

Frequently Asked Questions on
Programme Applications for Assessment by the Technical Advisory Body (TAB)
(as of April 2020)

1. What is the timeline for the TAB’s evaluation process?

Answer: The TAB work programme and timeline for evaluating programme applications and making recommendations to the ICAO Council can be found on the ICAO website [here](#).

2. Will programmes have additional opportunities to apply for evaluation in the future?

Answer: The application process is iterative. The second programme application period ends on 20 April 2020. The third programme application period is expected to begin in January 2021, as noted in the [TAB work programme and timeline](#).

3. Should a programme submit an application if the programme itself is still under development?

Answer: Programmes that are still under development and uncertain about their “readiness” for evaluation and eligibility are encouraged to thoroughly review the [Emissions Units Criteria](#), as well as the *Guidelines for Criteria Interpretation* in [Appendix A – Supplemental Information](#) prior to submitting an Application Form for the current evaluation cycle.

The TAB work programme and timeline notes that “the TAB process above is iterative, and the third programme application period is foreseen to begin in January 2021.”

Thus, the TAB has indicated its openness to inviting further applications in the future, including from programmes developed in the future.

4. How should a programme proceed if it plans to implement procedures that are consistent with the Emissions Units Criteria and Guidelines for Criteria Interpretation, but is unable to do so prior to the application form deadline?

Answer: If the programme is unable to demonstrate by the submission deadline that procedures to address a given criterion or guideline are “in place”, programmes are requested to describe their *plans* to revise any programme procedures and standards to meet the criterion or guidelines in their response to the relevant question(s) in the application form.

Section II: Instructions in the [Application Form](#) explains how a programme should describe any such programme revisions, including the information required.

The TAB will further consider how to respond to these proposed developments on a case-by-case basis and with consideration to its timeline.

5. Does a programme have to be of a certain “size” in order to be eligible to submit an application form?

Answer: At this time, there are no prerequisites with respect to a minimum or maximum quantity of offsets issued, or number of activities supported, for submitting an application form.

Some programmes support implementation of activities at a larger scale, e.g., national, sub-national, rather than project-based or programmatic activities. In response to an application from such a programme, the TAB may consider how the Emissions Units Criteria can be most appropriately applied to assess the programme—including whether the TAB will evaluate the primary programme, or if it is necessary to instead or also evaluate specific national or sub-national programmes in their own right. The TAB may follow up with the programme administrator as necessary to proceed with its evaluation.

6. What types of “actors” and activities are the focus of the TAB’s evaluation?

Answer: The focus of the TAB’s evaluation is at the “level” of an emissions unit programme. An emissions unit programme administers standards and procedures for developing activities that generate offsets, has unique methodologies, and has validation and verification procedures, and registry infrastructure, which ultimately facilitate the “issuance” of offsets.

The TAB assesses programmes that are considered to be fully “operational”. A programme is considered operational at the stage that it fits the above description, and, in particular, has methodologies *in place* and *available for use* (i.e. publicly available and not in draft format).

The TAB may also evaluate a programme’s rule-set as it pertains to specific project or activity “types”, e.g., sectors or emissions categories.

The TAB is not expected to evaluate an individual activity outside of an evaluation of the emissions unit programme’s procedures, standards, protocols, infrastructure, and governance arrangements that support the activity. This means that TAB will not evaluate, e.g., individual projects or project developers; or emissions unit retailers, brokers, exchange platforms, or other types of *owners* of emissions units.

7. What happens if the TAB does not recommend a programme for eligibility? Does this mean the programme will not ultimately be considered by the ICAO Council when it decides eligible programmes?

Answer: The TAB is likely to summarize its findings and recommendations for each programme that applies, such that substantive consideration will be given to each programme. Examples of TAB's recommendations resulting from its first assessment can be found [here](#).

8. How will key procedures (e.g., the Emissions Units Criteria and Guidelines for Criteria Interpretation) and documentation be governed on an ongoing basis? For example, how will the criteria be managed and updated in future, and how will programmes need to demonstrate ongoing compliance?

Answer: The procedure for future updates to the *Emissions Units Criteria and Guidelines for Criteria Interpretation*, and expectations for maintaining consistency with these provisions, are issues that are currently being considered by an ICAO working group. Details will be announced once further recommendations and decisions are made. The TAB's recommendations resulting from its first assessment also contain initial guidance for managing programme eligibility, which can be found in Section 4.1.2.2 of [this document](#).

9. I own emissions units developed under a programme or standard which has not been approved to be eligible for use in CORSIA. How can my units become eligible for CORSIA? Can one apply for eligibility outside of any eligible program?

Answer: Only an emissions unit programme administrator or their designated representative can apply for the TAB's assessment and engage in the assessment process. Project developers or offset retailers that create or transact emissions units generated under a given emissions unit programme are welcome to inform that programme of the opportunity to apply, but cannot apply on its behalf.

The TAB assesses emissions unit programmes that administer standards for developing and validating projects, for monitoring and verifying emissions reductions, and for issuing and then tracking the emission units. The TAB does not assess individual projects or offset suppliers like project developers, brokers, retailers, or other market intermediaries.

After the its assessment, the TAB makes recommendations to ICAO Council on programme eligibility. The ICAO Council then considers TAB's recommendations before making a final decision.

One can see examples of applicant organizations from the 2019 TAB assessment on the ICAO website [here](#). There, one can find archived applications, assessment criteria and guidelines, and recommendations resulting from the 2019 TAB assessment. This material indicates the kind of organizations assessed by the TAB.

10. Does the TAB prefer or prioritize eligibility of emissions reductions in any particular sector(s)?

Answer: The ICAO Council has not requested that the TAB prioritize the assessment of any activity types or sectors over others. Where a given emissions units criterion is relevant to a particular category of activities, the TAB may make sector-specific recommendations. For example, in its 2019 assessment, the TAB restricted the eligibility of some forestry and land use activities to those that are integrated into regional or national scale baselines and monitoring systems. This is in line with its application of the [Emissions Unit Criteria](#) and *Guidelines for Criteria Interpretation related to avoiding an increase in emissions elsewhere*, sometimes referred to as “leakage risk” (Application Form, Appendix A – Supplementary Information, available [here](#)). In this manner, the TAB is attentive to some specific project categories, if and as necessary to apply the Emissions Unit Criteria—but the TAB does not prioritize such assessments.

11. The Emissions Unit Criteria include a section on Sustainable Development and Safeguards. How can my programme meet those criteria?

Answer: For examples of sustainable development procedures which the TAB found were consistent with the Emissions Unit Criteria, please see the 2019 programme applications and the TAB recommendations on the ICAO website, available [here](#). Comparing applications that were assessed and TAB’s eventual recommendations illustrates how TAB approached programmes’ implementation of sustainable development criteria.

Additionally, the implementation of sustainable development criteria is discussed several times in the TAB recommendations. There are several requests in the TAB recommendations that programmes take further action to fully align with this criterion. For example, the TAB requested that a few programmes expand on their existing project reporting requirements by making such reporting functions mandatory for projects that wish to label their units as CORSIA-eligible; and to clearly identify the sustainable development criteria which projects should refer to when doing so (e.g., the Sustainable Development Goals (SDGs) or an alternative list of sustainable development criteria., or indicators, that is maintained by the programme for this purpose).

12. If a programme is approved to supply CORSIA-eligible emissions units in the pilot phase, will it be eligible for subsequent compliance periods as well? If not, what is the process to re-apply for eligibility? Would the Emissions Unit Criteria be the same? How would TAB apply the emissions unit date eligibility?

Answer: The TAB recommendations only apply for offsetting emissions in the CORSIA pilot phase (2021-2023). To be eligible for future compliance cycles, the TAB has indicated that the programmes will need to be re-assessed. TAB procedures have not yet been communicated to eligible programmes with respect to *how* these kinds of interim assessments (or re-assessments) will be undertaken, and *when*. Once these procedures are communicated to eligible programmes, they will be published on the ICAO website.

In the meantime, the [2019 TAB recommendations](#) outline a procedure to ensure that eligible programmes meet and maintain their consistency with the Emissions Unit Criteria on an ongoing basis. Programmes should be consistent throughout the term of their eligibility, rather than just during the application process.

The *General Eligibility Parameters* section in the TAB recommendations discusses emissions unit date eligibility, where TAB recommends a) the start dates and end dates for emissions unit eligibility (i.e. eligible project start dates and vintages); and b) the eligibility timeframe (i.e. how long those units should be eligible for use under the CORSIA). There, the TAB noted that, when considering any extension of these eligibility dates, the programmes will be re-assessed to ensure their consistency with *all* Emissions Unit Criteria and *Guidelines* going forward. As is noted throughout the TAB recommendations, this includes some specific provisions in the EUC and *Guidelines* pertaining to, e.g., *Host Country Attestations* and *Additionality* that the TAB identified as not being fully relevant to its initial recommendation given the limited range of emissions unit eligibility dates (2016-2020). It noted that programmes will be expected to have all of these required procedures in place as basis for informing decisions to extend the emissions units eligibility dates *or* to extend their eligibility for use beyond the CORSIA's pilot phase. Changes to the Emissions Unit Criteria and Guidelines are not foreseen, but programmes and their procedures are expected to respond to, and remain robust in light of, the evolving international context (particularly with respect to relevant guidance under the UNFCCC Paris Agreement).

13. If a host country has its own registry, could CORSIA-eligible units exist in a programme registry and the national registry at the same time? Can a country claim an emissions unit which is also eligible for use in CORSIA?

Answer: Please see [Appendix A of the Application Form](#), specifically sections 2.4, 3.4, and 3.7. TAB expects an eligible emissions unit programme to host the emissions units that are deemed eligible. Some programmes allow national registries to be linked. The [TAB recommendations](#) indicate that, at least initially, the TAB has only assessed the programmes' "centralized" registries, and has not assessed or recommended any national registries that may be linked to central programme-designated registry systems. TAB identified that it would need to assess any national registry to be used in CORSIA which is linked to a centralized programme registry. If the TAB recommends that the registry is consistent with the relevant Emissions Unit Criteria and Guidelines, and the ICAO Council approves, then the national registry could be added to the programme's *Scope of Eligibility* included in the ICAO Document "CORSIA Eligible Emissions Units."

The [Emissions Unit Criteria](#) include many requirements related to registries because CORSIA relies on robust registries. These requirements include security procedures, transparency, and necessary functionality to support aeroplane operators' fulfillment of CORSIA requirements.

With respect to the relationship between national accounting, national registries, and eligible programmes, the registry requirements play an important role. Any national registry would be assessed according to the registry criteria in the Emissions Unit Criteria.

The avoidance of double-counting, double-issuance, and double-claiming is one of the emissions unit criteria by which the TAB assesses programmes. The criterion and detailed *Guidelines*, some of which are relevant to registry administrators, can be found in sections 2.1 and 3.7 of [Application Form, Appendix A – Supplementary Information](#).

14. Appendix A of the Application Form says that a CORSIA-eligible emissions unit programme should have insurance coverage of \$5 million USD. What kind of insurance does this refer to?

Answer: Appendix A of the Application Form, available [here](#), contains guidelines for the interpretation of the “Programme Governance” criterion. Section 2.7.4 of these guidelines notes:

2.7.4.Liability coverage: 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.

The type of insurance referred to here is “professional liability insurance”, also called “professional indemnity insurance.” This applies to independent emissions unit programmes, rather than government-administered programmes.