

TECHNICAL ADVISORY BODY (TAB)
RECOMMENDATIONS ON CORSIA ELIGIBLE EMISSIONS UNITS

The following is an excerpt from the TAB Report of September 2021

4 TAB RECOMMENDATIONS FROM ITS 2021 ASSESSMENTS

4.1 TAB RECOMMENDATIONS ON NEW APPLICATIONS

4.1.1 Programmes invited to re-apply

4.1.1.1 TAB recommends that the following emissions unit programmes should be invited to re-apply:

- CERCARBONO (see further details in Section 4.1.2)
- ProClima (see further details in Section 4.1.3)

4.1.1.2 The specific findings by TAB in terms of criteria consistency and areas for further developments are provided below. TAB will assess once changes to the programme procedures are in place and the programme provides such information to the TAB in line with a future call for applications.

4.1.2 CERCARBONO

Criteria consistency

4.1.2.1 TAB recommends that eligibility decisions regarding CERCARBONO should not be taken at this time. TAB found that CERCARBONO's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2021 were partially consistent with the contents of the EUC, for emissions units generated under the programme prior to 1 January 2021.

4.1.2.2 TAB found that CERCARBONO demonstrated technical consistency with the contents of the following criteria: a) validation and verification procedures, b) carbon offset credits must have a clear and transparent chain of custody within the offset program, c) scope considerations, d) transparency and public participation provisions, and e) clear methodologies and protocols, and their development process.

Areas for further development

4.1.2.3 TAB found that CERCARBONO demonstrated technical consistency with some, but not all, contents of the following criteria: a) programme governance, b) safeguard systems, c) sustainable development criteria, d) carbon offset credits must represent emissions reductions, avoidance, or carbon sequestration from projects that do no net harm, e) offset credit issuance and retirement procedures, f) identification and tracking, g) legal nature and transfer of units, h) carbon offset credits must be quantified, monitored, reported, and verified, i) carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional, j)

carbon offset credits must be based on a realistic and credible baseline, k) permanence, l) a system must have measures in place to assess and mitigate incidences of material leakage, and m) avoidance of double counting, issuance and claiming.

- 4.1.2.4 TAB found that CERCARBONO demonstrated technical consistency with some, but not all, contents of the criterion Are only counted once towards a mitigation obligation. This common finding is further discussed in Section 4.3.5 of the TAB Report (January 2020) from its first assessment¹⁷. It also informed the general eligibility parameters set out in that same TAB Report. TAB noted CERCARBONO's explanation that it was willing to address the risk of double claiming in its procedures.
- 4.1.2.5 TAB would like to encourage CERCARBONO to remain engaged in TAB's assessment process. TAB will re-assess the programme once changes to the programme procedures are in place and the programme provides such information to TAB in line with a future call for applications.

4.1.3 **ProClima**

Criteria consistency

- 4.1.3.1 TAB recommends that eligibility decisions regarding ProClima should not be taken at this time. TAB found that ProClima's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2021 were partially consistent with the contents of the EUC, for emissions units generated under the programme prior to 1 January 2021.
- 4.1.3.2 TAB found that ProClima demonstrated technical consistency with the contents of the following criteria: a) legal nature and transfer of units, b) transparency and public participation provisions, c) clear methodologies and protocols, and their development process, d) validation and verification procedures, e) carbon offset credits must have a clear and transparent chain of custody within the offset program, and f) scope considerations.

Areas for further development

- 4.1.3.3 TAB found that ProClima demonstrated technical consistency with some, but not all, contents of the following criteria: a) programme governance, b) safeguard systems, c) sustainable development criteria, d) carbon offset credits must represent emissions reductions, avoidance, or carbon sequestration from projects that do no net harm, e) offset credit issuance and retirement procedures, f) identification and tracking, g) carbon offset credits must be quantified, monitored, reported, and verified, h) carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional, i) carbon offset credits must be based on a realistic and credible baseline, j) permanence, k) a system must have measures in place to assess and mitigate incidences of material leakage, l) avoidance of double counting, issuance and claiming, and m) are only counted once towards a mitigation obligation.
- 4.1.3.4 TAB would like to encourage ProClima to remain engaged in TAB's assessment process. TAB will re-assess the programme once changes to the programme procedures are in place and the programme provides such information to TAB in line with a future call for applications.

¹⁷ Available here: https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB%202020/TAB_JANUARY_2020_REPORT_EXCERPT_SECTION_4_EN.pdf

4.1.4 Applicants not possible to assess

4.1.4.1 TAB was unable to assess the following applicant organization at this stage. Organizations in this category are typically not possible to assess due to either their early stage of development, or because key elements of an emissions units programme, in line with the EUC and TAB's interpretations, were not in place at the time of TAB's assessment:

- REDD.plus (see further details in Section 4.1.5)

4.1.5 REDD.plus

General findings

4.1.5.1 TAB was unable to assess REDD.plus against the EUC because key elements of an emissions unit programme, in line with the EUC and TAB's interpretations, were not in place at the time of TAB's assessment.

4.2 TAB RECOMMENDATIONS ON PROCEDURAL UPDATES ASSESSED IN 2021 ASSESSMENT CYCLE

4.2.1 TAB recommends updated eligibility parameters for some emissions unit programmes that were previously approved for immediate eligibility to supply CORSIA Eligible Emissions Units, for which TAB assessed material procedural updates submitted by these programmes in this cycle:

- Architecture for REDD+ Transactions (see further details in Section 4.2.3)
- Verified Carbon Standard (see further details in Section 4.2.4)

4.2.2 The eligibility of the emissions units should remain subject to the general eligibility parameters set out in the Section 4.1 of the TAB Report (January 2020) from TAB's first assessment cycle¹⁸ unless otherwise specified in Sections 4.2.3, and any additional programme-specific parameters set out for each given programme, respectively, in Sections 4.2.3 and 4.2.4, which should be clearly described in the ICAO document titled "CORSIA Eligible Emissions Units". The recommendations in this section do not retroactively disallow currently eligible registered activities.

4.2.3 Architecture for REDD+ Transactions (ART)

TAB recommendations based on material procedural updates assessed

4.2.3.1 In light of ART's material procedural updates submitted for and assessed in TAB's 2021 assessment cycle, TAB recommends the following programme-specific amendments to ART's *Scope of Eligibility*, which should be clearly described in the ICAO document titled "CORSIA Eligible Emissions Units":

Eligibility Timeframe: Eligible for cancellation for use toward CORSIA offsetting requirements in the 2021 – 2023 compliance cycle; and

¹⁸ See footnote 17 of this report – Link to first TAB Report (January 2020)

Eligible Unit Dates: Issued to activities that started their first crediting period from 1 January 2016¹⁹ and in respect of emissions reductions that occur through 31 December ~~2020~~2023.

- 4.2.3.2 The eligibility of the emissions units should remain subject to the general eligibility parameters set out in Section 4.1 of TAB’s Report (January 2020) from its first assessment²⁰ and updated as recommended in paragraph 4.2.3.1 of this Report, and the programme-specific parameters set out for the programme in the 5th edition of the ICAO document titled “CORSIA Eligible Emissions Units” (March 2021).

Background on programme status

- 4.2.3.3 TAB’s assessment in its 2020 assessment cycle found that ART’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2020 were fully consistent with all EUC, for emissions units generated under the programme prior to 1 January 2021. TAB recommended ART as *immediately eligible* to supply CORSIA Eligible Emissions Units, which the Council approved at its 221st session.
- 4.2.3.4 TAB also recommended, and the Council accepted and requested ART to update, or finalize updates to, programme procedures related to the guidelines for host country attestation, for TAB to assess in respect of future recommendations on the extension of the eligibility dates referred to in Section 4.1 of TAB Report (January 2020) from its first assessment²¹. TAB identified that this action did not need to be taken prior to describing ART in the ICAO document titled “CORSIA Eligible Emissions Units”.

Summary of material procedural updates

- 4.2.3.5 In April 2021, ART submitted for TAB’s assessment on the programme’s procedural updates related to the guidelines for host country attestation, in response to the Council’s “Further actions requested of the programme”. TAB assessed these updates as material procedural updates to ART’s earlier-stage procedures and programme elements related to host country attestations, which were assessed in 2020.

General findings

- 4.2.3.6 TAB found that ART’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2020, supplemented by material procedural updates submitted for TAB’s assessment in April 2021, were fully consistent with all EUC for emissions units generated under the programme prior to 1 January 2021, as well as those generated in the near future.
- 4.2.3.7 TAB found that ART’s updated procedures demonstrated technical consistency with the contents of the criterion Are only counted once towards a mitigation obligation, including the guidelines related to host country attestations. TAB noted that CORSIA eligible emissions unit programmes, including ART, were requested to finalize their work on these procedures, for TAB to assess in respect of future recommendations on the extension of current eligibility dates. The consistency of ART’s updated measures with the EUC contents and guidelines pertaining to the avoidance of

¹⁹ According to the crediting period start date specified at the time of registration.

²⁰ See footnote 17 of this report – Link to first TAB Report (January 2020)

²¹ See footnote 17 of this report – Link to first TAB Report (January 2020)

double-claiming thus informed TAB's recommendation to extend ART's eligibility dates as described in paragraph 4.2.3.1 of this report. TAB further identified the importance of these procedures providing for Host Party attestations to specify the expected timing and/or trigger(s) for applying and reporting adjustments. TAB noted the importance of reviewing these specific programme elements and their early performance in line with TAB's re-assessment of CORSIA eligible emissions unit programmes in 2022 taking into account relevant developments in the UNFCCC and Article 6 of the Paris Agreement. Section 4.4 of TAB Report (Jan. 2021)²² summarizes TAB's considerations and interpretations in undertaking this and similar assessments.

Programme-specific eligibility parameters

4.2.3.8 *Scope:* ART submitted for TAB's assessment in its 2020 assessment cycle all activity types and scales, unit types, methodologies, and procedural categories supported by ART, supplemented by material procedural updates to programme procedures submitted by December 2020 and April 2021 deadline assessed under TAB's assessment in 2021 cycle. TAB does not, at this time, recommend any further exclusions from or limitations to the scope of the programme's eligibility beyond those set out in paragraph 4.2.3.1 of this report.

Further actions requested of the programme

4.2.3.9 TAB recommends that the Council request ART to elaborate in an update to its guidance or standard at the earliest opportunity procedures providing for Host Party attestations to specify the expected timing and/or trigger(s) for applying and reporting adjustments. These actions do not need to be taken prior to updating ART's description in the ICAO document titled "CORSIA Eligible Emissions Units".

4.2.4 Verified Carbon Standard (VCS)

TAB recommendations based on material procedural updates assessed

4.2.4.1 In light of VCS' material procedural updates submitted for and assessed in TAB's 2021 assessment cycle, TAB recommends amendments to the VCS' *Scope of Eligibility*, as specified in paragraph 4.2.4.4, which should be clearly described in the ICAO document titled "CORSIA Eligible Emissions Units".

4.2.4.2 The eligibility of the emissions units should remain subject to the general eligibility parameters set out in Section 4.1 of TAB's Report (January 2020) from its first assessment²³, and the programme-specific parameters set out for the programme in the 5th edition of the ICAO document titled "CORSIA Eligible Emissions Units" (March 2021).

²² Available here: https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB%202021/TAB_Report_January_2021_final.Excerpt.Section%204.pdf

²³ See footnote 17 of this report – Link to first TAB Report (January 2020)

Background on programme status

- 4.2.4.3 In prior assessment cycles, TAB found that the VCS procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2019 were consistent with the contents of the EUC, for emissions units generated under the programme prior to 1 January 2021.
- 4.2.4.4 TAB also recommended, and the Council accepted and requested, that VCS “update, or finalize updates to, programme procedures” related to the guidelines for host country attestation, for TAB to assess in respect of future recommendations on the extension of the eligibility dates referred to in Section 4.1 of the TAB Report (Jan. 2020) from its first assessment²⁴. This action does not need to be taken prior to describing VCS in the ICAO document titled “CORSIA Eligible Emissions Units”. TAB’s assessment of the programme’s response to this request is elaborated in paragraph 4.3.1.3.
- 4.2.4.5 TAB’s recommendations also identified specific methodologies that were assessed in prior assessment cycles in 2019 and 2020 as consistent with the EUC and so listed in the ICAO document. Methodologies that are not on the list are reviewed by TAB prior to being listed, as their addition the ICAO document would constitute a material change to the programme’s eligibility scope.

Summary of material procedural updates and general findings

- 4.2.4.6 In this assessment cycle, based on further information submitted by VCS, TAB assessed and identified additional VCS project-level methodologies that align with the EUC and TAB’s approach to applying the EUC during its prior assessment cycles in 2019 and 2020, which are recommended for addition to the VCS’ *Scope of Eligibility*.

Programme-specific eligibility parameters

- 4.2.4.7 *Scope*: The VCS submitted for TAB’s assessment most, but not all, activity types and scales, unit types, methodologies, and procedural categories supported by the programme. TAB recommends that exclusions from or limitations to the programme’s eligibility scope described in the ICAO document titled “CORSIA Eligible Emissions Units” should include those set out in the general eligibility parameters in Section 4.1 of the Report (January 2020) from the TAB’s first assessment; and those specified for VCS in 5th edition of the ICAO document titled “CORSIA Eligible Emissions Units” (March 2021), with the following additions or amendments:
- d) VCUs issued to project-level activities, including projects following the VCS Jurisdictional and Nested REDD+ (JNR) framework, that are developed in REDD+ countries²⁵ and utilize methodologies within the programme’s Sectoral Scope 14 and are estimated²⁶ to generate greater than 7,000 Verified Carbon Units (VCUs) / annum individually or grouped **with these allowable exceptions**:

²⁴ See footnote 17 of this report – Link to first TAB Report (January 2020)

²⁵ Referring to countries that are pursuing elements of REDD+ as defined in key decisions relevant for reducing emissions from deforestation and forest degradation in developing countries (REDD+), including the Warsaw Framework for REDD+

²⁶ See footnote 20 of this report

- a. VCUs issued to project-level activities under a jurisdictional programme following Scenario 2 of the VCS JNR framework
- b. VCUs issued under a jurisdictional programme following Scenario 3 of the VCS JNR framework
- c. VCUs issued to project-level activities that utilize one of the following methodologies: VM0012, VM0017, VM0021, VM0022, VM0024, VM0026 (and VMD0040), VM0032, VM0033, VM0036, VM0041, VM0042²⁷.

Further actions requested of the programme

4.2.4.8 TAB does not recommend any additions to the recommended further actions requested of the programme in Section 4.2.2.4 of the Report from TAB's first assessment.

4.3 OTHER FINDINGS ON PROCEDURAL UPDATES ASSESSED BY TAB IN THE 2021 ASSESSMENT CYCLE

4.3.1 Verified Carbon Standard

4.3.1.1 TAB's assessments in 2019 and 2020 found that Verified Carbon Standard (VCS) procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2019 were consistent with the EUC, for emissions units generated under the programme prior to 1 January 2021. TAB recommended VCS as *immediately eligible* to supply CORSIA Eligible Emissions Units, which the Council approved at its 219th session and updated in line with clarifications recommended by TAB during its 221st session.

4.3.1.2 TAB also recommended, and the Council accepted and requested, that VCS "update, or finalize updates to, programme procedures related to the guidelines for host country attestation, for TAB to assess in respect of future recommendations on the extension of the eligibility dates referred to in Section 4.1 of the TAB Report (Jan. 2020) from its first assessment"²⁸. This action does not need to be taken prior to describing VCS in the ICAO document titled "CORSIA Eligible Emissions Units".

4.3.1.3 In April 2021, VCS submitted for TAB's assessment programme procedures related to the guidelines for host country attestation, in response to the Council's "Further actions requested of the programme". TAB assessed these updates as material procedural updates to earlier-stage VCS procedures and programme elements related to host country attestations, which were assessed in 2019. TAB found that these VCS procedures demonstrated technical consistency with some, but still not all, contents of the criterion Are only counted once towards a mitigation obligation. TAB noted VCS progress on the development of these procedures and its continued willingness to put in place the measures to ensure that emissions reductions resulting from its activities are consistent with the EUC contents and guidelines pertaining to the avoidance of double-claiming, in the context of the Paris Agreement and decisions taken under the UNFCCC.

4.3.1.4 VCS also submitted information on updates to its procedures pertaining to global warming potential (GWP) values used to convert GHG emission reductions to CO₂ equivalent; and to its

²⁷ These methodologies are in addition to the list contained in the Verified Carbon Standard (VCS) listing in the ICAO Document "CORSIA Eligible Emissions Units"

²⁸ See footnote 17 of this report – Link to first TAB Report (January 2020)

Jurisdictional and Nested REDD+ framework (VCS JNR), elements of which are included under the current VCS' *Scope of Eligibility*. Several of these recent updates to the JNR Requirements (now version 4.0) were described to TAB during its first assessment cycle in 2019 but were still undergoing consultation and finalization. VCS has since finalized these and other related updates and submitted them for TAB's review in April 2021. Due to the number of updates and their relevance to the work of several TAB sub-groups, TAB's review of these procedures did not conclude by TAB/9. TAB expects to conclude this review by TAB/10.
