



December 5, 2020

Office of the Environment
Air Transport Bureau
International Civil Aviation Organization (ICAO)
Tel.: +1 514 954 8219, ext. 6733
Email: officeenv@icao.int

Dear ICAO Office of the Environment,

Per our letter dated November 25, 2020 confirming ACR's acceptance of the terms of eligibility for supplying CORSIA Eligible Emissions Units, we herein formally notify you of ACR's material changes to our Program application, most importantly expanding the scope of eligibility for post-2020 ACR units. The form has been corrected since the version submitted yesterday to include all changes as separate items.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Grady".

Mary Grady
Director, American Carbon Registry
Winrock International

CORSIA Eligible Emissions Unit Programme Change Notification Form

PART A: ABOUT THIS FORM

Once an emissions unit programme is approved by the ICAO Council as eligible to supply CORSIA Eligible Emissions Units, the programme commits to notify the ICAO Secretariat of any “material changes” to its “Scope of Eligibility”, for further review by the Technical Advisory Body (TAB) that advises the ICAO Council on the eligibility of emissions units for use in CORSIA.

*TAB Procedures*¹ defines a “Material Change” as an update to a programme’s *Scope of Eligibility* that would alter the programme’s response(s) to any questions in its application form and further inquiries from the TAB over the course of the programme’s assessment (paragraph 8.4).

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

Annually, TAB will indicate deadlines for programmes to notify ICAO of any such material changes. These notifications should be submitted by the next deadline after the material change has occurred; the upcoming deadlines are indicated in the version of the *TAB Work Programme and Timeline* document that is currently effective. This document is available on the CORSIA website².

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

PART B: PROGRAM CHANGE NOTIFICATION(S)

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

Programme name: **American Carbon Registry (ACR)**

CHANGE 1
a. Description of the change (e.g., the addition, modification, deletion undertaken): ACR would like to change the Program Administrator to Mary Grady. Her name will remain also as the Program Representative.
b. Rationale for the change: Mary Grady has recently been promoted to ACR Director. John Kadyszewski is Director Emeritus.

¹ In *TAB Procedures*, paragraphs 4.5, 7.5, and 8.2 – 8.6 in particular pertain to the *Scope of Eligibility* and notification and assessment of material changes.

² The *TAB Work Programme and Timeline* and *TAB Procedures* documents are available here: <https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx>

c. Where the change is reflected in the Programme's documentation or other resource(s)³:

**The change in positions is noted publicly on the "about us" page of ACR's website:
<https://americancarbonregistry.org/about-us/team>**

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

In ACR's Program Application Form dated July 12, 2019, under Section III Program Application, Section B, John Kadyszewski, ACR Director, was named as Program Administrator, and in Section C, Mary Grady, ACR Deputy Director, was named as Program Representative.

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

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

CHANGE 2

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

ACR has completed a 60-day stakeholder consultation to update its standard to version 7.0, which goes into effect January 1, 2021. The material ICAO-relevant changes that are now incorporated include:

- **Converting in 6.E all annual attestation requirements to the same attestations (for regulatory compliance, ownership and community and environmental/social impacts of the project) to the project Monitoring Report;**

b. Rationale for the change:

The changes in attestation timing were to enhance reporting efficiencies by including the same attestations (no change in substance) in verified Monitoring Reports rather than as a separate process / annual document;

c. Where the change is reflected in the Programme's documentation or other resource(s)⁴:

**The changes are all reflected in the published ACR Standard v7.0:
<https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>**

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

³ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

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

Annual attestations were originally described in the 2019 ACR application to “provide evidence that the Program complies with social and environmental safeguards” and that “the Program’s public disclosure of the institutions, processes, procedures that are used to implement, monitor and enforce safeguards to identify, assess and manage environmental and social risks.” (Paragraph 3.8).

The substance of ACR’s response has not changed. Chapter 8 of the ACR Standard continues to include public disclosure of the institutions, processes and procedures that are used to implement, monitor and enforce safeguards for environmental and social risks. In addition, the requirement for Project Proponents to disclose environment and community impacts and mitigation measures has not changed nor has the VVBs requirement to confirm assertions at Validation and at each Verification for the duration of the project crediting period.

The only change is with regard to timing in that the attestation related to the continuance, ownership and community impacts of a project are now included in the Monitoring Report rather than as a separate requirement.

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

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

CHANGE 3

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

ACR has completed a 60-day stakeholder consultation to update its standard to version 7.0, which goes into effect January 1, 2021. The material ICAO-relevant changes that are now incorporated include:

- **Removing language in section 10.B on double claiming that references pre-2021 market context including double claiming with Emission Trading Schemes and under the Kyoto Protocol.**

b. Rationale for the change:

ACR never experienced any of the situations as described with regard to avoiding double counting with ETS or Kyoto Protocol (and no longer accepts CDM methodologies), therefore eliminating this reference and focusing on the post-2020 Paris Agreement context was logical.

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

The changes are all reflected in the published ACR Standard v7.0: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

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

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

ACR's policies and procedures to assure that units "are only counted once toward a mitigation obligation" and to "avoid double issuance, double use and double selling" (Paragraph 3.7) included reference in ACR Standard Section 10.B to policies in a pre-Paris carbon market context. Since ACR never experienced any of the situations as described with regard to avoiding double counting with ETS or Kyoto Protocol (and no longer accepts CDM methodologies), ACR Standard v7.0 eliminates this language, focusing on the post-2020 Paris Agreement.

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

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

CHANGE 4

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

ACR has completed a 60-day stakeholder consultation to update its standard to version 7.0, which goes into effect January 1, 2021. The material ICAO-relevant changes that are now incorporated include:

- **Adding Appendix B: ACR's Requirements for Avoiding Double Counting with ICAO's CORSIA, detailing requirements for host country letters of authorization, reporting of corresponding adjustments to the UNFCCC and compensation for or replacement of units used under the CORSIA and also claimed by the Host Country towards meetings its NDC (the "compensation mechanism").**

b. Rationale for the change:

These detailed requirements were added to ensure conformance with Paris Agreement and ICAO CORSIA requirements for avoiding double counting of post 2020 units and to detail a compensation mechanism(s) for the CORSIA.

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

The changes are all reflected in the published ACR Standard v7.0: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

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

ACR's responses to the TAB in its original application referred to double counting and claiming requirements (Paragraph 3.7.3) in ACR Standard Section 10, including requirements in 10.B.1 to avoid double counting with the CORSIA.

In response to the ICAO application regarding "what measures the Program would consider putting in place in relation to the guidelines in Paragraphs 3.7.10-3.7.13", ACR stated that some of these procedures were already in place in Section 10 of the ACR Standard and that ACR would be putting in place "requirements to monitor for and report to ICAO and the UNFCCC instances of double claiming (i.e. required accounting adjustments have not been made to

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

national emissions reporting of host country); and a mechanism to compensate for, replace or otherwise reconcile instances of double claiming.”

On August 24, 2020, ACR formally submitted these requirements to ICAO in the proposed Appendix to the ACR Standard. This Appendix B is now published.

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

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.