

## 4 TAB ASSESSMENT AND RECOMMENDATIONS ON APPLICATIONS AND PROCEDURAL UPDATES

### 4.1 GENERAL ELIGIBILITY PARAMETERS FOR CORSIA COMPLIANCE PERIODS

#### CORSIA first phase (2024-2026 compliance period)

4.1.1 At its 228<sup>th</sup> session in March 2023, the Council approved the general eligibility parameters for application in CORSIA's first phase (2024-2026 compliance period) (C-DEC 228/7), as recommended in section 4.1.2 of TAB's March 2023 report to Council. These general eligibility parameters apply to all CORSIA Eligible Emissions Units that are approved by the ICAO Council for use in the CORSIA first phase (2024-2026 compliance period), in addition to any programme-specific eligibility parameters recommended for a particular programme:

a) eligible for cancellation for use toward CORSIA offsetting requirements in the **2024-2026 compliance period** (hereafter *eligibility timeframe*); and

b) issued:

1) to activities that started their first crediting period from **1 January 2016**; and

2) in respect of emissions reductions that occurred **from 1 January 2021 through 31 December 2026**.

4.1.2 *Extension of unit date eligibility*: The date(s) in paragraph 4.1.1 above may only be extended to apply to eligibility timeframes beyond the CORSIA first phase (2024-2026 compliance period), and/or eligible unit dates after 31 December 2026, subject to the Council decision and TAB recommendations. In its 2025 re-assessment cycle, TAB will undertake re-assessments of programmes eligible at that time, in order to make recommendations to Council on the extension of their eligibility dates into the 2027-2029 compliance period. TAB may recommend such an extension to the Council where TAB's analysis identifies that an emissions unit programme is fully consistent with all of the EUC and guidelines when assessing the eligibility of emissions units with eligibility dates beyond 31 December 2026.

#### CORSIA pilot phase (2021-2023 compliance period)

4.1.3 At its 219<sup>th</sup> session in March 2020, the Council approved the general eligibility parameters for application in CORSIA's pilot phase (2021-2023 compliance period) (C-DEC 219/6), as recommended in section 4.1 of TAB's January 2021 report to Council. These general eligibility parameters apply to all CORSIA Eligible Emissions Units that are approved by the ICAO Council for use in the CORSIA pilot phase (2021-2023 compliance period), in addition to any programme-specific eligibility parameters recommended for a particular programme:

a) eligible for cancellation for use toward CORSIA offsetting requirements in the **2021-2023 compliance period** (hereafter *eligibility timeframe*); and

b) issued:

1) to activities that started their first crediting period from **1 January 2016**; and

2) in respect of emissions reductions that occurred **through 31 December 2020**.

4.1.4 *Extension of unit date eligibility*: The date(s) in paragraph 4.1.3 above may only be extended to apply to eligibility timeframes beyond the CORSIA pilot phase (2021-2023 compliance period), and/or

eligible unit dates after 31 December 2020, subject to the Council decision and TAB recommendations. TAB has recommended such extensions to the Council whenever TAB's analysis identified that an emissions unit programme is fully consistent with all of the EUC and guidelines when assessing the eligibility of emissions units with eligibility dates beyond 31 December 2020.

## **4.2 2023 TAB ASSESSMENT CYCLE: SUMMARY OF RECOMMENDATIONS**

4.2.1 In its 2023 assessment cycle, TAB assessed applications from organizations seeking to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period). In parallel, TAB assessed material changes submitted by programmes that are already fully or conditionally eligible for the pilot phase (2021-2023 compliance period). In accordance with the TAB Procedures, TAB is no longer inviting new applications for eligibility for the pilot phase only. However, where TAB recommends that Council approve a Programme as eligible for the first phase, TAB may also recommend that that the Programme be eligible to supply emissions units for the pilot phase, which has not yet elapsed.<sup>9</sup>

4.2.2 TAB's recommendations to Council from its 2023 assessment cycle are summarized in this section below. Section 4.3 then presents the full details of each recommendation, including any programme-specific eligibility parameters and further actions requested of each programme.

### **Eligibility for CORSIA first phase (2024-2026 compliance period)**

#### **4.2.3 Programmes recommended for immediate eligibility**

4.2.3.1 This TAB report is not recommending any additional programmes for approval to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period). All programmes that Council has already approved for this phase should continue to be eligible, in line with their existing parameters set out in section II of the ICAO document titled "CORSIA Eligible Emissions Units". TAB recommends that the ICAO Secretariat communicate the Criteria interpretation in section 4.4 of this report to the currently eligible programmes and that Council request them to take action as appropriate.

#### **4.2.4 Programmes recommended for conditional eligibility**

4.2.4.1 TAB recommends that the Council's designation of the following emissions unit programmes should be approved as conditionally eligible for the first phase (2024-2026 compliance cycle), pending the completion of further actions set out in section 4.3:

- BioCarbon Fund Initiative for Sustainable Forest Landscapes (see details in section 4.3.3)<sup>10</sup>
- Cercarbono (see details in section 4.3.4)<sup>10</sup>
- Forest Carbon Partnership Facility (see details in section 4.3.5)<sup>10</sup>
- Global Carbon Council (see details in section 4.3.6)<sup>11</sup>
- Premium Thailand Voluntary Emission Reduction Program (see details in section 4.3.7)<sup>10</sup>

4.2.4.2 All other programmes that Council had previously approved as conditionally eligible for the first phase remain subject to their existing eligibility conditions. TAB recommends that the ICAO secretariat communicate the Criteria interpretation in section 4.4 of this report to these programmes and that Council request them to take action as appropriate.

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<sup>9</sup> Paragraph 7.8 of the TAB Procedures sets out the three-year cycle for TAB assessments and re-assessments.

<sup>10</sup> These programmes are newly recommended as conditionally eligible in this report.

<sup>11</sup> This report recommends updating the programme's original eligibility conditions contained in TAB's January 2023 report to Council.

#### 4.2.5 **Programmes that TAB will continue to assess**

4.2.5.1 TAB initiated, but did not complete, a full assessment of the following emissions unit programme in respect of its eligibility for the first phase (2024-2026 compliance period):

- SOCIALCARBON (see details in Section 4.3.8)

#### 4.2.6 **Programmes invited to re-apply**

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

- BioCarbon Registry (see details in section 4.3.10)
- J-Credit (see details in section 4.3.11)

#### 4.2.7 **Applications not possible to assess**

4.2.7.1 TAB was unable to fully assess the following applicant organizations at this stage, due to either their early stage of development, or because key elements of an emissions unit programme, in line with the EUC and their guidelines, were not in place at the time of TAB's assessment:

- Carbonpath (see details in Section 4.3.13)
- International Carbon Registry (see details in Section 4.3.14)
- KCCI Carbon Standard (see details in Section 4.3.15)
- Riverse (see details in Section 4.3.16)

### **Eligibility for CORSIA pilot phase (2021-2023 compliance period)**

#### 4.2.8 **Programmes recommended for immediate eligibility**

4.2.8.1 In light of procedural updates submitted by the programmes during TAB's 2023 material change assessment cycle (MCA/2023), TAB recommends these programmes should now be approved to supply CORSIA Eligible Emissions Units for the pilot phase (2021-2023 compliance period), subject to the parameters set out in section 4.1.3:

- BioCarbon Fund Initiative for Sustainable Forest Landscapes (see details in section 4.3.19)
- SOCIALCARBON (see details in section 4.3.18)

### **4.3 2023 TAB ASSESSMENT CYCLE: DETAILED RECOMMENDATIONS**

#### **Assessments for the CORSIA first phase (2024-2026 compliance period)**

#### 4.3.1 **Programmes recommended for immediate eligibility**

4.3.1.1 This TAB report is not recommending any additional programmes for approval to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period). All programmes that Council has already approved for this phase should continue to be eligible, in line with their existing parameters set out in section II of the ICAO document titled "CORSIA Eligible Emissions Units". TAB recommends that the ICAO Secretariat communicate the Criteria interpretation in section 4.4 of this report to the currently eligible programmes and that Council request them to take action as appropriate.

#### 4.3.2 **Programmes recommended for conditional eligibility**

4.3.2.1 TAB recommends that the Council’s designation of the following emissions unit programmes should be approved as conditionally eligible for the first phase (2024-2026 compliance cycle), pending the completion of further actions set out in this section:

- BioCarbon Fund Initiative for Sustainable Forest Landscapes (see details in section 4.3.3)
- Cercarbono (see details in section 4.3.4)
- Forest Carbon Partnership Facility (see details in section 4.3.5)
- Global Carbon Council (see details in section 4.3.6)
- Premium Thailand Voluntary Emission Reduction Program (see details in section 4.3.7)

4.3.2.2 For clarity, TAB is not recommending that these programmes be approved to supply CORSIA Eligible Emissions Units at this stage (*i.e.*, immediately added to section II of the ICAO document “CORSIA Eligible Emissions Units”). Rather, TAB will confirm to Council when programme updates meet specified conditions; *then* the programme will be added to the ICAO document “CORSIA Eligible Emissions Units” for the first phase (2024-2026 compliance cycle).

#### 4.3.3 **BioCarbon Fund for Sustainable Forest Landscapes (ISFL) (for the CORSIA first phase)**

##### ***General findings***

4.3.3.1 TAB found that ISFL’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023 were largely consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards, pending the completion of the *Further actions requested of the programme* recommended in section 4.3.3.5 further down.

4.3.3.2 TAB found that ISFL demonstrated technical consistency with some, but not all, contents of the criterion Identification and tracking; Offset credit issuance and retirement procedures; and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.3.3.5 below.

4.3.3.3 TAB found several programmes rely on methodologies, processes and institutions, requirements, and/or tools from the Clean Development Mechanism (CDM) for programme elements relevant to the EUC. This common finding is discussed in a Criteria interpretation in section 4.4 further down and informed the *Further action requested of the programme* in section 4.3.3.5 (e).

4.3.3.4 TAB found that ISFL demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB’s interpretation that “conservative” means that procedures should provide for baselines that are set “in a conservative way *and below the business-as-usual emissions projections*”, following from TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB’s January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.3.6 (c).

### ***Further actions requested of the programme***

4.3.3.5 TAB recommends that the Council request ISFL to undertake the further actions described in para. (a) to (e) below, which ISFL is invited to submit for TAB to assess and make recommendations to Council as necessary to finalize the conditional eligibility of units issued under these programme elements:

- a) Update the public-facing view of the CATS registry to ensure that, for any jurisdictional programme that generates CORSIA-eligible units, the serial numbers for each batch of units that has been issued (including tradeable units that have not yet been cancelled) are displayed, and ensure that all programme documentation related to these units is easily accessible, including the relevant monitoring and verification reports,
- b) Update the ISFL procedures and the CATS registry system to clarify when and where the host country letters of attestation will be made publicly available,
- c) Establish procedures to address changes to the number, scale, and/or scope of host country attestations;
- d) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant guidelines, mindful of TAB's considerations and analysis contained in the document *Clarifications of TAB's Criteria interpretations*.<sup>12</sup>
- e) Put procedures in place for ISFL to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon.

4.3.3.6 TAB also recommends that the Council request ISFL to undertake these further actions, which do not need to be taken prior to updating ISFL description in the ICAO document titled "CORSIA Eligible Emissions Units":

- a) Ensure that the periodicity of security audits is clearly defined well before the CATS registry contains CORSIA-eligible units.
- b) Specify in ISFL programme documents that the maximum length of an ERPA phase is five years
- c) At the earliest opportunity, but no later than TAB's re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

### 4.3.4 **Cercarbono**

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<sup>12</sup> <https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/Clarifications.pdf>

## ***General findings***

4.3.4.1 TAB found that Cercarbono procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023 were fully consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards, pending the completion of the *Further actions requested of the programme* recommended in section 4.3.4.5 further down.

4.3.4.2 TAB found that *Cercarbono* demonstrated technical consistency with some, but not all, contents of the criterion Program governance; *Additionality; Avoidance of double counting, issuance and claiming; and Only counted once towards a mitigation obligation.* These findings informed the *Further actions requested of the programme* recommended in section 4.3.4.5 further down.

4.3.4.3 TAB found several programmes rely on methodologies, processes and institutions, requirements, and/or tools from the Clean Development Mechanism (CDM) for programme elements relevant to the EUC. This common finding is discussed in a Criteria interpretation in section 4.4 further down and informed the *Further action requested of the programme* in section 4.3.4.5 (c).

4.3.4.4 TAB found that *Cercarbono* demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way *and below the business-as-usual emissions projections*", following from TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB's January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.4.6 (a).

### ***Further actions requested of the programme***

4.3.4.5 TAB recommends that the Council requests *Cercarbono* to undertake the further actions in paragraphs (a) to (d) below, which *Cercarbono* is invited to submit for TAB to assess and make recommendations to the Council as necessary to finalize the conditional eligibility for the first phase of units issued under these programme elements:

- a) Put in place a complete plan for the long-term administration of multi-decadal programme elements, in particular for emissions units issued, held, and/or cancelled/retired on the registry and associated documentation of the activities and ownership, which includes possible responses to the dissolution of the programme in its current form;
- b) Clearly state in the *Cercarbono* standard and procedures that the programme's legal additionality requirements supersede any exemptions contained in methodologies or methodological standards in use by *Cercarbono*, such as for situations where legally binding mandates are systematically not enforced and/or non-compliance is widespread;
- c) Put procedures in place for *Cercarbono* to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon.

- d) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant guidelines, mindful of TAB's considerations and analysis contained in the document *Clarifications of TAB's Criteria interpretations*.<sup>13</sup>

4.3.4.6 TAB also recommends that the Council request Cercarbono to undertake these further actions, which do not need to be taken prior to updating Cercarbono description in the ICAO document titled "CORSIA Eligible Emissions Units":

- a) At the earliest opportunity, but no later than TAB's re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

#### 4.3.5 Forest Carbon Partnership Facility (FCPF)

##### *General findings*

4.3.5.1 TAB found that FCPF procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023 were largely consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards, pending the completion of the *Further actions requested of the programme* recommended in section 4.3.5.5 further down.

4.3.5.2 TAB found that FCPF demonstrated technical consistency with some, but not all, contents of the criterion Identification and tracking; Offset credit issuance and retirement procedures; and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.3.5.5 further down.

4.3.5.3 TAB found several programmes rely on methodologies, processes and institutions, requirements, and/or tools from the Clean Development Mechanism (CDM) for programme elements relevant to the EUC. This common finding is discussed in a Criteria interpretation in section 4.4 further down and informed the *Further action requested of the programme* in section 4.3.5.5 (e).

4.3.5.4 TAB found that FCPF demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way *and below the business-as-usual emissions projections*", following from TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB's January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.5.6 (b).

##### *Further actions requested of the programme*

4.3.5.5 TAB recommends that the Council request FCPF to undertake these further actions described in para. (a) to (e) below, which FCPF is invited to submit for TAB to assess and make recommendations to Council as necessary to finalize the conditional eligibility of units issued under these programme elements:

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<sup>13</sup> <https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/Clarifications.pdf>

- a) Update the public-facing view of the CATS registry to ensure that, for any jurisdictional programme that generates CORSIA-eligible units, the serial numbers for each batch of units that has been issued (including tradeable units that have not yet been cancelled) are displayed, and ensure that all programme documentation related to these units is easily accessible, including the relevant monitoring and verification reports,
- b) Update the FCPF procedures and the CATS registry system to clarify when and where the host country letters of attestation will be made publicly available,
- c) Establish procedures to address changes to the number, scale, and/or scope of host country attestations;
- d) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant guidelines, mindful of TAB's considerations and analysis contained in the document *Clarifications of TAB's Criteria interpretations*.<sup>14</sup>
- e) Put procedures in place for FCPF to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon

4.3.5.6 TAB also recommends that the Council request FCPF to undertake these further actions, which do not need to be taken prior to updating FCPF description in the ICAO document titled "CORSIA Eligible Emissions Units":

- a) Ensure that the periodicity of security audits is clearly defined well before the CATS registry contains CORSIA-eligible units,
- b) At the earliest opportunity, but no later than TAB's re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

#### 4.3.6 **Global Carbon Council (GCC)**

4.3.6.1 In March 2023, Council accepted TAB's recommendation that GCC should be conditionally eligible to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance cycle), pending the programme's implementation of further actions requested by the Council at that time.

4.3.6.2 In light of GCC's procedural updates submitted in April 2023 for assessment in TAB's 2023 material change assessment cycle (MCA/2023), TAB recommends that that Council update the *Further actions requested of the programme*, in light of progress that GCC has made in implementing the previously requested actions (Section 4.3.6.11 below).

#### ***Background on programme status***

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<sup>14</sup> <https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/Clarifications.pdf>



4.3.6.3 GCC first applied (as ‘Global Carbon Trust’) for assessment by the TAB in July 2019. In March 2020, the Council accepted TAB’s recommendation that the GCC should be conditionally eligible for pilot phase (2021-2023 compliance period), pending GCC’s implementation of further actions requested by the Council. Following TAB’s assessment of these further actions, Council approved TAB’s recommendation that GCC be fully eligible for the pilot phase in March 2021.

4.3.6.4 GCC applied for re-assessment by the TAB in March 2022. Council approved TAB’s recommendation that GCC be conditionally eligible for the first phase (2024-2026 compliance period) in March 2023, pending GCC’s implementation of further actions requested by the Council. As further explained in its January 2023 Report to Council,<sup>15</sup> TAB found that GCC demonstrated technical consistency with some, but not all, contents of the following criteria: Identification and tracking; Additionality; Quantified, monitored, reported and verified; and Only counted once towards a mitigation obligation.

4.3.6.5 Following this assessment, GCC was requested to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB’s review and recommendation and Council’s consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- a) Put procedures in place requiring that a re-evaluation of baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario, for any GCC activity that wishes to undergo verification but has not done so within an allowable number of years between verification events determined by the programme;
- b) Clearly state in the GCC Project Standard that ACCs shall not be eligible for the CORSIA first phase (2024-2026 compliance period) if issued to an activity that applies methodologies or methodological standards which allow any exemptions to legal additional requirements, such as in situations where legally binding mandates are systematically not enforced and/or non-compliance is widespread; and,
- c) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant Guidelines, mindful of TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement contained in the document *Clarifications of TAB’s Criteria interpretations*.<sup>16</sup> Further actions should address the following:
  - i. Review and, if necessary, update the registry CORSIA-Eligibility functionality in order to identify, for all CORSIA-eligible units with vintage years from 2021 onward, whether the corresponding adjustments have or have not yet been applied;
  - ii. Ensure that all references to the Article 6.2 Guidance would also cover related decisions adopted at UNFCCC COP27 and any relevant future decisions;
  - iii. Minimum specifications for the information to be provided in the host country letter of attestation, including the steps to be taken consistent with the Article 6.2 Guidance and the EUC and Guidelines to prevent double-claiming of mitigation by Aeroplane Operators and host country Nationally Determined Contributions; any limitations or parameters to the relevant authorizations; the relevant provisions of the Article 6.2 Guidance relating to a Party’s specified ‘trigger’ for first-transfers and the registry that the Party has, or to which it has access;

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<sup>15</sup> Paragraph 4.2.6.2 of Appendix B, C228.WP15473.

<sup>16</sup> <https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/Clarifications.pdf>

- iv. Publication of the host country letter of attestations in the GCC Registry entry for the relevant project(s)/activity(ies);
- v. Procedures for the programme to ensure that the information on host country attestations made public by programme is compared with the information on authorizations in national reports;
- vi. Procedures in place for the programme 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;
- vii. Put in place the procedures on amendments to the host country letter of attestation that were shared with TAB in draft form; and,
- viii. Ensure that the program, or proponents of the activities it supports, fully 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.

### ***Summary of material procedural updates***

4.3.6.6 In April 2023, GCC submitted draft updates (as “material changes”) to programme procedures designed to address the further actions requested by Council described in para 4.3.6.11 below.

### ***General findings***

4.3.6.7 TAB found that the GCC procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2022, supplemented by material changes submitted for TAB's assessment in April 2023, were largely consistent with the contents of the EUC as TAB applied them in its eligibility re-assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026, pending the completion of the *Further actions requested of the programme* recommended in section 4.3.6.11 further down.

4.3.6.8 This assessment was made on the basis of draft programme revisions shared in writing and discussed with TAB, which have been approved on a preliminary basis by GCC but are not yet available for use in an updated publicly available format of the programme procedures. TAB's assessment of the proposed procedures informed the *Further actions requested of the programme* recommended in section 4.3.6.11 further down. TAB did not, in the current assessment cycle, undertake any further assessment of the programme's application materials submitted under prior TAB assessment cycles.

4.3.6.9 TAB found several programmes rely on methodologies, processes and institutions, requirements, and/or tools from the Clean Development Mechanism (CDM) for programme elements relevant to the EUC. This common finding is discussed in a *Criteria interpretation* in section 4.4 further down and informed the *Further action requested of the programme* in section 4.3.6.11 (d).

### ***Areas for further development***

4.3.6.10 TAB found that GCC demonstrated technical consistency with some, but not all, contents of the following criteria: Identification and tracking; Carbon offset credits must be based on a realistic and credible baseline, and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.3.6.11 further down.

### ***Further actions requested of the programme***

4.3.6.11 TAB recommends that the Council requests GCC to undertake the further actions in paragraphs (a) to (d) below, which GCC is invited to submit for TAB to assess and make recommendations to the Council as necessary to finalize the conditional eligibility for the first phase of units issued under these programme elements. These requested further actions supersede the further actions requested by Council in March 2023 (see section 4.3.6.5 above):

- a) Update its programme standard and procedures to require, until GCC fulfills the condition in para. (b) below, that C+ and CA+ labels may only be applied to units with post-2020 vintages *after* GCC has verified that these specific units are fully reflected in the host country's biennial transparency report (BTR), following GCC's *Standard on Avoidance of Double Claiming of Mitigation Outcomes in Host Country NDCs* shared with TAB in draft form,
- b) If GCC wishes to be able to apply the C+ or CA+ label to ACCs *before* GCC has verified that they are fully and specifically reflected in the host country's biennial transparency report (BTR), enhance or replace sections 4.1 – 4.3 (buffer account guidelines) in the *Standard on Avoidance of Double Claiming of Mitigation Outcomes in Host Country NDCs* that was shared with TAB in draft form, in order to ensure that the program, or proponents of the activities it supports, fully compensate for, replace, or otherwise reconcile double-claimed mitigation associated with these units,
- c) Finalize and publish all other amendments to the *Standard on Avoidance of Double Claiming of Mitigation Outcomes in Host Country NDCs* that were shared with TAB in draft form, with further enhancements to address elements relating to para. (a) and (b) above,
- d) Put procedures in place for GCC to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon.

4.3.6.12 TAB also recommends that the Council request GCC to undertake the following further actions, which do not need to be taken prior to updating GCC's description in the ICAO document titled "CORSIA Eligible Emissions Units". These requested further actions supersede such actions requested by Council in March 2023 (see section 4.2.6.6 of the January 2023 TAB Report):

- a) At the earliest opportunity, update, or finalize updates to, the programme registry to enhance consistency with all requirements in the Emissions Unit Programme Registry Attestation, Part B, Paragraph 7.10, including for the registry to record cancellation information required in the CORSIA SARPs Appendix 5, Table A5-7<sup>17</sup>, through discrete, standardized fields in a downloadable and machine-readable format (e.g., XLS, CSV), that is available to public users at no cost and with no credentials required;
- b) Update the programme registry functionality to transparently label the specific CORSIA compliance period(s) for which units are CORSIA-eligible; and,

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<sup>17</sup> Required fields for reporting emissions unit cancellations: Aeroplane operator in whose name the unit was cancelled {name}; Compliance period {for which units were cancelled}; Quantity of units cancelled {in a given batch}; Start of serial number range {by batch}; End of serial number range {by batch}; Date of cancellation; Name of programme; Unit type {e.g., VER, CRT}; Host country; Methodology {alpha/numeric identifier}; Unit vintage {year}.

- c) At the earliest opportunity, but no later than TAB's re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

#### 4.3.7 Premium Thailand Voluntary Emission Reduction Program (Premium T-VER)

##### *General findings*

4.3.7.1 TAB found that the Premium T-VER procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023 were fully consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards, pending the completion of the *Further actions requested of the programme* recommended in section 4.3.7.5 further down.

4.3.7.2 TAB found that Premium T-VER demonstrated technical consistency with some, but not all, contents of the criterion Program governance; Transparency and public participation provisions; Identification and tracking; Carbon offset credits must be quantified, monitored, reported, and verified; Permanence; and Only counted once towards a mitigation obligation. These findings informed the Further actions requested of the programme recommended in section 4.3.7.5 further down.

4.3.7.3 TAB found several programmes rely on methodologies, processes and institutions, requirements, and/or tools from the Clean Development Mechanism (CDM) for programme elements relevant to the EUC. This common finding is discussed in a *Criteria interpretation* in section 4.4 further down and informed the *Further action requested of the programme* in section 4.3.7.6 (b).

4.3.7.4 TAB also found that Premium T-VER demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way and below the business-as-usual emissions projections", following from TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB's January 2023 Report to Council.

##### *Further actions requested of the programme*

4.3.7.5 TAB recommends that Premium T-VER undertake the further actions in paragraphs (a) to (e) below, which Premium T-VER is invited to submit for TAB to assess and make recommendations to the Council as necessary to finalize the conditional eligibility for the first phase of units issued under these programme elements:

- a) Put in place a complete plan for the long-term administration of multi-decadal programme elements, in particular for emissions units issued, held, and/or cancelled/retired on the registry and associated documentation of the activities and ownership, which includes possible responses to the dissolution of the programme in its current form;
- b) Formalize and disclose Premium T-VER's existing practices for what information is captured and made available to different stakeholders;
- c) Put procedures in place requiring that a re-evaluation of baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario, for any

Premium T-VER activity that wishes to undergo verification but has not done so within an allowable number of years between verification events determined by the programme;

- d) Enhance Premium T-VER non-permanence buffer credit management procedures to ensure that the programme will fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA, including in the event that the project developer defaults on its buffer pool obligations, ensuring that replacement units will also be from those eligible for use under the CORSIA;
- e) Further develop and formalize a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant Guidelines, mindful of TAB's considerations and analysis contained in the document *Clarifications of TAB's Criteria interpretations*. Further actions should address the following:
  - i. Formalize and disclose Premium T-VER's practices regarding host-country letters of attestation, including: (1) the minimum information required in such letters for activities generating CORSIA eligible units, and (2) where the letters of attestations will be published and related to the relevant activity's entries in the TGO registry;
  - ii. Establish and disclose the procedure for regularly comparing quantities of units in the TGO registry against reporting by the UNFCCC National Focal Point, in order to prevent any instances of double-claiming, and to report any discrepancies to ICAO; and,
  - iii. Establish and disclose procedures for Premium T-VER, or proponents of the activities it supports, to fully 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.

4.3.7.6 TAB also recommends that the Council request Premium T-VER to undertake these further actions, which do not need to be taken prior to updating Premium T-VER description in the ICAO document titled "CORSIA Eligible Emissions Units":

- a) At the earliest opportunity, update, or finalize updates to, the programme registry to enhance consistency with all requirements in the Emissions Unit Programme Registry Attestation, Part B, Paragraph 7.10, including for the registry to record cancellation information required in the CORSIA SARPs Appendix 5, Table A5-7<sup>18</sup>, through discrete, standardized fields in a downloadable and machine-readable format (e.g., XLS, CSV), that is available to public users at no cost and with no credentials required;
- b) Put procedures in place for Premium T-VER to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon.

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<sup>18</sup> Required fields for reporting emissions unit cancellations: Aeroplane operator in whose name the unit was cancelled {name}; Compliance period {for which units were cancelled}; Quantity of units cancelled {in a given batch}; Start of serial number range {by batch}; End of serial number range {by batch}; Date of cancellation; Name of programme; Unit type {e.g., VER, CRT}; Host country; Methodology {alpha/numeric identifier}; Unit vintage {year}.

#### 4.3.8 **Programmes that TAB will continue to assess**

4.3.8.1 TAB initiated, but did not complete, a full assessment of the following emissions unit programme in respect of its eligibility for the first phase (2024-2026 compliance period):

- SOCIALCARBON (see details in Section 4.3.8.2)

4.3.8.2 At this stage, TAB is not recommending this programme to be approved to supply CORSIA Eligible Emissions Units for the first phase (*i.e.*, immediately added to section II of the ICAO document “CORSIA Eligible Emissions Units”). Rather, TAB will continue to assess the programme’s procedures, including the latest updates presented to TAB in August 2023, will report its full recommendations to Council during its 231st session (March 2024).

4.3.8.3 In parallel, SOCIALCARBON submitted updated programme procedures (as “material changes”) in April 2023 designed to address the further actions requested by the 227th Council (November 2022) and to finalize SOCIALCARBON’s conditional eligibility to generate CORSIA Eligible Emissions Units for the pilot phase (2021-2023 compliance period). The findings of TAB’s material change assessment of SOCIALCARBON in respect of the pilot phase are described in section 4.3.18 further down.

#### 4.3.9 **Programmes invited to re-apply**

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

- BioCarbon Registry (see details in section 4.3.10)
- J-Credit (see details in section 4.3.11)

4.3.9.2 The specific findings by TAB in terms of criteria consistency and areas for further developments are provided in sections 4.3.10 and 4.3.11 further down. TAB will consider re-assessing these programmes 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.

#### 4.3.10 **BioCarbon Registry (BCR)**

##### *Criteria consistency*

4.3.10.1 TAB recommends that eligibility decisions regarding BCR should not be taken at this time. TAB found that BCR’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards.

4.3.10.2 TAB found that BCR demonstrated technical consistency with the contents of the following criteria: Legal nature and transfer of units; Transparency and public participation provisions; Sustainable development criteria; Do no net harm; Offset credit issuance and retirement procedures; Identification and tracking; Validation and verification procedures; Carbon offset credits must be quantified, monitored, reported, and verified; Clear and transparent chain of custody; Clear methodologies and protocols, and their development process; Scope considerations.

### *Areas for further development*

4.3.10.3 TAB found that BCR demonstrated technical consistency with some, but not all, contents of the following criteria: Program governance; Safeguards system; Permanence; Leakage; Avoidance of double counting, issuance and claiming; Additionality; Realistic and credible baselines, and Only counted once towards a mitigation obligation.

4.3.10.4 TAB would like to encourage BCR to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all of the EUC. TAB will assess the programme again once changes to the programme procedures are in place, corresponding to each criterion listed in para. 4.3.10.3 above, and the programme provides such information to TAB in line with a future call for applications.

### 4.3.11 **J-Credit**

#### *Criteria consistency*

4.3.11.1 TAB recommends that eligibility decisions regarding J-Credit should not be taken at this time. TAB found that J-Credit's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards.

4.3.11.2 TAB found that J-Credit demonstrated technical consistency with the contents of the following criteria: Legal nature and transfer of units; Transparency and public participation provisions; Offset credit issuance and retirement procedures; Validation and verification procedures; Clear and transparent chain of custody; Clear methodologies and protocols, and their development process; Scope considerations.

#### *Areas for further development*

4.3.11.3 TAB found that J-Credit demonstrated technical consistency with some, but not all, contents of the following criteria: Program governance; Safeguards system; Sustainable development criteria; Do no net harm; Identification and tracking; Carbon offset credits must be quantified, monitored, reported, and verified; Additionality; Permanence; Leakage; Avoidance of double counting, issuance and claiming and Only counted once towards a mitigation obligation.

4.3.11.4 TAB also found that J-Credit demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way *and below the business-as-usual emissions projections*", following from TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB's January 2023 Report to Council.

4.3.11.5 TAB would like to encourage J-Credit to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all of the EUC. TAB will assess the programme again once changes to the programme procedures are in place, corresponding to each criterion listed in para. 4.3.11.4 above, and the programme provides such information to TAB in line with a future call for applications.

#### 4.3.12 **Applicants not possible to assess**

4.3.12.1 TAB was unable to fully assess the following applicant organizations at this stage, due to either their early stage of development, or 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:

- CarbonPath (see details in Section 4.3.13)
- International Carbon Registry (see details in Section 4.3.14)
- KCCI Carbon Standard (see details in Section 4.3.15)
- Riverse (see details in Section 4.3.16)

#### 4.3.13 **CarbonPath**

##### *General findings*

4.3.13.1 TAB was unable to fully assess CarbonPath against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB's assessment. CarbonPath may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

#### 4.3.14 **International Carbon Registry (ICR)**

##### *General findings*

4.3.14.1 TAB was unable to fully assess ICR against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB's assessment. ICR may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

#### 4.3.15 **KCCI Carbon Standard (KCS)**

##### *General findings*

4.3.15.1 TAB was unable to fully assess KCS against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB's assessment. KCS may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

#### 4.3.16 **Riverse**

##### *General findings*

4.3.16.1 TAB was unable to fully assess Riverse against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB's assessment. Riverse may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

#### **Assessments for the CORSIA pilot phase (2021-2023 compliance period)**

#### 4.3.17 **Programmes recommended for immediate eligibility**



4.3.17.1 The following programmes were previously approved for conditional eligibility to supply CORSIA Eligible Emissions Units of the pilot phase (2021-2023 compliance period), pending the pending the programme’s implementation of further actions requested by the Council at that time. In light of procedural updates submitted by the programmes during TAB’s 2023 material change assessment cycle (MCA/2023), TAB recommends these programmes should now be approved to supply CORSIA Eligible Emissions Units for the pilot phase (2021-2023 compliance period):

- BioCarbon Fund Initiative for Sustainable Forest Landscapes (see details in section 4.3.19)
- SOCIALCARBON (see details in section 4.3.18)

4.3.17.2 The eligibility of the emissions units should be subject to the general eligibility parameters set out in Section 4.1 of TAB’s January 2020 Report to Council<sup>19</sup> and any programme-specific parameters set out for each programme in section[s] 4.3.18.7 below, which should be clearly described in section I of the ICAO document titled “CORSIA Eligible Emissions Units”.

#### 4.3.18 **BioCarbon Fund Initiative for Sustainable Forest Landscapes (ISFL)** (*for the CORSIA pilot phase*)

4.3.18.1 In light of ISFL’s procedural updates submitted in April 2023 for assessment in TAB’s 2023 material change assessment cycle (MCA/2023), TAB recommends that ISFL should be approved as immediately eligible to supply CORSIA eligible emissions units for the pilot phase. The eligibility of the emissions units should be subject to the general eligibility parameters set out in Section 4.1 of TAB’s January 2020 Report to Council (and reproduced in section 4.1.3 above) and the programme-specific parameters set out for the programme in paragraph 4.3.18.7 below, which should be clearly described in section I of the ICAO document titled “CORSIA Eligible Emissions Units”.

4.3.18.2 In parallel, ISFL also applied for assessment by the TAB for eligibility to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance cycle). The findings of TAB’s assessment in respect of that phase are described in section 4.3.3 above.

#### ***Background on programme status***

4.3.18.3 ISFL first applied for assessment by the TAB in April 2020. Following successive assessments by TAB, Council approved TAB’s recommendation that ISFL be conditionally eligible for the pilot phase (2021-2023 compliance period) in November 2022. As further explained in its September 2022 Report to Council,<sup>20</sup> TAB found that ISFL demonstrated technical consistency with some, but not all, contents of the criteria for Programme governance, Permanence and Are only counted once towards a mitigation obligation.

4.3.18.4 Following this assessment, ISFL was requested to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB’s review and recommendation and Council’s consideration, prior to Council finalizing its eligibility for the pilot phase (2021-2023 compliance period):

- a) to clearly state, in an update to its programme documentation, that units from an ISFL program can only be identified as CORSIA Eligible Emissions Units in the programme registry after ISFL approves the given program’s procedures for a Reversal Management Mechanism, including a periodic monitoring and third-party verification mechanism, based on their up-front and continued equivalence to the ER ISFL Buffer, according to 1) ISFL’s summary of proposed measures for determining this “equivalence”, and 2) the Mechanisms’ consistency with the procedures that ISFL

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<sup>19</sup> C219.WP15001

<sup>20</sup> Appendix B, C227.WP15451

conveyed to TAB in its application and all subsequent form(s) and communications with TAB, in respect of all EUC and Guidelines for Criteria Interpretations, with an emphasis on the following:

- Offset Credit Issuance and Retirement Procedures
- Identification and Tracking
- Validation and Verification procedures
- Quantified, monitored, reported, and verified
- Permanence
- Assess and mitigate incidences of material leakage
- Are only counted once towards a mitigation obligation

### ***Summary of material procedural updates***

4.3.18.5 On 30 March 2023, ISFL submitted updated programme procedures (as “material changes”) to programme procedures designed to address the remaining further actions requested by Council. These procedures would apply to all of the Carbon Fund’s recipient jurisdictional programmes that wish to seek CORSIA eligibility. TAB also sought to confirm the full functioning of the programme-designated registry and its availability for use.

### ***General findings***

4.3.18.6 TAB found that the ISFL procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2022, supplemented by material changes submitted for TAB’s assessment in April 2023, were largely consistent with the contents of the EUC as TAB applied them for the pilot phase (2021-2023 compliance cycle), for emissions units generated under the programme prior to 1 January 2021 that are within the programme-specific eligibility parameters noted in Section 4.3.18.7 below.

### ***Programme specific eligibility parameters***

4.3.18.7 ISFL submitted for TAB’s assessment all activity types and scales, unit types, methodologies, and procedural categories supported by ISFL, supplemented by material changes to programme procedures assessed under TAB’s 2023 material change assessment cycle (MCA/2023). The programme’s eligibility scope described in section I of the ICAO document titled “CORSIA Eligible Emissions Units” should reflect the exclusions in paragraph (a) below. TAB does not, at this time, recommend any further exclusions from or limitations to the programme’s scope of eligibility, beyond those set out in the general eligibility parameters in Section 4.1 of TAB’s January 2020 report to Council and in these programme-specific eligibility parameters, which include:

a) the exclusion of all emissions units issued to programs that do not have in place a Reversal Management Mechanism, including a Periodic Monitoring and Third-Party Verification Mechanism, that ISFL approves as demonstrating up-front and continued equivalence to the ER Program CF Buffer through at least 31 December 2037 and ideally longer, according to 1) ISFL’s summary of measures for determining this “equivalence”, and 2) the Mechanisms’ consistency with the procedures that ISFL conveyed to TAB in its application and all subsequent form(s) and communications with TAB, in respect of all EUC and Guidelines for Criteria Interpretations, with an emphasis on the following:

- Offset Credit Issuance and Retirement Procedures
- Identification and Tracking
- Validation and Verification procedures

- Quantified, monitored, reported, and verified
- Permanence
- Assess and mitigate incidences of material leakage
- Are only counted once towards a mitigation obligation

***Further actions requested of the programme***

4.3.18.8 Further actions requested of ISFL are described in section 4.3.3.5 above.

4.3.19 **SOCIALCARBON** (for the CORSIA pilot phase)

4.3.19.1 In light of SOCIALCARBON procedural updates submitted in April 2023 for assessment in TAB’s 2023 material change assessment cycle (MCA/2023), TAB recommends that SOCIALCARBON should now be approved as immediately eligible to supply CORSIA eligible emissions units for the pilot phase. The eligibility of the emissions units should be subject to the general eligibility parameters set out in Section 4.1 of TAB’s January 2020 Report to Council<sup>21</sup> and the programme-specific parameters set out for the programme in paragraph 4.1.3 of this report, which should be clearly described in section I of the ICAO document titled “CORSIA Eligible Emissions Units”.

4.3.19.2 In parallel, SOCIALCARBON also applied for assessment by the TAB for eligibility to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance cycle). Section 4.3.8 above provides an update on TAB’s progress in assessing SOCIALCARBON in respect of that phase.

***Background on programme status***

4.3.19.3 SOCIALCARBON first applied for assessment by the TAB on 28 February 2022. Following assessment by TAB, Council approved TAB’s recommendation that SOCIALCARBON be conditionally eligible for the pilot phase (2021-2023 compliance period) in November 2022. As further explained in its September 2022 Report to Council,<sup>22</sup> TAB found that SOCIALCARBON demonstrated technical consistency with some, but not all, contents of the criteria for Validation and Verification procedures; Permanence; Leakage and Are only counted once towards a mitigation obligation.

4.3.19.4 Following this assessment, SOCIALCARBON was requested to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB’s review and recommendation and Council’s consideration, prior to Council finalizing its eligibility for the pilot phase (2021-2023 compliance period):

- 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;
- 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;
- 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.

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<sup>21</sup> C219.WP15001

<sup>22</sup> C227.WP15451, Appendix B, section 4.1.6.

### *Summary of material procedural updates*

4.3.19.5 In April 2023, SOCIALCARBON submitted updated programme procedures (as “material changes”) to programme procedures designed to address the further actions requested by Council described in paragraph (a) in section 4.3.19.4 above. SOCIALCARBON also provided information about its programme procedures in reference to paragraphs (b) and (c) and reported additional procedural updates that TAB determined are not material changes as defined in paragraph 7.3 of the TAB Procedures.

### *General findings*

4.3.19.6 TAB found that the SOCIALCARBON procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2022, supplemented by material changes submitted for TAB’s assessment in April 2023, were largely consistent with the contents of the EUC as TAB applied them for the pilot phase (2021-2023 compliance cycle), for emissions units generated under the programme prior to 1 January 2021 that are within the programme-specific eligibility parameters noted in Section 4.3.19.7 below.

### *Programme specific eligibility parameters*

4.3.19.7 SOCIALCARBON submitted for TAB’s assessment, some, but not all activity types and scales, unit types, methodologies, and procedural categories supported by SOCIALCARBON, supplemented by material changes to programme procedures assessed under TAB’s 2023 material change assessment cycle (MCA/2023). The programme’s eligibility scope to be described in section I of the ICAO document titled “*CORSIA Eligible Emissions Units*” should reflect the exclusions in paragraph (a) below. TAB does not, at this time, recommend any further exclusions from or limitations to the programme’s scope of eligibility, beyond those set out in the general eligibility parameters in Section 4.1 of TAB’s 2020 Report to Council and in these programme-specific eligibility parameters, which include:

- a) Exclusion of SCUs issued to activities in the following categories:
  - a. Agriculture, forestry and other land use (AFOLU), **with the following allowable exceptions**: SCM0002 (methane emission reduction in rice cultivation),
  - b. Carbon capture and storage
  - c. Water

## 4.4 CRITERIA INTERPRETATIONS

4.4.1 The following discussions were undertaken by TAB Members in order to agree on interpretations of a criterion or its guidelines, in order to find consensus on TAB recommendations, including those presented in Section 4 of this report. Where TAB discussed and agreed to specific interpretations in order to apply a criterion or its guidelines to the wide variety of programmes assessed, this section also presents those interpretations.

4.4.2 In its 2023 assessment cycle, TAB reaffirmed the relevance of Criteria interpretations in successive TAB Reports, which are compiled into a document titled *Clarifications of TAB’s Criteria Interpretations Contained in TAB Reports* and published on the TAB website for transparency. Reflecting on this work, TAB noted with appreciation that programmes continue to make progress in enhancing their procedures to bring them more clearly in line with the EUC. TAB looks forward to reviewing this continuing progress during its forthcoming assessment cycles.

**Criteria: Validation and verification procedures; Carbon offset credits must be quantified, monitored, reported, and verified; Clear methodologies and protocols, and their development process; Additionality; Realistic and credible baselines; and Leakage.**

4.4.3 TAB noted that several emissions unit programmes incorporate activity methodologies, requirements, and/or tools developed under the Clean Development Mechanism (CDM), and/or draw on approaches from the CDM to develop their own distinct programme elements. The degree of reliance varies widely by programme or applicant organization: while some have little or no reference to the CDM in their standards and procedures, others have incorporated some or all CDM methodologies and tools and have used them in some or all their registered activities.

4.4.4 TAB recalled the outcomes of the Glasgow Climate Conference (UNFCCC COP 26 / CMP 16 / CMA 3) and subsequent work under the Paris Agreement regarding the transition of CDM activities and methodologies for use in the Article 6.4 mechanism. These outcomes state that CDM activities may continue to apply their current approved CDM methodologies until the earlier of the end of their current crediting periods or 31 December 2025, following which they must apply an approved methodology from the Article 6.4 mechanism.<sup>23</sup> CMA 3 also requested the Article 6.4 Supervisory Body to, among other things, review existing CDM methodologies, accreditation standards and tools with a view to applying them with revisions, as appropriate, and/or developing similar tools under the new mechanism.<sup>24</sup> At a future session, the CMP will determine a timeline for the end of the operation of the processes under the CDM and its institutions, with a view to avoiding a gap before the operationalization of the corresponding processes under the Article 6.4 mechanism.<sup>25</sup>

4.4.5 TAB discussed the possibility that some emissions unit programmes might continue to rely on CDM programme elements that will no longer be maintained under the UNFCCC process. This could affect those programmes' ability to demonstrate technical consistency with some or all the following criteria: Validation and verification procedures; Carbon offset credits must be quantified, monitored, reported, and verified; Clear methodologies and protocols, and their development process; Additionality; Realistic and credible baselines; and Leakage.

4.4.6 Reflecting on this possibility, TAB noted that programmes using CDM elements should (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon. TAB also noted that programmes that rely on CDM methodologies, processes and institutions, requirements, and/or tools should have procedures in place on items (1) to (3) above prior to becoming eligible to generate emissions units for the CORSIA first phase (2024-2026 compliance period).

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<sup>23</sup> UNFCCC Decision 3/CMA.3, Annex para. 73(a).

<sup>24</sup> UNFCCC Decision 3/CMA.3, para. 5.

<sup>25</sup> UNFCCC Decision 2/CMP.17, paras. 6 and 13.