls in buildings	AMS-II.N.	V 2	2013-04-10	N/A	CO2
Dissemination of energy efficient household appliances	AMS-II.O.	V 1	2012-02-03	N/A	CO2
Energy efficient pump-set for agriculture use	AMS-II.P.	V 1	2012-07-20	N/A	CO2
Energy efficiency and/or energy supply projects in commercial buildings	AMS-II.Q.	V 1	2012-07-20	N/A	CO2
Energy efficiency space heating measures for residential buildings	AMS-II.R.	V 1	2013-05-31	N/A	CO2
Energy efficiency in motor systems	AMS-II.S.	V 1	2014-11-28	N/A	CO2
Emission reduction through reactive power compensation in power distribution network	AMS-II.T	V 2	2019-03-28	N/A	CO2,
Offsetting of synthetic nitrogen fertilizers by inoculant application in legumes-grass rotations on acidic soils on existing cropland	AMS-III.A.	V 3	2014-11-28	N/A	CO2
Transportation Energy Efficiency Activities using Retrofit Technologies	AMS-III.AA.	V 1	2009-05-28	N/A	CO2
Avoidance of HFC emissions in Standalone Commercial Refrigeration Cabinets	AMS-III.AB.	V 1	2009-05-28	N/A	HCF
Electricity and/or heat generation using fuel cell	AMS-III.AC.	V 1	2009-05-28	N/A	CO2
Emission reductions in hydraulic lime production	AMS-III.AD.	V 1	2009-05-28	N/A	CO2
Energy efficiency and renewable energy measures in new residential buildings	AMS-III.AE.	V 2	2018-11-29	N/A	CO2
Avoidance of methane emissions through excavating and composting of partially decayed municipal solid waste (MSW)	AMS-III.AF.	V 1	2009-10-16	N/A	CH4
Switching from high carbon intensive grid electricity to low carbon intensive fossil fuel	AMS-III.AG.	V 3	2015-07-24	N/A	CO2
Shift from high carbon intensive fuel mix ratio to low carbon-intensive fuel mix ratio	AMS-III.AH.	V 3	2017-04-05	N/A	CO2
Emission reductions through recovery of spent sulphuric acid	AMS-III.AI.	V 1	2010-03-25	N/A	CO2
Recovery and recycling of materials from solid wastes	AMS-III.AJ.	V 9	2022-09-08	N/A	CO2, CH4
Biodiesel production and use for transport applications	AMS-III.AK.	V 3	2018-01-03	N/A	CO2
Conversion from single cycle to combined cycle power generation	AMS-III.AL.	V 1	2010-07-29	N/A	CO2
Fossil fuel switch in a cogeneration/trigeneration system	AMS-III.AM.	V 2	2011-03-04	N/A	CO2
Fossil fuel switch in existing manufacturing industries	AMS-III.AN.	V 2	2011-03-04	N/A	CO2
Methane recovery through controlled anaerobic digestion	AMS-III.AO.	V 1	2010-11-26	N/A	CH4
Transport energy efficiency activities using post - fit Idling Stop device	AMS-III.AP.	V 2	2011-04-03	N/A	CO2
Introduction of Bio-CNG in transportation applications	AMS-III.AQ.	V 2	2011-04-03	N/A	CO2

Substituting fossil fuel based lighting with LED/CFL lighting systems	AMS-III.AR.	V 8	2022-09-08	N/A	CO2
Switch from fossil fuel to biomass in existing manufacturing facilities for non-energy applications	AMS-III.AS.	V 2	2014-11-28	N/A	CO2
Transportation energy efficiency activities installing digital tachograph systems to commercial freight transport fleets	AMS-III.AT.	V 2	2012-03-16	N/A	CO2
Methane emission reduction by adjusted water management practice in rice cultivation	AMS-III.AU.	V 4	2014-11-28	N/A	CO2, CH4
Low greenhouse gas emitting safe drinking water production systems	AMS-III.AV.	V 8	2020-06-12	N/A	CO2
Electrification of rural communities by grid extension	AMS-III.AW.	V 2	2022-09-08	N/A	CO2
Methane oxidation layer (MOL) for solid waste disposal sites	AMS-III.AX.	V 1	2011-11-25	N/A	CO2, CH4
Introduction of LNG buses to existing and new bus routes	AMS-III.AY.	V 2	2022-09-08	N/A	CO2
Switching fossil fuels	AMS-III.B.	V 18	2015-04-16	N/A	CO2
Recovery and recycling of materials from E-waste	AMS-III.BA.	V 3	2021-09-09	N/A	CO2
Electrification of communities through grid extension or construction of new mini-grids	AMS-III.BB.	V 3	2022-09-08	N/A	CO2
Emission reductions through improved efficiency of vehicle fleets	AMS-III.BC.	V 3	2022-09-08	N/A	CO2
GHG emission reduction due to supply of molten metal instead of ingots for aluminium castings	AMS-III.BD.	V 1	2012-07-20	N/A	CO2
Avoidance of methane and nitrous oxide emissions from sugarcane pre-harvest open burning through mulching	AMS-III.BE.	V 1	2012-11-23	N/A	CH4, N2O
Reduction of N2O emissions from use of Nitrogen Use Efficient (NUE) seeds that require less fertilizer application	AMS-III.BF.	V 2	2014-11-28	N/A	N2O
Emission reduction through sustainable charcoal production and consumption	AMS-III.BG.	V 4	2022-09-08	N/A	CH4, CO2
Displacement of production of brick and cement by manufacture and installation of gypsum concrete wall panels	AMS-III.BH.	V 1	2013-10-14	N/A	CO2
Flare gas recovery in gas treating facilities	AMS-III.BI.	V 1	2013-10-04	N/A	CO2
Destruction of hazardous waste using plasma technology including energy recovery	AMS-III.BJ.	V 1	2013-10-04	N/A	CO2,
Strategic feed supplementation in smallholder dairy sector to increase productivity	AMS-III.BK.	V 2	2021-10-29	N/A	CH4, CO2
Integrated methodology for electrification of communities	AMS-III.BL.	V 2	2022-09-08	N/A	CO2
Lightweight two and three wheeled personal transportation	AMS-III.BM.	V 2	2022-09-08	N/A	CO2
Efficient operation of public transportation	AMS-III.BN.	V 1	2019-03-28	N/A	CO2
Trip avoidance through equipment improvement of freight transport	AMS-III.BO.	V 1	2019-09-12	N/A	CO2
Emission reduction by shore-side electricity supply system	AMS-III.BP.	V 1	2020-06-12	N/A	CO2
Emission reductions by electric and hybrid vehicles	AMS-III.C.	V 16	2022-09-08	N/A	CO2
Methane recovery in animal manure management systems	AMS-III.D.	V 21	2017-09-22	N/A	CH4
Avoidance of methane production from decay of biomass through controlled combustion, gasification or mechanical/thermal treatment	AMS-III.E.	V 17	2014-11-28	N/A	CH4
Avoidance of methane emissions through composting	AMS-III.F.	V 12	2016-04-11	N/A	CH4
Landfill methane recovery	AMS-III.G.	V 10	2019-06-14	N/A	CH4
Methane recovery in wastewater treatment	AMS-III.H.	V 18	2015-10-16	N/A	CH4
Avoidance of methane production in wastewater treatment through replacement of anaerobic systems by aerobic systems	AMS-III.I.	V 8	2009-07-31	N/A	CH4
Avoidance of fossil fuel combustion for carbon dioxide production to be used as raw material for industrial processes	AMS-III.J.	V 3	2007-10-09	N/A	CO2
Avoidance of methane release from charcoal production	AMS-III.K.	V 5	2011-09-12	N/A	CH4
Avoidance of methane production from biomass decay through controlled pyrolysis	AMS-III.L.	V 2	2007-10-09	N/A	CH4
Reduction in consumption of electricity by recovering soda from paper manufacturing process	AMS-III.M.	V 2	2007-10-09	N/A	CO2
Avoidance of HFC emissions in rigid Poly Urethane Foam (PUF) manufacturing	AMS-III.N.	V 3	2009-04-08	N/A	HFC
Hydrogen production using methane extracted from biogas	AMS-III.O.	V 2	2015-07-24	N/A	CO2
Recovery and utilization of waste gas in refinery facilities	AMS-III.P.	V 1	2007-10-19	N/A	CO2
Waste energy recovery	AMS-III.Q.	V 6.1	2015-04-16	N/A	CO2
Methane recovery from livestock and manure management at households and small farms	AMS-III.R.	V 5	2023-03-24		
Introduction of low-emission vehicles/technologies to commercial vehicle fleets	AMS-III.S.	V 4	2012-07-12	N/A	CO2
Plant oil production and use for transport applications	AMS-III.T.	V 3	2014-11-28	N/A	CO2
Cable Cars for Mass Rapid Transit System (MRTS)	AMS-III.U.	V 2	2015-07-24	N/A	CO2
Decrease of coke consumption in blast furnace by installing dust/sludge recycling system in steel works	AMS-III.V.	V 1	2008-09-26	N/A	CO2
Methane capture and destruction in non-hydrocarbon mining activities	AMS-III.W.	V 2	2011-12-09	N/A	CO2, CH4
Energy Efficiency and HFC-134a Recovery in Residential Refrigerators	AMS-III.X.	V 2	2010-10-01	N/A	HFC, CO2
Methane avoidance through separation of solids from wastewater or manure treatment systems	AMS-III.Y.	V 4	2016-04-11	N/A	CH4
Fuel Switch, process improvement and energy efficiency in brick manufacture	AMS-III.Z.	V 6	2015-07-24	N/A	CO2, CH4, N2O
Afforestation and reforestation of degraded mangrove habitats	AR-AM0014	V 3	2013-10-04	N/A	CO2, CH4, N2O
Afforestation and reforestation of lands except wetlands	AR-ACM0003	V 2	2013-10-04	N/A	CO2, CH4, N2O
Afforestation and reforestation project activities implemented on wetlands	AR-AMS0003	V 3	2013-10-04	N/A	CO2, CH4, N2O
Afforestation and reforestation project activities implemented on lands other than wetlands	AR-AMS0007	V 3.1.0	2013-10-04	N/A	CO2, CH4, N2O
Greenhouse gases - Part 2: Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements	ISO 14064-2:2019	2019	2019-05-01	N/A	All

SHEET C: ADDITIONAL ACTIVITIES *(Here, list activities supported by the programme that were not previously-assessed by TAB at the time of the previous application and that programmes wish to add for assessment for the first phase)*

Sector	Supported activity type(s)	Implementation level(s)	Geography(ies)

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

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
Renewable energy generation for captive use	AM123	1	2023-09-27		CO2	
Hydrogen production from electrolysis of water	AM124	1	2023-09-27		CO2	
Hydrogen fuel cell vehicles	AMS-III.BQ.	1	2023-03-24		CO2	

Programme Re-application Form, Appendix C

Programme Exclusions Scope

CONTENTS: List all activities and methodologies/protocols that were excluded from the previous TAB's assessment or outside of Scope of Eligibility in the pilot phase. Programmes may define additional activities and methodologies/protocols programmes to be **excluded** from TAB's assessment for the **CORSIA first phase**. The four sheets are described below:

Sheet A) Activities that were e**xcluded** from TAB's assessment at the time of theprevious programme's application, or outside of programme's Scope of Eligibility in the pilot phase

Sheet B) List of all methodologies / protocols that support activities described under Sheet A

Sheet C) Additional activities that the programme wish to **exclude** from TAB's assessment

Sheet D) List of all methodologies / protocols that support activities described under Sheet C

SHEET A: EXCLUDED ACTIVITIES *(Here, list activities that were **excluded** from TAB's assessment at the time of the previous programme's application, or is outside of programme's Scope of Eligibility in the pilot phase)*

Sector	Project/programme type(s)	Implementation level(s)	Geography(ies)
Energy industries (renewable-/non-renewable sources)	Ex-ante issuance of renewable energy (e.g., wind, solar, geothermal, and hydroelectric electricity generation)/Non-renewable energy (e.g., natural gas electricity generation)	Project-level and grouped projects	Global
Energy distribution	Ex-ante issuance of energy distribution activities (e.g., fuel switch (fossil fuel to biomass), waste energy recovery and use, and electrification of new communities)	Project-level and grouped projects	Global
Energy demand	Ex-ante issuance of energy efficiency measures (e.g., in lighting, thermal applications, weatherization of buildings, fuel switch, jet engine washing, and mechanical/waste energy use)	Project-level and grouped projects	Global
Manufacturing industries	Ex-ante issuance of emission reduction activities in manufacturing activities (e.g., energy effiiency in industrial facilities, fuel switch in cement production, waste energy recovery and utilization)	Project-level and grouped projects	Global
Chemical industries	Ex-ante issuance of emission reduction activities in chemical production (e.g., reduction of N2O in nitric acid production, soda recovery in paper manufacturing, and emission reductions in propylene oxide production)	Project-level and grouped projects	Global
Construction	Ex-ante issuance of emission reduction activities related to construction (e.g., brick and cement manufacture)	Project-level and grouped projects	Global
Transport	Ex-ante issuance of emission reduction activities related to transportation (e.g., use of electric or hybrid vehicles, mass rapid transit, carpooling, and fuel switch from gasoline to ethanol)	Project-level and grouped projects	Global
Mining/mineral production	Ex-ante issuance of coal mine methane capture and destruction/utilization	Project-level and grouped projects	Global
Metal production	Ex-ante issuance of emission reduction activities related to metal production (e.g., efficiency measures in aluminum smelting)	Project-level and grouped projects	Global
Fugitive emissions from fuels (solid, oil and gas)	Ex-ante issuance of emission reduction activities from capture and/or use of fugitive emissions (e.g., methane recovery from manure management, recovery and utilization of landfill gas, and recovery and utilization of coal mine methane)	Project-level and grouped projects	Global
Fugitive emissions from production and consumption of halocarbons and sulphur hexafluoride	Ex-ante issuance of emission reduction activities related to fugitive emissions from industrial gases (e.g., from SF6)*	Project-level and grouped projects	Global
Solvent use	Ex-ante issuance of emission reduction activities related to use of solvents	Project-level and grouped projects	Global
Waste handling and disposal	Ex-ante issuance of emission reduction activities related to waste (e.g., landfill methane capture and destruction and/or utilization, waste water treatment, and energy production from waste biomass)	Project-level and grouped projects	Global
Afforestation and reforestation	Ex-ante issuance for carbon sequestration/emissions reduction activities related to afforestation/reforestation	Project-level and grouped projects	Global
Agriculture	Ex-ante issuance of carbon sequestration/emissions reduction activities related to agriculture (e.g. soil tillage improvement)	Project-level and grouped projects	Global
Carbon Capture and Storage/Carbon Removal	Ex-ante issuance of carbon capture and storage -reduction of anthropogenic CO2 emissions into the atmosphere. CO2 is captured at large stationary sources and is injected into the deep subsurface for long-time storage/Carbon Removal-intentional efforts to remove carbon dioxide from the atmosphere, including land management strategies, accelerated weathering, ocean iron fertilization, biomass energy with carbon capture and sequestration (BECCS), and direct air capture and sequestration (DACS).	Project-level and grouped projects	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**
Icelandic Forest Carbon Code (Skógarkolefni)	FCC	V 1.0	01/12/2019	N/A	CO2	https://www.carbonregistry.con

SHEET C: ADDITIONAL EXCLUDED ACTIVITIES *(Here, list additional activities that the programme wish to **exclude** from TAB's assessment (if applicable, in case they are currently within the Scope of Eligibility in the pilot phase))*

Sector	Project/programme type(s)	Implementation level(s)	Geography(ies)

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

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**

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

[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;

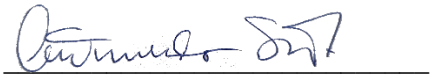
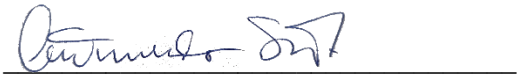
7.10. The Programme Registry will ensure that all cancellation information on its website is presented in a user-friendly format; is available at no cost and with no credentials required; is capable of being searched based on data fields; and can be downloaded in a machine-readable format, e.g., .xlsx;

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.

	
Programme Representative Signature	Registry Representative Signature
Guðmundur Sigbergsson	Guðmundur Sigbergsson
Programme Representative Name	Registry Representative Name
International Carbon Registry	International Carbon Registry
Programme Name	Registry Name
3/3/2024	3/3/2024
Date	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: International Carbon Registry

Administering Organization[5]: Loftslagsskrá Íslands ehf.

Official mailing address: Laugavegur 11, 101 Reykjavík, Iceland

Telephone #: +354 864 2388

Official web address: www.carbonregistry.com

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

Full name and title: Guðmundur Sigbergsson, Co-CEO and CSO

Employer / Company (*if not programme*):

E-mail address: gudmundur@carbonregistry.com Telephone #: +354 864 2388

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

Full name and title:

[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*):

E-mail address: Telephone #:

2. Registry Representative Information[6]

A. Registry Information

Registry / system name: International Carbon Registry

Administering Organization: Loftslagsskrá Íslands ehf.

Official mailing address: Laugavegur 11, 101 Reykjavík, Iceland

Telephone #: +354 864 2388

Official web address: www.carbonregistry.com

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

Full name and title: Guðmundur Sigbergsson, CEO

Employer / Company (*if not Registry Administering Organization*):

E-mail address: gudmundur@carbonregistry.com Telephone #: +354 864 2388

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

Full name and title:

Employer / Company (*if not Registry Administering Organization*):

E-mail address: Telephone #:

[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:	
	The ICR registration platform is administrated by Loftslagsskrá Íslands ehf. All procedures and amendments to requirements established by the ICR program are incorporated in the functions of the registry. The registry platform is developed by Mojoflower ehf. (Mojoflower), and supports all process requirements as they are outlined in the ICR Process Requirements and are based on other ICR documentation. This relates to data retention, public disclosure, and corresponding registration of project, issuances, transfers, retirements and cancellation. **1. Clear Methodologies and Protocols, and their Development Process:** The ICR has qualification and quantification methodologies and protocols in place and available for use as well as a process for developing further methodologies and protocols. The existing methodologies and protocols as well as the process for developing further methodologies and protocols are publicly disclosed. This is outlined in the ICR requirement document and ICR methodology requirements. **2. Scope Considerations:** The ICR defines and publicly discloses the level at which activities are allowed under the program, as well as the eligibility criteria for each type of offset activity. Both level of activities and eligibility criteria is publicly disclosed in the ICR requirement document. **3. Offset Credit Issuance and Retirement Procedures:** The ICR has procedures for how offset credits are: (a) issued; (b) retired or cancelled; (c) subject to any discounting; and, (d) the length of the crediting period and whether that period is renewable who are publicly disclosed in the ICR requirement document and ICR process requirement. **4. Identification and Tracking:** ICR has procedures ensuring that: (a) units are tracked; (b) units are identified through serial numbers and issued and tracked on public blockchains: (c) the registry is secure; and (d) units have clearly identified owners or holders. The ICR also stipulates (e) to which, if any, other registries it is linked; and, (f) whether and which international data exchange standards the registry conforms with. ICR uses public blockchains to ensure permissionless auditability of all credits issued, it also enables real-time inventory management and distribution. This increases transparency and benefits all stakeholders and ensures complete transparency and auditability of every issuance, transfer and retirement. All credits are created on Polygon, a public – permissionless - blockchain, providing a single public source of truth on ownership, volumes available and predicted, and related transactions (retirements, cancellations, transfers). **5. Legal Nature and Transfer of Units:** The ICR defines and ensures the underlying attributes and property aspects of a unit, and publicly discloses the process of transfers, this is done by issuing the units on a public – permissionless – blockchain The underlying attributes of a ICC is defined in the ICR definitions and processes of transferring credits are simply done from the user-friendly interface of the registry platform accompanied with user-guide.	

[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.

	6. Validation and Verification procedures: ICR has validation and verification standards and procedures, as well as requirements and procedures for the accreditation of validators and verifiers. All of the above-mentioned standards, procedures, and requirements are publicly disclosed namely, ICR requirement document, ICR process requirements, ICR validation and verification specifications and ISO 14064-3 and ISO 14065. **7. Program Governance:** The ICR is governed by Loftslagsskrá Íslands ehf. Established in Iceland. Administration and decision making are disclosed on ICR website. **8. Transparency and Public Participation Provisions:** ICR publicly discloses (a) what information is captured and made available to different stakeholders; and (b) its local stakeholder consultation requirements and (c) its public comments provisions and requirements, and how they are considered. Conduct public comment periods and transparently disclose all approved methodologies. This is disclosed in the ICR documentation, see here Overview - ICR Program (carbonregistry.com). **9. Safeguards System:** The ICR has in place safeguards to address environmental and social risks. These safeguards are publicly disclosed in the ICR requirement document. **10. Sustainable Development Criteria:** ICR publicly discloses the sustainable development criteria used, and provisions for monitoring, reporting and verification. This is disclosed in the ICR requirement document. **11. Avoidance of Double Counting, Issuance and Claiming:** ICR provides information on how double counting, issuance and claiming are addressed in the ICR requirement document and in ICR process requirements. With internal review and external assessment by VVBs registration with other GHG programs is addressed and by using public blockchains ensures that all issuances, transfers, cancellations and retirements are recorded, immutable and verifiable by the public, without needing permission or specific access rights to a centralized database, i.e. all credits and transactions are permissionlessly accessible on a public ledger. All transactions have unique transaction ID on the blockchain which can be used to prove claims. Once recorded on public blockchains all ICR credit data and history is readily available to all, providing assurance and reliability.
	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.*
	ICR registry backend platform can be accessed from all internet connected computers from https://app.carbonregistry.com/. ICR also supplies a sandbox/testing environment on https://sandbox.carbonregistry.com. All information on governance and structure of the ICR can be found on ICRs documentation site along with documentation relating to the ICR program or from within the registry platform. The public accessible registry platform is accessible from www.carbonregistry.com/explore The site features a comprehensive hierarchy of the registry accessible through www.carbonregistry.com/explore, organized into several key sections: • **Projects**: Provides an overview of projects along with their registration status. • **Methodologies**: Displays methodologies in a format akin to the CDM methodology booklet, offering detailed insights.

	• **Sectors**: Gives an overview of the various sectors covered by the registry. • **Credits**: Lists the credits that have been issued, including details on each. • **Organizations**: Presents information on organizations holding a registry account, including optional details such as credit inventory, associated projects, and more. • **Insights**: Features posts from organizations or projects, sharing updates or findings. All information available publicly from projects is accessible on the platform through our APIs, which anyone can access by creating an account on www.app.carbonregistry.com and creating and access token Additionally, because the registry issues all credits straight onto public blockchains all credit data is publicly available through multiple means. For example ICR has a subgraph on the decentralized Graph protocol that indexes all credit events on all deployed ICR smart contracts this includes all data on credit issuances, transactions, retirements and cancellations. This data, historical and current state, can also be fetched straight from Polygon via any blockchain provider of the user's choice (for example Alchemy / Infura) or blockchain explorer (polygonscan) The contracts ICR uses for issuing credits implement the ERC-1155 token standard, which combines fungibility and individuality of credit vintages. For all issued ICR smart contract addresses, see here. More details on how ICR employs blockchain for credit issuance and transactions are provided on the ICR documentation page, which offers a deeper understanding of the registry's operational framework.

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:	
	ICR distinguishes users from organizations. Individuals are free to register to the platform from the registry site. If users want to register projects for organization they need to complete KYC and become verified users. Organisations are created by the users and if they want to be eligible to register projects and issue instruments, they need to complete KYB to be a verified organizations and are eligible to register projects and issue credits, subject to conformity to ICR program requirements. If EU/international sanctions target the applicants' corresponding country of registration, ICR will follow their limitations for their registration of projects and/or issuances of instruments. The KYC and KYB processes ensure compliance from the start with built-in ID verification as well as PEP and sanctions list checks. KYC/KYB checks are provided by a 3rd party service provider and has been embedded to the registry platform.	
	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*.	
	ICR registry platform is accessible from all internet-connected computers/smartphones via www.carbonregistry.com (public) and www.app.carbonregistry.com(backend). The registration	

process is further outlined in the ICR Process Requirements available on the ICR documentation site along with the ICR terms and conditions for users and organizations. [Terms and conditions - ICR Program (carbonregistry.com)]

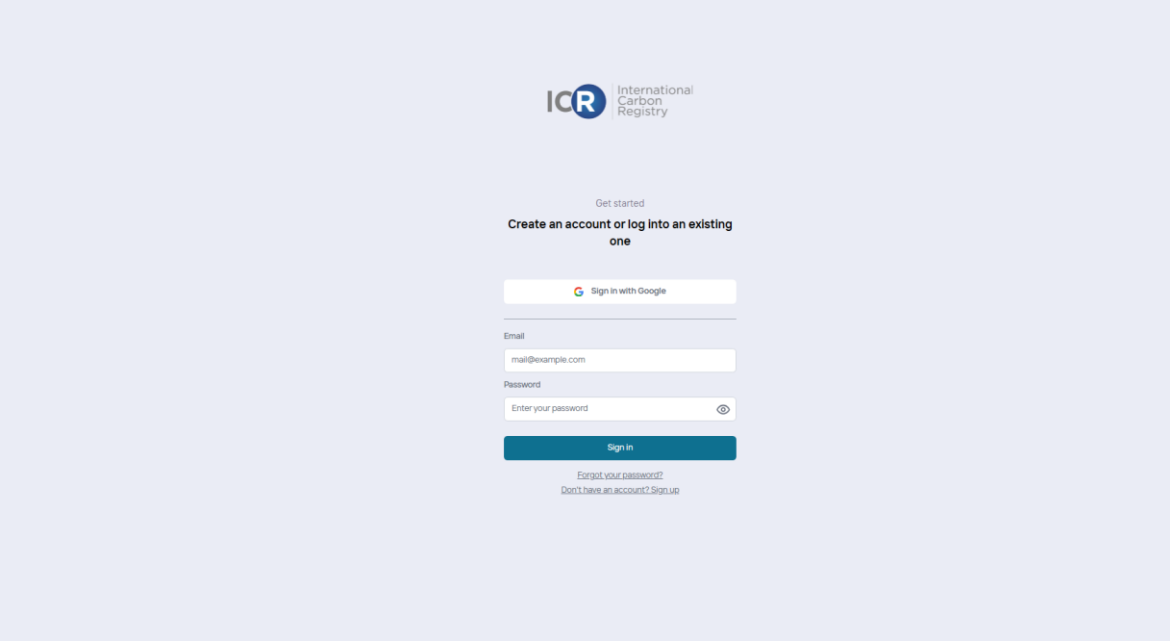


Figure 1: Account opening for users and login screen

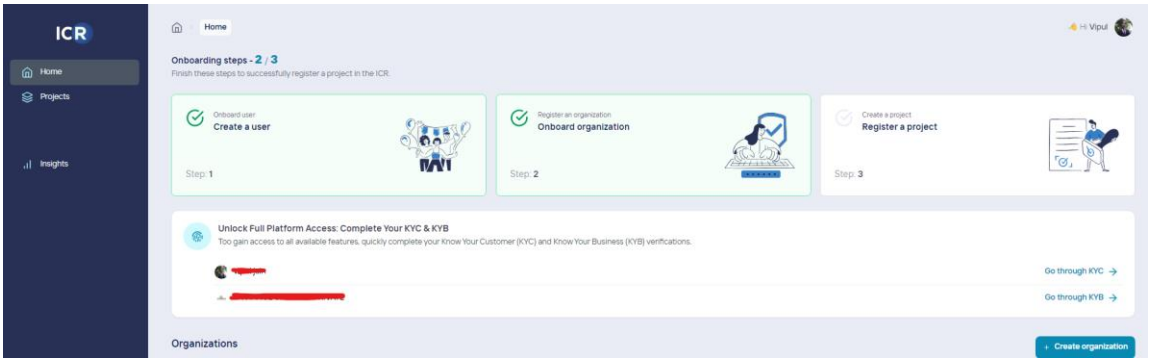
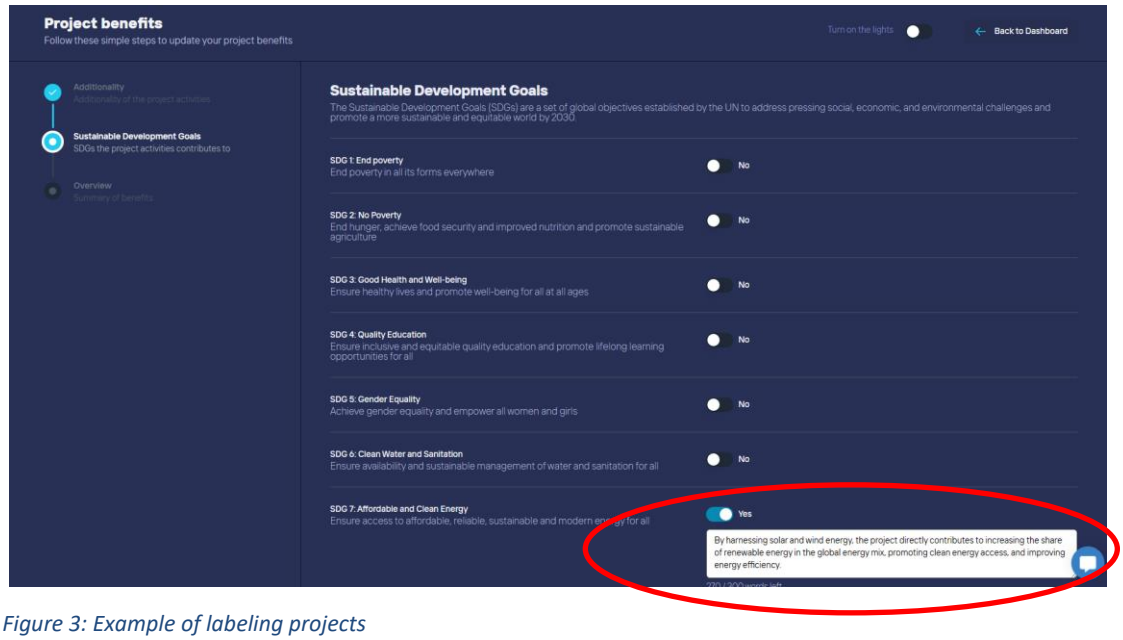
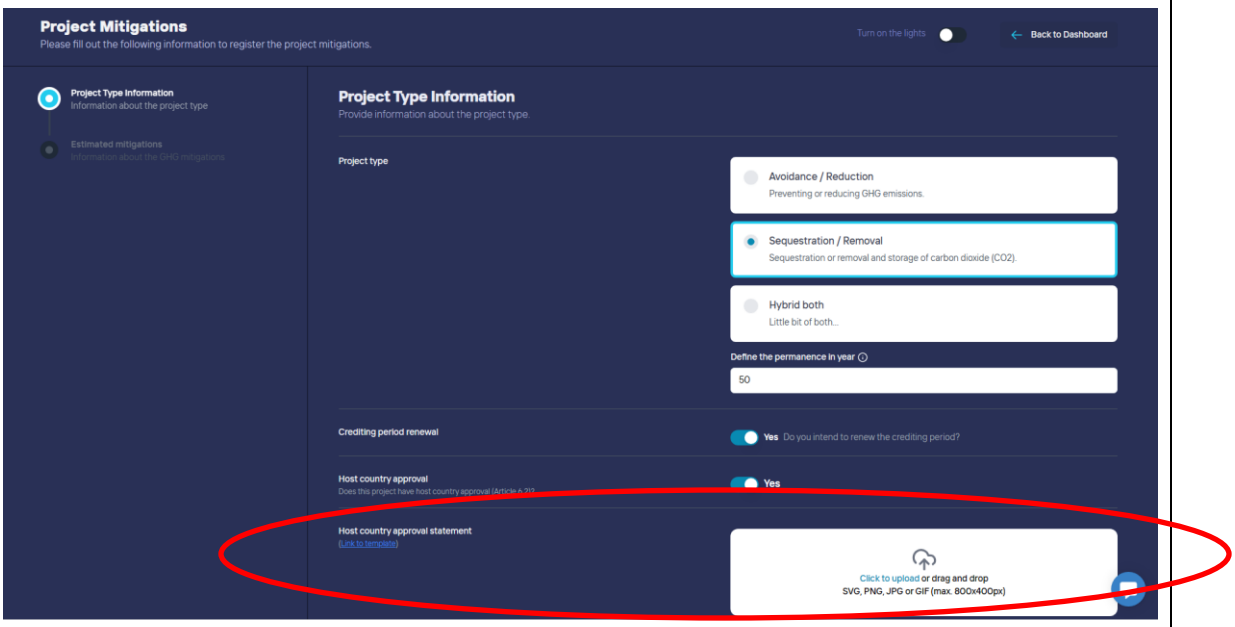


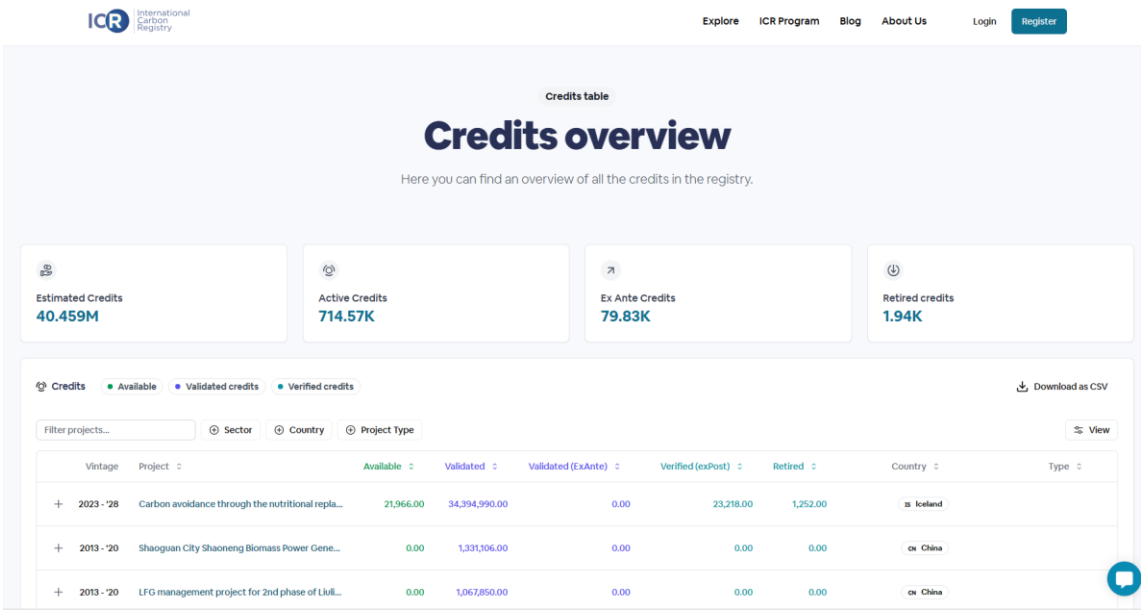
Figure 2: Onboarding new users/organizations and KYC/KYB process flow

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 implements this provision:	
	The ICR registry technology offers the ability to label credits with additional benefits. With this functionality, credits can easily be labeled as *"CORSIA Eligible Emissions Units"*	

	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*.
	For the implementation of procedures on identifying and labeling credits with being "CORSIA Eligible Emissions Units" will be established upon approval of ICR as an approved GHG Program where inclusions and exclusions of activities and/or vintages will be reflected. *NOTE: TAB would need a user account and organizational account with ICR to access this site. ICR would be happy to accommodate this upon TAB's request.*  *Figure 3: Example of labeling projects*

	Further ICR has established a protocol for host country attestation. Projects that have a host country approval for corresponding adjustment may upload documentation as evidence.  *Figure 4: Host country attestation example* Host country attestation is reflected in the serialization of credits. See further discussion on serialization.

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:	
	Account holders have permission to retire (cancel) International Carbon Credits (ICCs) and disclose the reason for the retirement/cancellation. An account can retire ICCs on behalf of itself, while market participants and project proponents can retire them for third-party organizations and transfer them to a beneficiary account. However, the process for retiring credits differs when initiated by a third-party; the initiating party must provide information about the organization retiring the credits, such as name and contact details. The registry then automatically creates a new temporary organization account and sends a message to the contact, informing them that credits were retired on behalf of their organization and information on how they can claim that account. The organization can then claim that account for future inventory management of credits and retirements, which is especially useful for any climate disclosure under regulatory schemes, i.e., CORSIA, CSRD or other ESG reporting requirments. For information on how to retire using the ICR platform, see the user guide here. Retired credits can be accessed on the public interface of the registry platform, including information on the reason for retirement and the serial numbers of the retired credits. Additionally,	

	this information is available on a public – permissionless - blockchain (polygon), to enhance transparency and traceability.  *Figure 5: Credits overview* See further credits under https://www.carbonregistry.com/explore/credits Also see ICR user guide on the functionality of the registry. https://documentation.carbonregistry.com/documentation/carbonregistry.com/registry-user-guide
	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.*
	In the ICR Process Requirements accessible on the ICR documentation site, documentation on the registration process can be found. Further information can be found in the User Guide available

from the registry platform or the documentation site. https://documentation.carbonregistry.com/documentation/carbonregistry.com/registry-user-guide

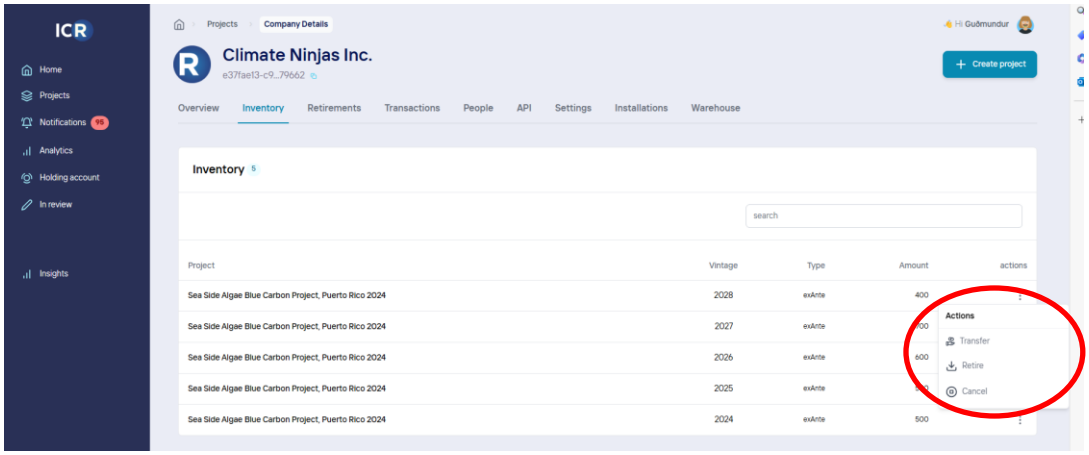


Figure 6: Credit actions

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:	
	As described in Table A5 Field 5 the processes of retirements of credits in the registry platform is conforming to the requirements. Each block of credits is issued in batches and is represented by a serial number that identifies a quantity of carbon credits and underlying attributes. Credits can only be issued where the project has a "validated" status. ICR uses the following scheme for credit identifiers:	

Component	Order	Type	Length	Range	Comment
Credit identifier	1	Letter	3	Text	Fixed value. Unique registry identifier. (ICC, FCC)
Project Country	2	Letter	3	ISO 3166-1	Three-letter country code for the project (e.g., Iceland is ISL).
Project country dialing code	3	Numeric	3	1-999	Three-digit country code for the project (e.g., Iceland is 354).
Project ID	4	Numeric	4	1-9999	Registry assigned identifier for the project, unique in the registry.

Sector	5	Numeric	2	1-16	Sectors from CDM
Type	6	Letter	1	A, R, H	Avoidance, Removal, Hybrid
Host country attestation	7	Numeric	1	1;0	1 = Yes, 0 = No attestation
Vintage (Year)	8	Numeric	4	0-9999	The vintage year of the credits.
Multiple project activities	9	Numeric	3	0-999	ID of a sub-project. If not multiple project activities, this identifier is not used.

Example: ICC-ISL-354-33-13-A-0-2022
GHG program: *International Carbon Registry*
Project Country*: Iceland*
Dialling code: *354*
Project ID: *33*
Sector: *Waste handling and disposal*
Type: *Avoidance*
Host country attestation: *No approval for ITMO transfer.*
Vintage*: 2022*
Multiple project activities: *Not a Multiple project activity.*

Any retirement is made public instantly of confirmation by user of retirement. Each retirement is accompanied by a transaction ID, which can be used to further provide evidence of the retirement on the public ledger in an immutable manner and a traditional retirement certificate. All retirements can be accompanied by comments and/or notes by the user retiring the credits, in order to provide additional information related to the retirement.

These notes are made public, along with the following details:

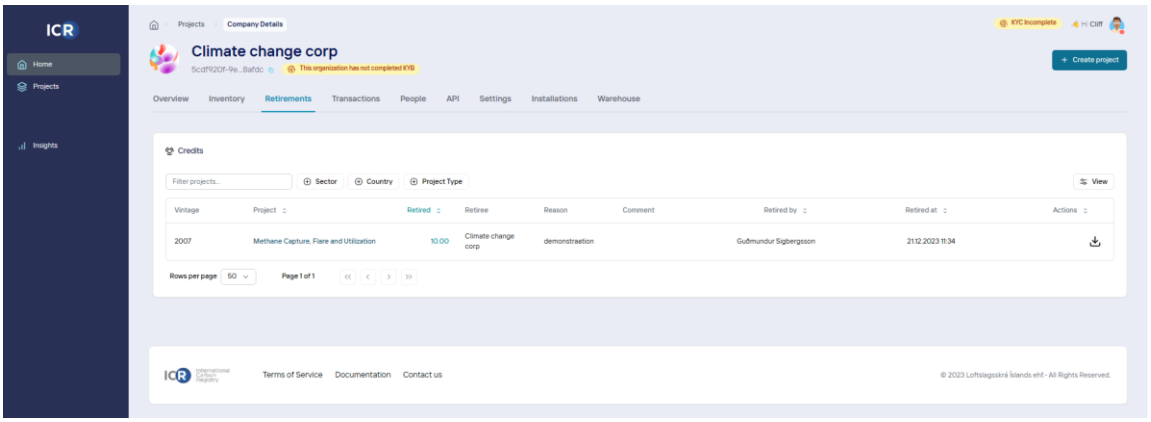
The retirement information provides the serial number reflecting the quantity retired, date of retirement, reference to the GHG program, unit type, and the host country.

Further, the credits are linked to the underlying project where further information can be accessed, e.g., methodology, location, documentation, crediting period, etc.

The account includes information on the account number, the account owner, and the beneficiary of the retirement.

On the public site, all retirements are visible, with the following information:

- Serial number
- Vintage
- Project name
- Sector
- Issuance date
- Location
- Project site
- Retirement reason
- Quantity

	In addition all retirements are registered as transactions using ICR smart contracts and therefore instantly available onchain For more info on how to access ICR credit data see here.
	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.*
	In the ICR Process Requirements accessible on the ICR documentation site, documentation on the registration process can be found. Further information can be found in the User Guide available on the registry platform and documentation site. All credit actions are available from the registry platform. See: ICR Process Requirements v5.0 - ICR Program (carbonregistry.com) Registry user guide - ICR Program (carbonregistry.com) Carbonregistry.com Information about retirements can be found from front and backend of the registry. Users can access from their organizational account retirement section where retirements are segregated. They can be filtered and retirement certificate downloaded.  *Figure 7: Retirement screen from back-end (mockup data from development platform)* This information is also available on public end of the registry. Either information can be accessed from organizational profiles, project sites or credits section. This information can also be accessed straight from the source, because all credits /the transactions are registered on public blockchains. See here for more info.

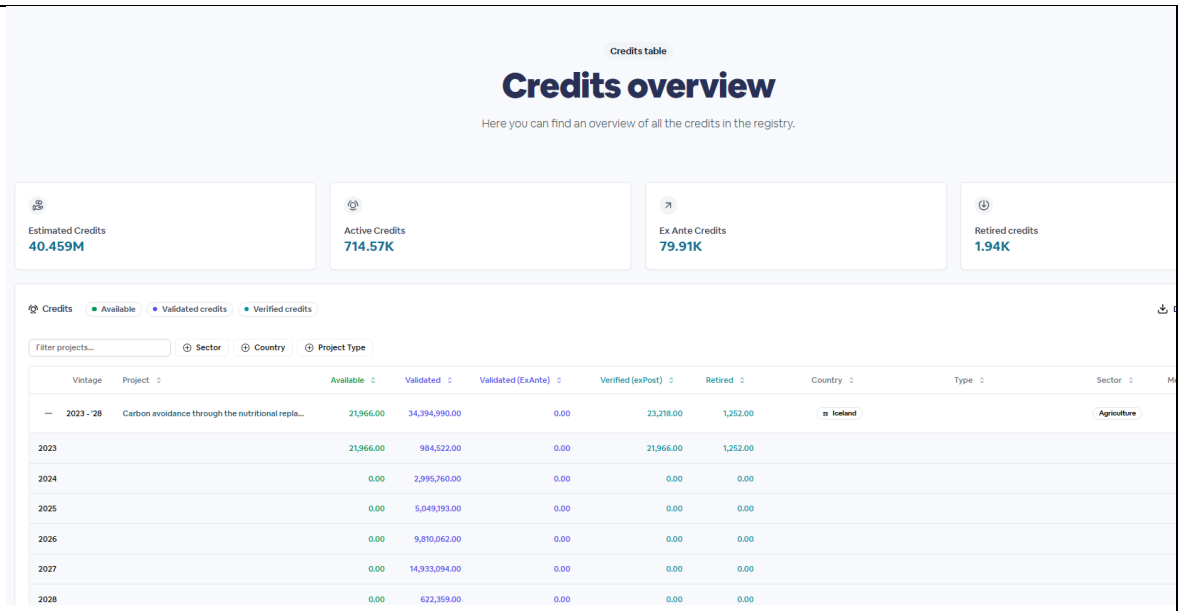
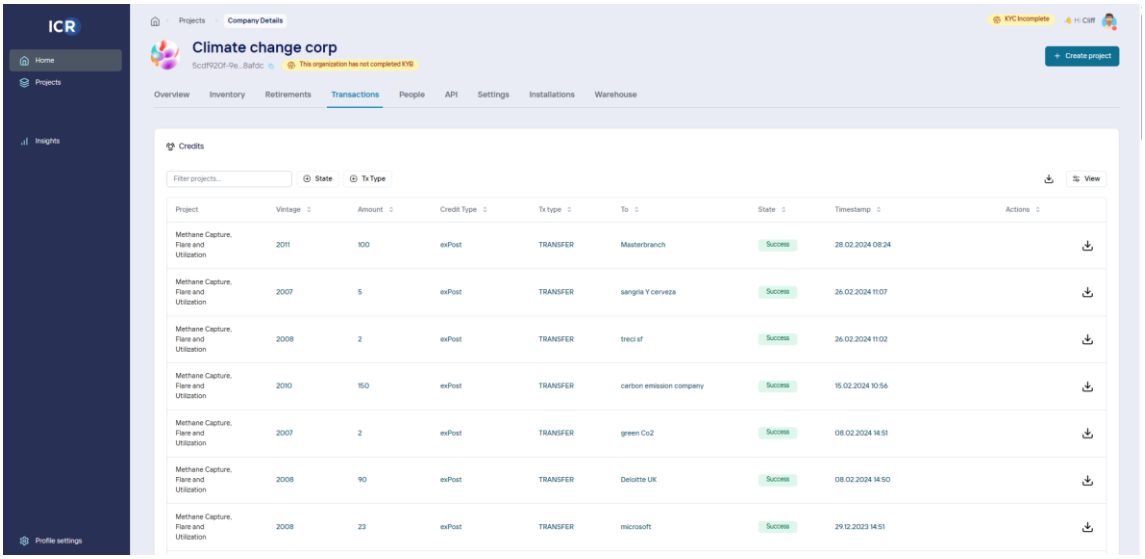


Figure 8: Credits overview

See below links
Credits Carbonregistry.com
Project Carbon avoidance through the nutritional replacement of beef by carbon neutral Icelandic Spirulina (blue-green algae) production (carbonregistry.com)
Organization retiring credits: Carbonregistry.com

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:	
	The registry platform automatically sends an email to contacts of organizations to confirm the retirement of credits, which is directed to the stakeholders of the account, accompanied by a statement of the retirement. If an organization retires or transfers credits on behalf of a third party, the contact person of the third party receives an email inviting them to claim the account on behalf of their organization. Once claimed, the organization can manage its credits and report on retirements. Organizations can manage their credits from the credit section, filtering by credit status, such as retired. The registry offers a variety of reports that can be requested or downloaded in multiple formats. These reports are available to the account holder subject to their user permission assigned. They can also be distributed to organizations such as ICAO. Additionally, these reports are customizable to meet the specifications of the emissions unit cancellation report outlined in Annex 16, Volume IV, Chapter 4. In the account settings of the registry, account holders can export reports (.xlsx/.csv) of their credit portfolio, including their credit statuses. They can also access unique links generated from the	

	retirements to refer to their retirements. Furthermore, organizations can refer to their retirements from unique links generated from the retirements or refer to them onchain.	
	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.*	
	In the ICR Process Requirements accessible on the ICR website, documentation on the registration process can be found. Further information can be found in the User Guide available on the registry platform and ICR documentation page. Specifically here are guides on the different credit actions and here is information on where organizations have an overview of their credit inventory and retirements. Users with the necessary permission can view multiple credit actions from their respective organizational accounts. From the organizational account, they have an overview of their account, inventory management, retirements (cancellations), transactions history, people management (users), APIs, Settings, Installations of apps, and warehouse management of inventory.  *Figure 9: Transaction log (data captured from public blockchain) (mockup data from sandbox)*	

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:	
	a. First and foremost, the registry is cloud-based. The API is hosted on Digital Ocean, which implements strong security measures to safeguard the servers, databases, and applications. Digital Ocean maintains SOC 1 Type II, SOC 2 Type II and SOC 3 Type II, ISO/IEC 27001 and PCI-DSS certifications. System maintenance is carried out exclusively by authenticated users who access the cloud-hosted applications and servers to upkeep the application and infrastructure. Every user has a distinct ID and must authenticate using two-factor authentication to gain access to the servers and databases. Additionally, Registry Users are granted varying levels of access based on their roles and the accounts they are assigned to. The registry frontend is hosted on Vercel using the fullstack framework NextJS. Most of the registry data is stored in a postgresql database hosted on Supabase, see certifications here. All sensitive data is *only* accessible through MFA and all credentials are encrypted or hashed to ensure in the event of a databreach the authentication/authorization layer is non-compromised. The credit data itself (supply, serialization, holders, transactions, retirements, cancellations) is stored on public blockchains (specifically Polygon), ensuring permissionless public access to the data, immutability of history and public independent auditing of issuances, retirements, cancellations and other transactions by every individual with an internet access. Public data can't be compromised. b. Yes, documentation may be disclosed upon request. Documentation about the registry may be found on ICR documentation page. On Chain - ICR Program (carbonregistry.com) API - DEPRECATED - ICR Program (carbonregistry.com) c. Each account is secured with either with a verified email and password, where the password is only stored as a hash, or via an OAuth2.0 authentication using the Google SSO lower the risk in event of a weak password. In addition, when possible, electronic identification standards such as eIDas are utilized for heightened protection. Two-factor authentication is mandatory during sign-up, and then optional for regular sign on. In addition to ICR procedures on KYC authentication of users. Under setting user may opt to add two-factor authentication for logins, change their password, complete KYC and more. KYC (and KYB) checks is serviced by Taktikal. d. The registry is developed with a user account creation and management framework that assigns different levels of access and capabilities to meet individual user needs and permissions assigned to them. This framework ensures that users receive access only to the data and features for which they have authorization, depending on their account classification and permissions. Organizations with accounts can utilize this to tailor their users access levels and roles to meet unique operational demands. This allows users to use the platform with assurance, aware that they are only engaging with the information and features they are permitted to use. This further ensures a secure and efficient experience by providing users with access strictly to the resources and activities they are allowed by their authorized representative.	

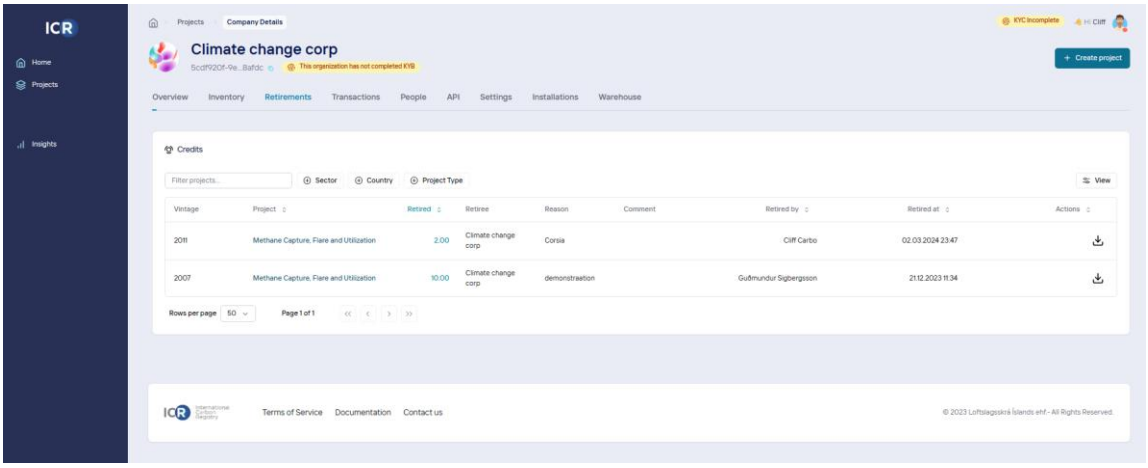
	Every user account has its own password protection (MFA when applicable) and is authorized to access its projects and organizations, depending on the level of permission granted. The degree of permission granted is based on KYC (know your customer) compliance, as well as the user's history on the system and permissions granted by the authorized representative. An authorized admin has the ability to change the user's account role and status as needed. e. For every transfer or retirement, an authorized user's explicit consent is mandatory to validate the transaction. All transactions are logged and timestamped to ensure traceability internally as well on a public ledger. Additionally, automated emails and account notifications are dispatched to inform users about the transfers. It is also possible to use multi-signature approval for each action. Further based on different user roles some actions are only permitted by organizational admins, such as transfers, retirements, cancellations, issuance, and more. These are all opted for confirmation by the admin before the action is completed. All Current authentication meets industry best practices and is maintained and updated according to a daily, weekly, monthly, and annual schedule of completed tasks. Security procedures will be updated regularly and will adhere to SOC2/IS27001 compliance standard and GDPR regulations and aims include being certified by third party auditors in 2024.
	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.*
	The registry user guide sets out guidelines on the application of the registry platform and is publicly accessible. Registry user guide - ICR Program (carbonregistry.com)

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:	
	In the event of a data breach, the following steps will be taken per internal best practices. 1. Secure the affected systems: The first priority is to stop the breach by isolating the affected systems and securing them to prevent further unauthorized access. This includes pausing/blocking *all* published contracts/interactions with project contracts and credits on supported blockchains. 2. Investigate the breach: Determine the scope and extent of the breach, including the type and amount of data that was compromised, the timeline of the attack, and the methods used by the attacker.	

	3. Notify the appropriate parties: Depending on the nature and extent of the breach, various parties may need to be notified, including affected individuals, law enforcement, regulatory authorities, service providers and business partners. 4. Offer assistance to affected individuals: If personal information has been compromised, offer assistance available resources to help individuals protect themselves from harm. 5. Implement corrective measures: Once the breach has been contained and the scope of the damage assessed, implement corrective measures to prevent future breaches, such as improving security policies, employee training, technical controls or vendor management. 6. Review and update security practices: Review the security practices to identify weaknesses and gaps that may have contributed to the breach and take steps to address them. 7. Communicate proactively: Communicate with customers, employees, and other stakeholders in a transparent and proactive manner about the breach and the steps being taken to mitigate the damage and prevent future incidents. This may be done via e-mail, phone, and public social media posts. After steps 1-2 in the list above relevant parties will be notified which includes informing ICAO secretariat about any material deviations and concerns.
	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.*
	See Terms and Conditions for users, organizations and projects available on ICR website along with ICR registry platform and ICR Privacy Policy available on ICR website along with ICR registry platform. Terms and conditions - ICR Program (carbonregistry.com) Privacy policy - ICR Program (carbonregistry.com)

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:	
	All ICR credits are issued on Public blockchains (specifically on Polygon), there is *no* other centralized database ICR uses to register credits. This means the credits issued on public blockchains via ICR smart contracts are the *only* ICR credits that exist. This makes auditability and access to ICR credit data permissionless – the data is readily available to all who have internet access – and the transaction history is immutable. This means that all transactions or management of ICR credits is public knowledge, so reversibility of transactions is essentially impossible because of the open nature of public blockchains. Upon retirement, carbon credits are securely stored in a designated address (the NULL address), where they can be publicly viewed but not transferred and are locked indefinitely and makes retirements irreversible. Transaction information may include amount of retirement, account responsible for the retiring, retiree and may include a	

[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.

	reason for retirement. This information is displayed in real-time within the user account and public profile of each project, promoting transparency and providing an overview of credit status. Retirement process enables identification of the credit's specific application, depending on the market being transacted in. If a holder of a CORSIA credit wishes to retire a CORSIA-eligible unit, they can designate CORSIA as the motive for employing the retirement to meet the obligations under CORSIA, segmented by compliance period. The registry may be facilitated to display transaction by allowing the customization of the retired credits details, which CORSIA members can review in line with Verification of Emissions Unit Cancellation Report.
	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.*
	In the User Guide and in the ICR process requirements, the process of retirement is outlined. For more information on the specific contracts used by ICR see Contracts and How it works.  *Figure 10: Retirements overview (mockup data from sandbox platform)*

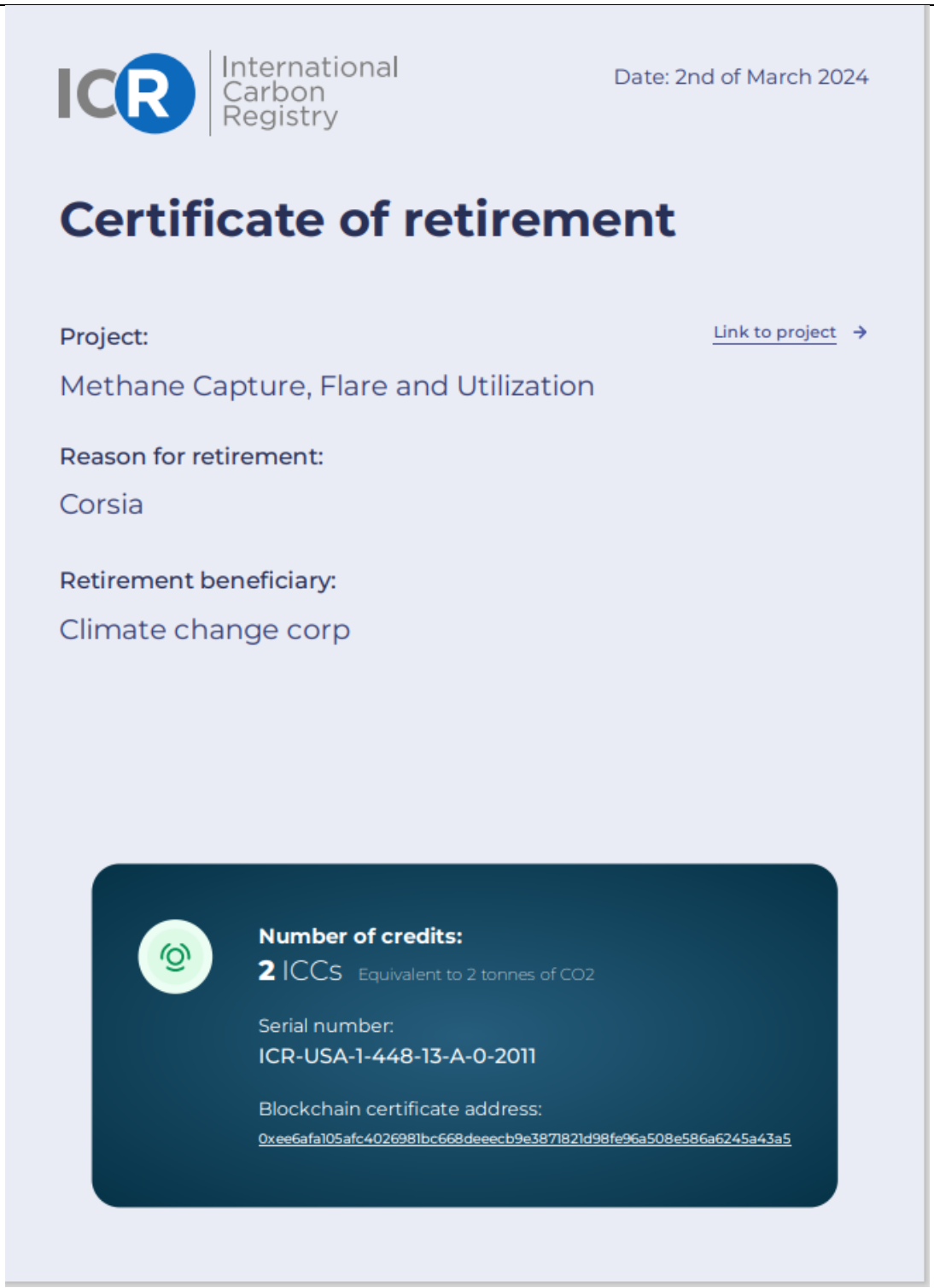


Figure 11: Retirement certificate demo (mockup data from sandbox platform)

7.10	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
	Describe how the Registry implements each provision in rows a – d:	
	All information on retirements is readily available from the credit section of the public registry interface. There is no cost associated with accessing the information on the public registry, and users can access information in a user-friendly format without disclosing any credentials. Further, individuals can easily establish an account to engage further with the platform. In the credit section of the ICR registry platform, credits can be searched by the serial id of the credits or the credit status, e.g. retired. a. Information about status of credits is included for the full lifecycle of the project and are available free of charge available to anyone both from the registry and from the public ledger. b. Yes, information about credits and projects are available to visitors, anyone with an internet connection and status of credits may also be independently verified looking at the public blockchain ledger. c. Yes, the Programme Registry ensures that all cancellation information on its website is capable of being searched based on data fields and indexing tables. d. Yes, all cancellation data may be downloaded in table form via the ICR homepage as well as all information recorded on public ledger. The status of credits may not only be accessed from the credit section but also from each project, credits may be accessed, and their status reviewed. In addition, from organizations profiles, organizations that have retired credits have their profile (not mandatory) from there, retirements made be different organizations may be explored.	
	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.*	

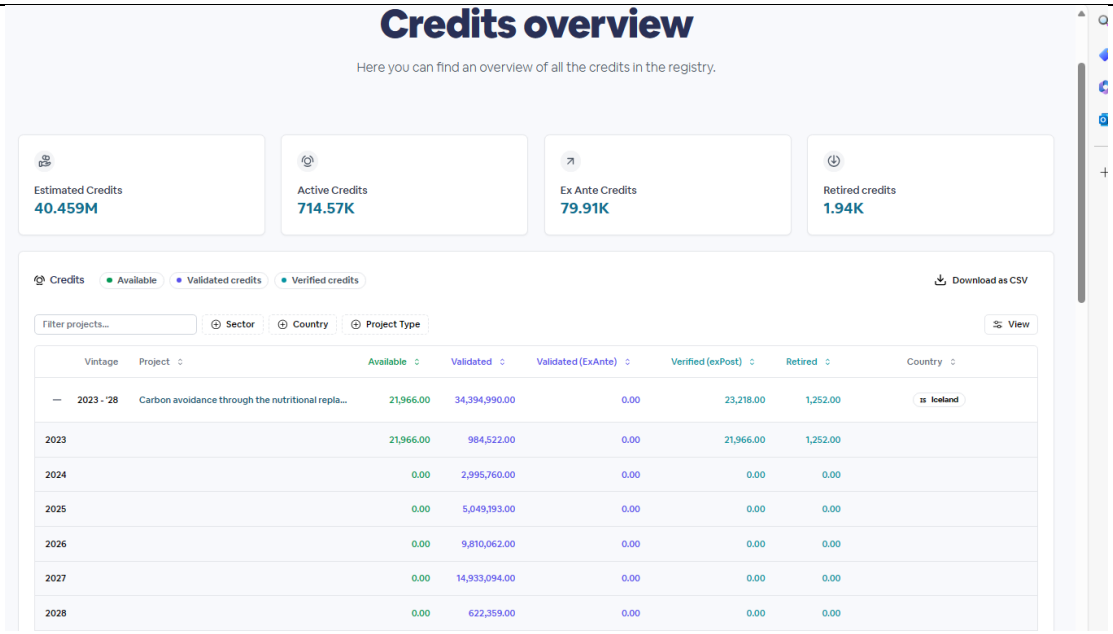


Figure 12: Overview of credits section

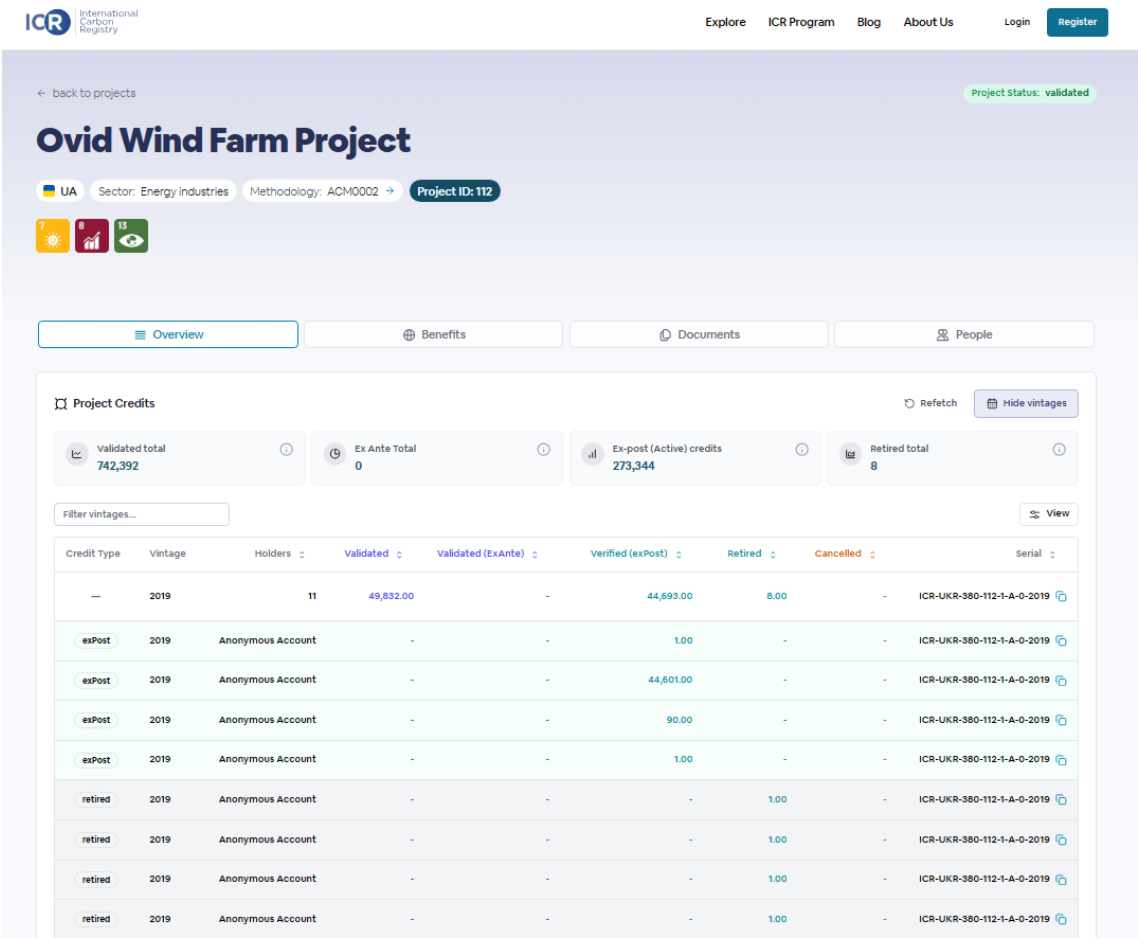


Figure 13: Overview from project section

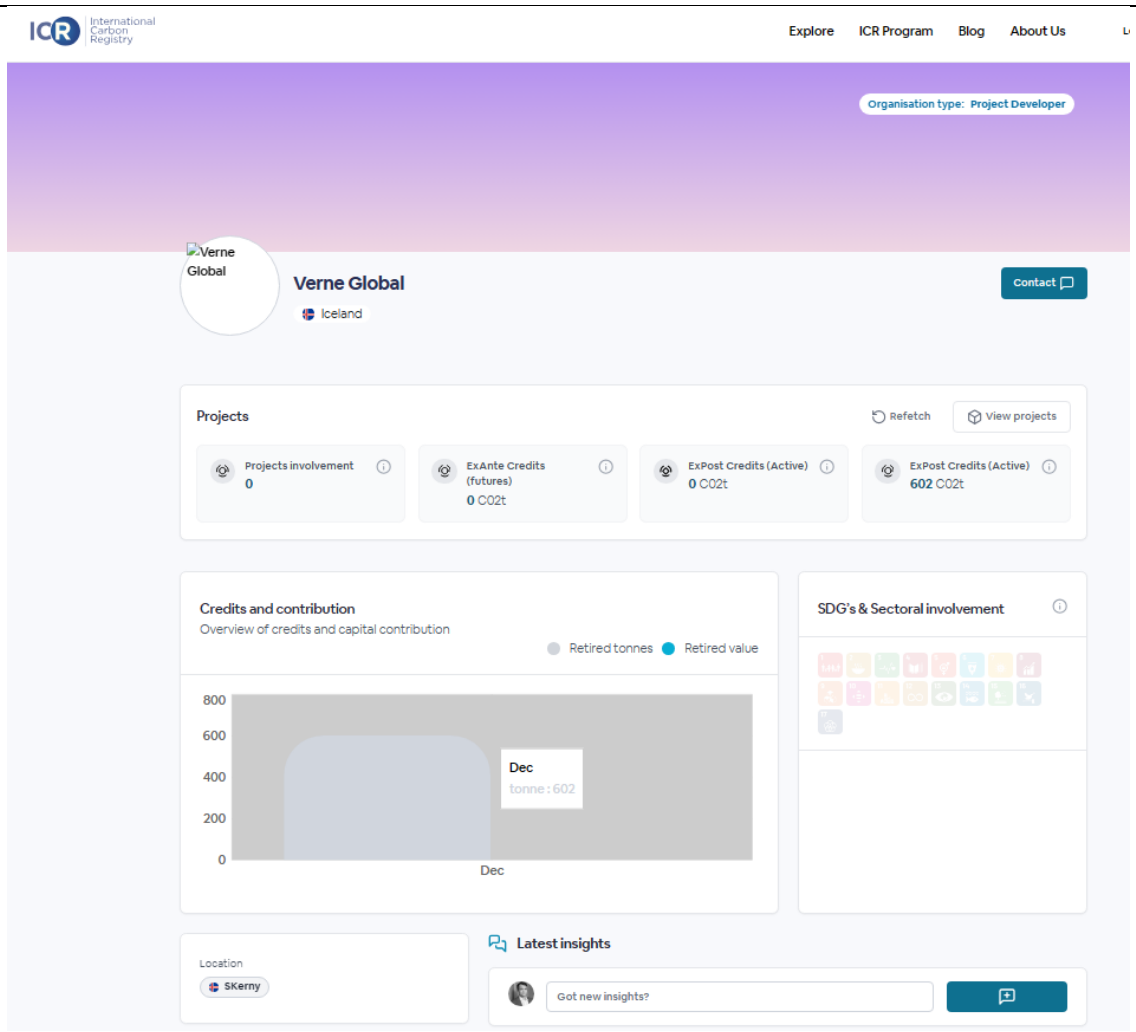


Figure 14: Overview from organizational section

Please see

https://www.carbonregistry.com/explore/credits

https://www.carbonregistry.com/explore/projects

https://www.carbonregistry.com/explore/organizations

7.11	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:	

	All submitted documents and records are kept for a minimum of 7 years after the last retirement of credits issued and activated resulting from the project activities as outlined in the ICR Process Requirements. Further, ICR intends to keep records of issuances and retirements and will continue to disclose publicly without time limitations. In case of dissolution, all information will continue to exist on-chain, with all relevant publicly disclosed information and data stored and continue to be publicly disclosed.
	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.*
	See further in the ICR process requirements available on ICR documentation site: https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v5.0