

CORSIA Eligible Emissions Unit Programme Change Notification Form

Version 2.0; Effective from 10 January 2022

PART A: ABOUT THIS FORM

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

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

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

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

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

PART B: PROGRAM CHANGE NOTIFICATION(S)

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

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

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

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

Programme name: SOCIALCARBON Standard

CHANGE 1
<p>a. Description of the change (e.g., the addition, modification, deletion undertaken):</p> <p>The ICAO Council requested that SOCIALCARBON completes the following action before being reconsidered for CORSIA eligibility:</p> <p style="padding-left: 40px;">a) to update programme requirements and procedures related to the accreditation of validation and verification bodies, in order to require that all validators and verifiers approved by the programme are accredited according to standards, procedures and requirements that are publicly disclosed;</p> <p>Change made: All VVBs must Accredited under ISO 14065 by an accreditation body that is a member of the International Accreditation Forum. This update meets the requirement that all VVBs are accredited according to standards, procedures and requirements that are publicly disclosed.</p> <p>Evidence - https://www.socialcarbon.org/s/SOCIALCARBON-Standard-Guide-v11-pnw7.pdf</p> <p>Note: the primary change was the refining of wording used in the document to improve clarity – this was always a requirement of the Standard, however previous wording caused confusion.</p>
<p>b. Rationale for the change:</p> <p>A VVB can only be accredited under SOCIALCARBON Standard if they have already demonstrated that they are accredited under ISO 14065 by an accreditation body that is a member of the International Accreditation Forum.</p>
<p>c. Where the change is reflected in the Programme’s documentation or other resource(s)⁴:</p> <p>Evidence - https://www.socialcarbon.org/s/SOCIALCARBON-Standard-Guide-v11-pnw7.pdf</p> <p>Section 5.</p>
<p>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:</p> <p>Original text: VVBs must be accredited via one of two pathways:</p> <ol style="list-style-type: none"> 1. Accredited under ISO 14065 by an SOCIALCARBON-approved accreditation body that is a member of the International Accreditation Forum (IAF). 2. Accredited under a SOCIALCARBON-approved GHG Program. Currently organizations approved as Designated Operational Entities (DOEs) under the UNFCCC’s Clean Development Mechanism are eligible. DOEs are accredited using the CDM Accreditation Standard which is based on ISO 14065.

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.

The update was made to increase clarity and demonstrate that all VVBs are accredited according to standards, procedures and requirements that are publicly disclosed.

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

The only modification is that of wording. The material impacts of this change have no direct impact on the Programme.

CHANGE 2

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

The ICAO Council requested that SOCIALCARBON completes the following action before being reconsidered for CORSIA eligibility:

- b) to put in place procedures ensuring the full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA;

This was already in place at the time of the initial review from TAB, however it may not have been made clear by our team. Where a loss event or a reversal occurs, the project shall comply with the rules for reporting a loss event and holding and cancelling credits set out in Section 5 of the SOCIALCARBON Registration and Issuance Requirements Document.

Page 32 of the SOCIALCARBON Registration and Issuance Requirements Document:

5.1.5 Where SOCIALCARBON determines that SCUs have been issued in excess of the correct amount, the following applies:

1. The project proponent is responsible for compensating for excess SCU issuance where SOCIALCARBON deems, acting reasonably, that there has been a material erroneous issuance of SCUs in respect of the project, as a result of the fraudulent conduct, negligence, intentional act, recklessness, misrepresentation or mistake of the project proponent, as set out further in the issuance representation.
2. Any compensation for excess SCU issuance shall be through the following, with SOCIALCARBON using reasonable efforts to work with the project proponent to ensure that any adverse impacts on the project proponent are minimised to the extent possible.
3. Where the excess SCUs remain in the project proponent’s SOCIALCARBON registry account and it can be demonstrated that they have not been used for offsetting purposes, immediate cancellation of the SCUs.
4. Replacement of SCUs through immediate cancellation from subsequent issuances of SCUs to the project.
5. Purchase by the project proponent of an equivalent number of replacement SCUs, and cancellation of same, within 60 business days of receiving formal SOCIALCARBON notification of such required action.
6. Where the project proponent fails to compensate for excess SCU issuance, SOCIALCARBON may take action against the project proponent, including applying sanctions with respect to its registry account activities until such time as the excess issuance has been compensated.

These procedures, coupled with our conservative approach to non-permanence risk ensures the full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA.

b. Rationale for the change:
N/A
c. Where the change is reflected in the Programme’s documentation or other resource(s) ⁵ :
Evidence - https://www.socialcarbon.org/s/SOCIALCARBON-Registration-and-Issuance-Process-v11.pdf
Section 5.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:
N/A
e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:
N/A

CHANGE 3
a. Description of the change (e.g., the addition, modification, deletion undertaken):
Addition to the SOCIALCARBON Registration and Issuance requirements: 3.1.14 Project Proponents are required to conduct due diligence on all landowners and stakeholders of their project. In doing so, they must provide evidence that none of the landowners or stakeholders pose a risk to Money Laundering or Terrorist Financing. Project Developers are required to align with industry best practice for KYC / KYB checks and must provide evidence to the SOCIALCARBON team that these checks have been completed. This evidence should be uploaded as ‘Confidential Documents’ on the registry. This evidence must provide sufficient details to enable the SOCIALCARBON team to conduct their own independent due diligence. If the SOCIALCARBON team deems a project to pose a risk to Money Laundering or Terrorist Financing, or any stakeholder is found to have a criminal record related to environmental abuses (e.g., illegal logging), the project will be delisted, and the project developer will be given a warning. Two warnings will result in the permanent banning of a project developer from using the SOCIALCARBON Standard.
b. Rationale for the change:
To improve the quality of project developer and protect both project developers and buyers from reputational and criminal implications associated with working with stakeholders that pose a risk to money laundering, reputational risk and terrorist financing.
c. Where the change is reflected in the Programme’s documentation or other resource(s) ⁶ :
Evidence - https://www.socialcarbon.org/s/SOCIALCARBON-Registration-and-Issuance-Process-v11.pdf
Section 3.1.14, pages 10 & 11

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.

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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:

This is a new addition to the requirements of the Standard. It has not material impact on the existing procedures reviewed by TAB beyond enhancing requirements for project development.

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:

This is a new addition to the requirements of the Standard. It has not material impact on the existing procedures reviewed by TAB beyond enhancing requirements for project development.

This requirement goes beyond current industry best practice.

CHANGE 4

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

The ICAO Council requested that SOCIALCARBON completes the following action before being reconsidered for CORSIA eligibility:

- c) to put in place procedures ensuring that REDD+ activities that are registered under the programme and expected to generate more than 7,000 emissions units/annum, individually or grouped, are implemented at national level, or on an interim basis on a subnational level.

SOCIALCARBON has not yet developed a REDD+ methodology – we are still deliberating internally whether to develop such a methodology and permit this project type. If we decide to develop a REDD+ methodology in the future we will ensure that emission baselines will, at a minimum, align with the jurisdictional level.

b. Rationale for the change:

N/A

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

N/A

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

N/A

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

N/A

CHANGE 5

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

a. Description of the change (e.g., the addition, modification, deletion undertaken):
An additional 6 methodologies have been developed and published since our application. SCM0002 - Methane emission reduction by adjusted water management practice in rice cultivation SCM0003 - Methodology for Carbon Removals in Private Conservation Areas SCM0004 - Methodology for the regeneration of Spekboom Thicket SCM0005 - Methodology for regenerative land management SCM0006 - Methodology for the Conservation of Areas of Biodiversity Importance SCM0007 - Methodology for the treatment of Harmful Algae Blooms
b. Rationale for the change:
These methodologies were developed to provide more robust and high quality procedures, backed by the latest scientific literature, for specific project activities, beyond what was already provided by the existing CDM methodologies.
c. Where the change is reflected in the Programme's documentation or other resource(s) ⁸ :
https://www.socialcarbon.org/methodologies
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:
These are GHG methodologies for specific project types and not changes to the general requirements / rules of the programme.
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
N/A

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