

**International Civil Aviation Organization (ICAO) Carbon Offsetting and Reduction
Scheme for International Aviation (CORSA)**

**Application Form for Emissions Unit Programmes
seeking eligibility to supply units to
the CORSA 2027 – 2029 compliance period**

(Version 2, January 2026)

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SECTION I: ABOUT THE ASSESSMENT OF APPLICATIONS

Background

ICAO Member States and the aviation industry are implementing the Carbon Offsetting and Reduction Scheme for International Aviation (CORSA). Together with other mitigation measures, CORSA will help achieve international aviation's aspirational goal of carbon neutral growth from the year 2020. Aeroplane operators will meet their offsetting requirements under CORSA by purchasing and cancelling CORSA eligible emissions units. The ICAO Council determines CORSA eligible emissions units upon recommendations by its Technical Advisory Body (TAB) and consistent with the CORSA Emissions Unit Eligibility Criteria (EUC).

In March 2019, the ICAO Council unanimously approved the ICAO Document *CORSA Emissions Unit Eligibility Criteria* for use by TAB in undertaking its tasks¹. TAB's assessment of emissions unit programmes is undertaken annually². The results of ICAO Council decisions that take account of these recommendations are contained in the ICAO Document *CORSA Eligible Emissions Units*³. At present, eight Emissions Unit Programmes are eligible to supply CORSA-eligible Emissions Units for the 2024-2026 compliance period (the CORSA 'first phase') and four programmes are eligible to supply CORSA-eligible Emissions Units for the 2027-2029 compliance period (part of CORSA 'second phase'). The latter programmes are eligible to certify CORSA Eligible Emissions Units for the 2024-2026 compliance period and were approved by the ICAO Council to do so for the 2027-2029 period based on TAB's 2025 reassessment and recommendations.

ICAO now invites emissions unit programmes⁴ to apply to TAB's 2026 assessment cycle, which will make recommendations on their eligibility to supply CORSA-Eligible Emissions Units for the **2027-2029 compliance period** (part of the CORSA 'second phase'). Any interested programme should provide the updated information requested through this application form and its Appendices, as well as supplementary materials and evidence as applicable. In undertaking this work, TAB may also ask programmes to provide specific examples illustrating how programme procedures or systems perform in practice.

This assessment will be conducted during TAB's 2026 annual assessment cycle, according to the TAB Terms of Reference, TAB Procedures, Work Programme and Timeline, which are available on the ICAO TAB website.

About this form

Programme responses to this application form will serve as the primary basis for the assessment. This form requests

¹ Available on the ICAO CORSA website: <https://www.icao.int/environmental-protection/CORSA/Pages/CORSA-Emissions-Units.aspx>

² Recommendations from 2019 TAB assessment cycle: <https://www.icao.int/CORSA/icao-corsia-tab2019>

Recommendations from 2020 TAB assessment cycle: <https://www.icao.int/icao-corsia-tab2020>

Recommendations from 2021 assessment cycle: <https://www.icao.int/CORSA/icao-corsia-tab2021>

Recommendations from 2022 assessment cycle: <https://www.icao.int/CORSA/icao-corsia-tab2022>

Recommendations from 2023 assessment cycle: <https://www.icao.int/CORSA/TAB2023>

Recommendations from 2024 assessment cycle: <https://www.icao.int/CORSA/TAB2024>

³ Available on the ICAO CORSA website: <https://www.icao.int/environmental-protection/CORSA/Pages/CORSA-Emissions-Units.aspx>

⁴ "Emissions Unit Programme", for the purposes of TAB's assessment, refers to an organization that administers standards and procedures for developing activities that generate offsets, and for verifying and "issuing" offsets created by those activities. For more information, please review the TAB FAQs on the ICAO CORSA website: <https://www.icao.int/CORSA/icao-corsia-tab>

evidence of programme procedures or programme elements. The evidentiary documentation enables TAB to a) confirm that a given procedure or programme element is *in place*, b) more fully understand the programme’s summary responses, and c) archive the information as a reference for potential future assessments. TAB’s assessment may also involve, *e.g.*, a completeness check and initial screening of applications, written clarification questions, and/or live interview(s) with programmes.

This Application form is accompanied by, and refers to, [Appendix A “Supplementary Information for Assessment of Emissions Unit Programmes”](#), containing the EUC and *Guidelines for Criteria Interpretation*. The ICAO Council, on recommendation of its Committee on Aviation Environmental Protection (CAEP), updated the *Guidelines for Criteria Interpretation* in March 2024. These EUC and updated Guidelines are provided to inform programmes’ completion of this Application form, in which they are cross-referenced by paragraph number.⁵

This form is also accompanied by [Appendix B “Programme Assessment Scope”](#), and [Appendix C “Programme Exclusions Scope”](#), which request all applicants to identify the programme elements⁶ they wish to submit for, or exclude from, TAB’s assessment.

CORSIA Eligible Emissions Unit Programmes must also complete [Appendix D](#) of this Application form, “*Emissions Unit Programme Registry Attestation*”⁷ in line with the instructions contained in that Appendix. Applicant organizations are strongly encouraged to submit this information by the deadline for submitting all other application materials for the current assessment cycle.

Translation: As was done previously, if the programme documents and information are not published in English, the programme should fully describe in English (*rather than summarize*) this information in the fields provided in this form, and in response to any additional questions. Where this form requests *evidence of programme procedures*, programmes are strongly encouraged to provide English translations of these documents, to facilitate a complete and accurate understanding. Where this is not possible due to time constraints or document length, the programme may provide such documents in their original language in a readily translatable format (*e.g.*, Microsoft Word). Those programmes that need to translate documents prior to submission may contact the ICAO Secretariat regarding accommodation.

Information provided in this form continues to be used following a decision by ICAO Council to approve an emissions unit programme for CORSIA eligibility. TAB’s recommendations on the extent and limits of a programme’s eligibility are developed on the basis of TAB’s assessment of the information that the programme provided in its application materials, as well as any updates or clarifications that the programme communicates to TAB during the course of its assessment. This information is used by Council to define the general and/or programme-specific eligibility parameters set out in the ICAO Document titled “CORSIA Eligible Emissions Units.” Eligible programmes agree to maintain consistency with the EUC in the manner described in the application form and in any communications with TAB. This includes maintaining, *e.g.*, any procedures; requirements;

⁵ For further information on how TAB interprets the EUC in light of the *Guidelines*, refer to the document Clarifications of TAB’s Criteria Interpretations Contained in TAB Reports available on the ICAO TAB website https://www.icao.int/sites/default/files/environmental-protection/CORSIA/Documents/TAB/Clarifications_Nov-2025.pdf

⁶ At the “activity type” level (*e.g.*, sector(s), sub-sector(s), and/or project “type(s)”)

⁷ See discussion regarding the Registry Attestation from Section 4.4.3 in *TAB Report – August 2025*—found on page 2 of the document *Clarifications of TAB’s Criteria Interpretations Contained in TAB Reports*: https://www.icao.int/sites/default/files/environmental-protection/CORSIA/Documents/TAB/Clarifications_Nov-2025.pdf

standards; specific methodologies and tools (methodological, or for risk assessment, or for risk management); operating agreements; electronic tracking systems and their linkages (e.g., registries, data transfer arrangements, service agreements); governance procedures; organizational/legal documentation; or changes to eligibility scope such as programme-initiated unit invalidation and/or revocation that would alter the information described to and/or shared with TAB during the programme’s assessment.

Following the submission of an application form and during a TAB assessment cycle, applicants are requested to inform TAB of any developments that could alter the information provided in their initial application, including any updates that are in development or pending approval. This includes developments related to procedures or systems that could include but are not limited to the examples provided in the previous paragraph. Such developments should be summarized in an email to the ICAO secretariat, which will be circulated to TAB members. Following an eligibility determination by the ICAO Council, CORSIA eligible emissions unit programmes must disclose such developments using the Material Change Notification Form in accordance with TAB Procedures⁸ and applicable deadlines. Failure to provide accurate information during the initial assessment, or to inform of changes to that information in a timely manner, could give rise to an Eligibility Deviation⁹, including the possible revocation of any eligibility that was granted.

Disclaimer: The information contained in the Application form, and any supporting evidence or clarification provided by the programme including information designated as “business confidential” by the programme, will be provided to the members of the TAB to properly assess the programme and make recommendations to the ICAO Council. The application and such other evidence or clarification will be made publicly available on the ICAO CORSIA website for the public to provide comments, except for information which the applicant designates as “business confidential”. Public comments received during that period, including commenter names and organizations, are published following their review by TAB. In accordance with section 9.4 of the TAB Procedures, all comments that meet the submission guidelines are published as received and Programme responses to public comments are not published on the ICAO website. The applicant shall bear all expenses related to the collection of information for the preparation of the application, preparation and submission of the application to the ICAO Secretariat and provision of any subsequent clarification sought by the Secretariat and/or the members of the TAB. Under no circumstances shall ICAO be responsible for the reimbursement of such or any other expenses borne by the applicant in this regard, or any loss or damages that the applicant may incur in relation to the assessment and outcome of this process.

⁸ See paragraph 7.3 and footnote 3, paragraphs 8.5-8.6, 8.10-8.11, and 10.6 of TAB Procedures: https://www.icao.int/sites/default/files/environmental-protection/CORSIA/Documents/TAB/TAB_Procedures_v7_Jan2025.pdf

⁹ See Section 10 of TAB Procedures: https://www.icao.int/sites/default/files/environmental-protection/CORSIA/Documents/TAB/TAB_Procedures_v7_Jan2025.pdf

SECTION II: INSTRUCTIONS

Submission and contacts

A programme is invited to complete and submit the Application form, including accompanying evidence and with required appendices, through the ICAO CORSIA website no later than close of business on **9 March 2026** via **TAB@icao.int**. Within seven business days of receiving this form, the Secretariat will notify the programme that its form was received.

If the programme has questions regarding the completion of this form, please contact ICAO Secretariat via email: **TAB@icao.int**. Programmes will be informed, in a timely manner, of clarifications provided by ICAO to any other programme.

Form basis and cross-references

Questions in this form are derived from the CORSIA emissions unit eligibility criteria (EUC) and the *Guidelines for Criteria Interpretation*. Each question includes the paragraph number for its corresponding criterion or guideline that can be found in [Appendix A “Supplementary Information for Assessment of Emissions Unit Programmes”](#). Compared to previous (Re-)application forms, TAB has adjusted the order and contents of the questions in light of the ICAO Council’s March 2024 decision to update the *Guidelines for Criteria Interpretation*.

Application Form completion

The programme is expected to respond to all questions in this application form at the time of submission. TAB cannot initiate its assessment unless this information is provided in full as requested. Failure to provide complete information may result in delays to the assessment process.

A “complete” response involves three components: 1) a written summary response, 2) supporting evidence, and 3) any planned programme revisions.

- 1) **Written summary responses**: The programme is encouraged to construct written summary responses in a manner that provides for general understanding of the given programme procedure, independent of supporting evidence. TAB will confirm each response in the supplementary evidence provided by the programme. Please note that written summary responses should be provided in all cases—supporting evidence (described in 2 below) should not be considered as an alternative to a complete summary response.
- 2) **Supporting evidence**: Most questions in this form request *evidence of programme procedures or programme elements*. Such evidence may be found in excerpts or quotations of programme standards, requirements, or guidance documents; templates; programme website or registry contents; or in some cases, in specific methodologies. To help manage file size, the programme should limit supporting documentation to that which directly substantiates the programme’s statements in this form.

Programmes are expected to provide such evidence, along with the written summary response, in the following ways:

- a) copying/pasting the relevant excerpts or quotations of programme documentation directly into this form (no character limits);
- b) web links to the sources of these excerpts or quotations and any supporting documentation, with instructions for finding the relevant information within the linked source (i.e. identifying the specific text, paragraph(s), or section(s) where TAB can find evidence of the programme procedure(s) in question);
- c) if needed, attaching supporting documentation to this form at the time of submission, with instructions for finding the relevant information within the attached document(s);

EXAMPLE of preferred approach to providing supporting evidence that could meet expectations for complete responses to a question:

“The Programme ensures its consistency with this requirement by requiring / undertaking / etc. the following:

[*Summary response*: Paragraph(s) introducing and summarizing specific programme procedures that are relevant to the question]

[*Evidence*: Quotes/excerpts of the relevant provisions in the programme’s procedures, with citations]

The full contents of these procedures can be found in [Document title, page X, Section X, paragraphs X-X]. This document is publicly available at this weblink: [weblink].”

3) **Planned programme revisions**: Where the programme has any plans to revise the programme (e.g., its policies, procedures, measures, tracking systems, governance or legal arrangements), including to enhance consistency with a given criterion or guideline, please provide the following information in response to any and all relevant form question(s):

- a) Planned revision(s);
- b) Process and expected timeline to develop and implement the proposed revision(s);
- c) Process and timeline for external communication and implementation of the revision(s).

Scope of application

The programme may elect to submit for TAB assessment all, *or only a subset*, of the activities supported by the programme. The programme is requested to identify, in the following Appendices, the activities that it wishes to submit for, or exclude from, TAB’s assessment:

In [Appendix B “Programme Assessment Scope”](#), the programme should clearly identify, at the “activity type” level (e.g., sector(s), sub-sector(s), and/or programme/project “type(s)”), elements that the programme *is submitting for TAB’s assessment* of CORSIA eligibility; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements; which *are* described in this form.

In [Appendix C “Programme Exclusions Scope”](#), the programme should clearly identify, at the “activity type” level

(e.g., sector(s), sub-sector(s), and/or programme/project “type(s)”), any elements the programme *is not submitting for TAB’s assessment* of CORSIA eligibility, which *are not* described in this form; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements.

In [Appendix D “Emissions Unit Programme Registry Attestation”](#), the programme should update and re-submit the *Registry Attestation*, if any information therein has changed since it last submitted the Registry Attestation. If no information has changed, the programme may elect to re-submit its previous Registry Attestation form.

Treatment of EUC-relevant programme procedures at the methodology level

Programmes that identify with the following explanations are encouraged to summarize and provide evidence of both their overarching *programme-level* procedure(s) and *methodology-level* procedure(s) wherever relevant:

The CORSIA EUC and TAB assessments typically apply to *programme-level* procedures rather than to individual methodologies or projects. Most programmes’ overarching guidance documents contain a mix of *general/guiding* requirements and *technical* ones. However, some programmes set out general requirements in overarching guidance documents, while reflecting key technical procedures in programme methodologies¹⁰. **Such methodologies may be relevant to TAB’s assessment.** This could be the case where, e.g., the methodologies are developed directly by the programme (staff or contractors); the programme must refer to a methodology’s requirements when describing its alignment with the EUC; and/or the programme’s general requirements alone are too high-level/non-specific for TAB to assess them as stand-alone procedures.

EXAMPLE: Programme A’s project standard contains its *programme-level* general requirements. The standard requires all activities to pass a programme-approved additionality test. However, Programme A sets out a unique list of approved tests in each of its methodologies—rather than providing a single list or menu in its programme-level standard. These lists vary across different activity types or category(ies). Thus, TAB may ultimately need to assess Programme A’s programme- *and* methodology-level requirements in order to confirm its use of the specific additionality tests called for under the *Must be Additional* criterion.

“Linked” certification schemes

This application form should be completed and submitted exclusively on behalf of the programme that is described in Part I of this form.

Some programmes may supplement their standards by collaborating with other schemes that certify, e.g., the social or ecological “co-benefits” of mitigation. The programme can reflect a linked scheme’s procedures in responses to this form, where this is seen as enhancing—i.e., going “above and beyond”—the programme’s own procedures. For example, the programme may describe how a linked scheme audits sustainable development outcomes; but is not expected to report the linked scheme’s board members or staff persons. Programmes should clearly identify any information provided in this form that pertains to a linked certification scheme and/or only applies when a linked certification scheme is used.

¹⁰ Note that any applicant may use different terminology. For example, a programme may refer to a “methodology” as a protocol or framework.

Disclosure of programme application forms and public comments

Application materials, including information submitted in Appendices B, C, and D, as well as other information submitted by applicants will be publicly available on the ICAO CORSIA website, except for materials which the applicants designate as ‘business confidential’.

The public will be invited to submit comments on the information submitted, including regarding consistency with the emissions unit criteria (EUC), through the ICAO CORSIA website, for consideration by the TAB in its assessment. All public comments that meet the submission guidelines are published as received and Programme responses to public comments are not published on the ICAO website.

SECTION III: APPLICATION FORM

General information

A. Programme Information

Programme name: BCarbon, Inc.

Administering Organization¹¹: BCarbon, Inc.

Official mailing address: 4709 Austin Street, Houston, Texas, 77004

Telephone #: + 1 281-682-5511

Official web address: bcarbon.org

B. Programme Administrator Information

Full name and title: Eric Unverzagt, Chief Executive Officer

Employer / Company (*if not programme*): BCarbon, Inc.

E-mail address: eric.unverzagt@bcarbon.org

Telephone #: +1 281-682-5511

C. Programme Representative Information (if different from Programme Administrator)

Full name and title: Guido Bertola, Technical Director

Employer / Company (*if not Programme*): BCarbon, Inc.

E-mail address: guido.bartola@bcarbon.org

Telephone #: +1 346-638-3415

D. Programme Senior Staff / Leadership (e.g., President / CEO, board members)

List the names and titles of programme's senior staff / leadership, including board members:

Board Members

James B. Blackburn, Founder and Chairman of the Board of Directors

Joe Swinbank, Treasurer of Board of Directors

Brooke Harris, Secretary of Board of Directors

¹¹ Name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme, *if different from "Programme Name"*.

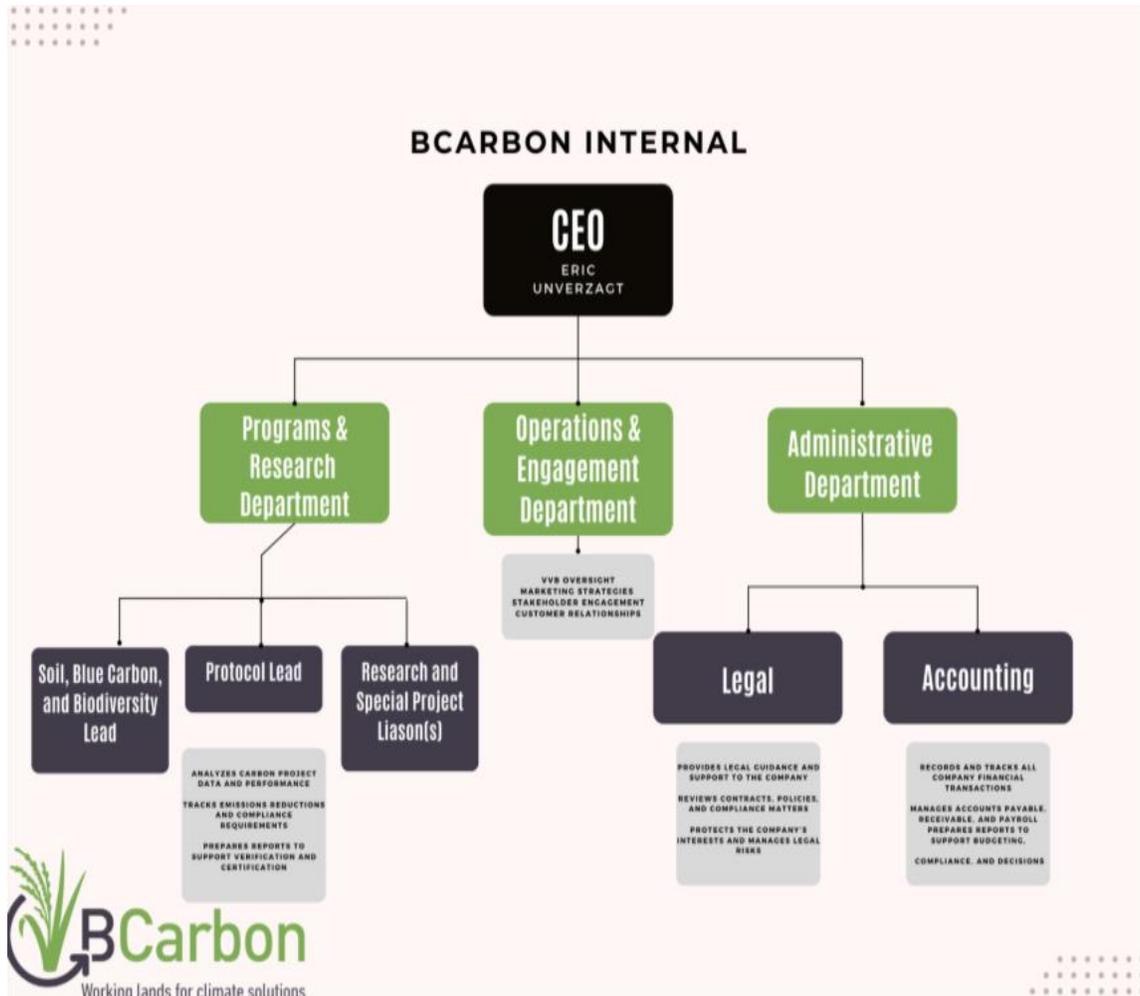
Joni Carswell, Board Member
Jane Stricker Board Member
Jose Beceiro, Board Member
Pam Giblin, Board Member,
Susan Combs, Board Member
Nick Rodriguez, Board Member
Christopher Davies, Board Member.

Senior Staff

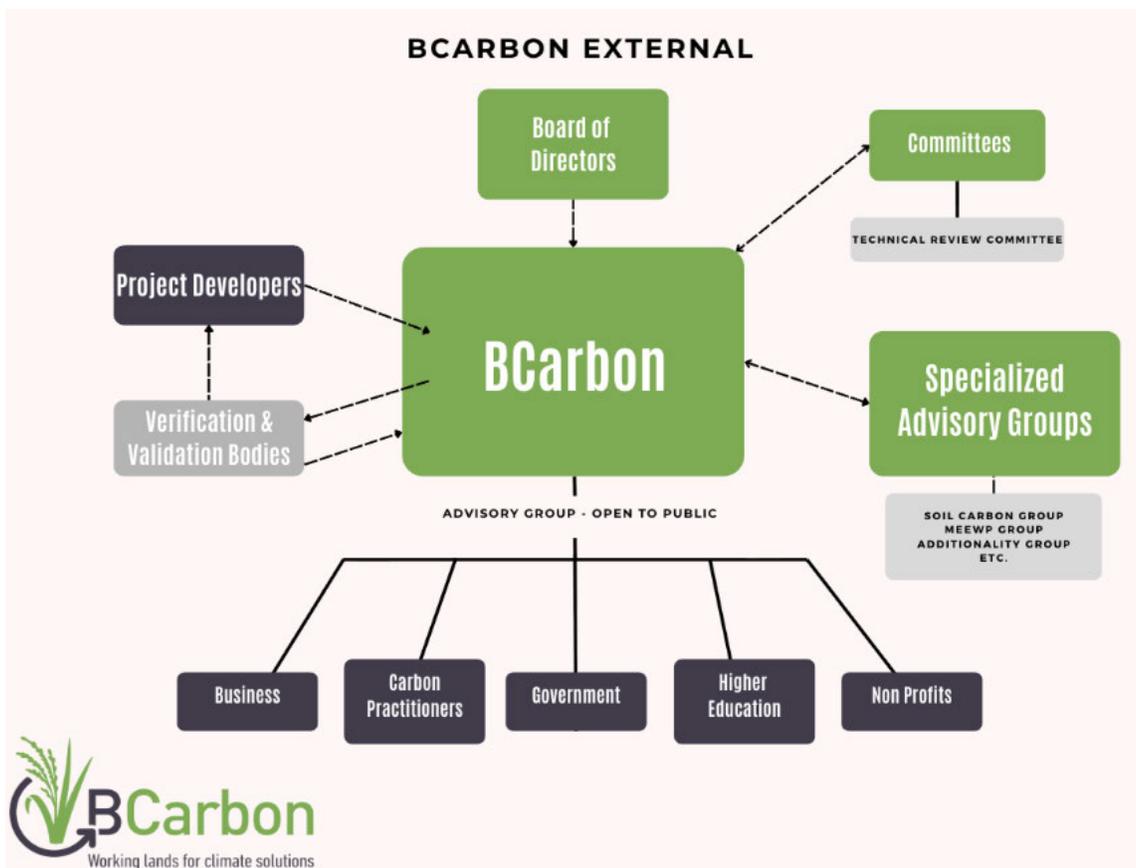
Guido Bertola, Technical Director
Madison Romo, Operations and Engagement Coordinator
Swetha Sridhar, Soil and Forest Carbon Project Analyst
Lalise Mason, Coastal Design and Blue Carbon Project Analyst
Chris Ordonez BCarbon/Rice University Liaison
Garland Kerr, Accounting and Administrative Department
Hope Trevino, Accounting and Administrative Department
Bryan French, General Counsel
Juan Esparza, Legal Assistant.

Provide an organization chart (in the space below or as an attachment) that illustrates, or otherwise describes, the functional relationship a) between the individuals listed in D; and b) between those individuals and programme staff / employees; and c) the functions of each organizational unit and interlinkages with other units.

BCarbon Internal Organization Chart



BCarbon External Organizational Chart



1. Executive Leadership, CEO (Eric Unverzagt)

- Provides overall strategic direction, operational leadership, and final decision-making authority for the organization.

2. Programs & Research Department

- **Primary Function:** Development, research, and advancement of specific carbon project methodologies and related initiatives. This includes government grants, private grants, and other collaborative projects with BCarbon.
- **Staff & Responsibilities:**
 - **Soil & Biodiversity Program Lead** Heads soil programs and forestry initiatives this includes conducting biodiversity research; managing agrivoltaics project; and leading the Soil Carbon Credit program.
 - **Blue Carbon Research Lead:** Oversees and directs research initiatives focused on blue carbon ecosystems, including mangroves, seagrasses, and salt marshes. Responsibilities include designing and implementing studies to quantify carbon sequestration, developing methodologies for carbon project validation, analyzing environmental and climate data, and providing scientific guidance for the development of the Blue Carbon program.
 - **Protocol Development and Project Analytics Lead:** Oversees the development, analysis, and advancement of carbon credit programs and protocols. Responsibilities include leading the Methane Credit Program, supporting the Soil Carbon Program, and conducting research, updates,

and protocol development to ensure alignment with Core Carbon Principles. The role also involves analyzing carbon project data and performance, maintaining records to support verification and certification, and tracking program achievements. Additional duties include leading marketing and buyer cultivation efforts, and supporting initiatives such as A&M Climate Smart, Silicon Ranch, and biodiversity research projects.

- **Research & Special Projects Liaisons:** Serves as the primary coordinator and point of contact for high-impact projects across multiple sectors. Responsibilities include managing collaborations with higher education institutions, prominent industry-leading businesses, and international initiatives, in areas including, but not limited to, sports sustainability, forestry initiatives, and other nature-based solutions. The role involves facilitating communication between stakeholders, overseeing project logistics, ensuring alignment with organizational goals, and supporting strategic objectives to drive innovation and deliver measurable impact.

3. Operations & Engagement Department

- **Primary Function:** Execution and management of core programs, fundraising, and day-to-day functions.
- **Staff & Responsibilities:**
 - **Program Operations and Engagement Coordinator:** Supervises the planning, coordination, and execution of organizational programs and operational initiatives to ensure efficient delivery and stakeholder engagement. Responsibilities include managing day-to-day program logistics, maintaining communication with partners and participants, tracking deliverables, and assisting with reporting and evaluation. The role also involves supporting cross-departmental operations, fostering collaboration among internal teams, and engaging with external stakeholders to promote program visibility and impact.
 - **Fundraising:** Managed under Operations & Engagement Coordinator

4. Administrative Department

- **Primary Function:** Management of legal, financial, and contractual obligations to ensure organizational stability and compliance.
- **Staff & Responsibilities:**
 - **General Counsel:** Develops and negotiates contracts; conducts legal and policy research; tracks application fees.

Questionnaire

Note—where “evidence” is requested in *Part 1* through *Part 5*, the programme is expected to provide quotes/excerpts and web links to documentation and to identify the specific text, paragraph(s), or section(s) where TAB can find evidence of the programme procedure(s) in question. If that is not possible, then the programme may provide evidence of programme procedures directly in the text boxes provided (by copying/pasting the relevant provisions in full) and/or by attached supporting documentation, as recommended in “SECTION II: INSTRUCTIONS—*Form Completion: Supporting Evidence*”.

Note—“*Paragraph X.X*” in this form refers to corresponding paragraph(s) in Appendix A “Supplementary Information for Assessment of Emissions Unit Programmes”.

Note—Where the programme has any plans to revise the programme (e.g., its policies, procedures, measures, tracking systems, governance or legal arrangements), including to enhance consistency with a given criterion or guideline, provide the following information in response to any and all relevant form question(s):

- Proposed revision(s);
- Process and proposed timeline to develop and implement the proposed revision(s);
- Process and timeline for external communication and implementation of the revision(s).

PART 1: Governance and Safeguards: Sustainable Development Criteria; Do no net harm; Safeguards System; Transparency and Public Participation Provisions; Governance; Legal Nature and Transfer of Units

Criterion: Legal nature and transfer of units

Q1: Does the Program... (<i>Paragraph 2.5</i>)	
(a) ...define and ensure the underlying attributes of a unit?	<input checked="" type="checkbox"/> YES
(b) ... and publicly disclose process by which it does so?	<input checked="" type="checkbox"/> YES
(c) ...define and ensure the property aspects of a unit?	<input checked="" type="checkbox"/> YES
(d) ... and publicly disclose process by which it does so?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the processes, policies, and/or procedures referred to in a) and d), including their availability to the public:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

(a) BCarbon defines and ensures the underlying attributes and property aspects of the units it issues. Specifically, the underlying attributes of a BCarbon Credit are defined by the purpose and scope of the BCarbon Credit and Issuance Standard which states ” The purpose of this Credit and Issuance Standard is to define the principles, requirements, and procedures for the quantification, monitoring, reporting, validation, and verification of greenhouse gas (GHG) emission reductions and removals for projects registered under the BCarbon system. This

standard ensures the environmental integrity of BCarbon credits by requiring that they are real, measurable, additional, permanent, and conservatively estimated, in alignment with the principles of ISO 14064-3.” This Standard is upheld throughout BCarbon’s Carbon Crediting and Certification Projects.

(b) BCarbon publicly discloses the processes by which it defines and ensures the underlying attributes of a unit through the publicly available BCarbon Credit and Issuance Standard.

(c) With respect to property aspects, the publicly available BCarbon Registry Definition defines an Instrument (Carbon Credit) Verified Carbon Unit (VCU) as “a carbon credit unit issued by and held in the BCarbon registry that represents the right of an Account Holder in whose Account the unit is recorded to claim the achievement represented by the Instrument. Such achievement may include but is not limited to a GHG emission Mitigation in the amount of one (1) metric tonne of CO2 equivalent that has been Verified and or Validated in accordance with the applicable BCarbon requirements as well as any operational documents BCarbon requires under the relevant protocol. Recordation of an instrument in the holders account at the BCarbon Registry is evidence of that Account Holder’s entitlement to that instrument.”

The BCarbon registry records all projects and programs (listed and registered) and carbon credits issued under the BCarbon Program. It provides public access to all project, program and BCarbon Credit information, including retirement and tracking of carbon credits and jurisdictional pooled buffer accounts, and provides project proponents with the ability to list and register projects and programs, and issue, hold and retire BCarbon Credits.

(d) BCarbon publicly discloses the processes by which it defines and ensures the property aspects of a unit. Link to BCarbon Credit and Issuance Standard here: [BCarbon Credit and Issuance Standard.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):
 BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Credit and Issuance Standard for review or slated for review and expected completion in Q3 of 2026.

Criterion: Programme governance

Q2. Does the programme publicly disclose... (Paragraph 2.7)	
a) ...who is responsible for the administration of the programme?	<input checked="" type="checkbox"/> YES
b) ...how decisions are made?	<input checked="" type="checkbox"/> YES

Provide evidence that this information is available to the public:
 This document is publicly available here: [QMS Framework \(Governance and Operational Procedures\).pdf](#) and soon to be published and available on the BCarbon Website.

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):
 BCarbon publicly discloses responsibility for program administration through its Quality Management System

(QMS) and associated governance documentation. The QMS identifies the governing and operational bodies responsible for program administration, including the Board of Directors, Chief Executive Officer (CEO), and designated operational departments. Roles, responsibilities, and delegated authorities for protocol development, project certification, registry administration, validation and verification oversight, and quality assurance are clearly defined and documented.

BCarbon publicly discloses its decision-making processes through its publicly available Quality Management System (QMS) and supporting governance documents. These materials describe how decisions are initiated, reviewed, approved, and implemented, including the roles of technical committees, stakeholder consultations, executive leadership, and the Board of Directors. Decision-making authority, approval thresholds, escalation pathways, and oversight mechanisms are explicitly documented and aligned with BCarbon’s Bylaws and governance framework.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon QMS Framework (Governance and Operational Procedures for review or slated for review and expected completion in Q3 of 2026.

Q3. If the programme is not directly and currently administered by a public agency, can the programme demonstrate up-to-date professional liability insurance policy of at least USD\$5M? (Paragraph 2.7.4)	<input type="checkbox"/> YES
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Provide evidence of such coverage:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon carries and has carried out professional liability insurance since 2020. Currently this policy has limitations of \$1 million per occurrence and \$2 million in aggregate per year. However, BCarbon is exploring increasing this coverage to \$5 million.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon is exploring increasing this coverage to \$5 million in 2026.

Q4. Can the programme demonstrate that it has been... (Paragraph 2.7.2)	
a) ...continuously governed for at least the last two years?	<input checked="" type="checkbox"/> YES
b) ...continuously operational ¹² for at least the last two years?	<input checked="" type="checkbox"/> YES

Provide evidence of the activities, policies, and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon has operated under continuous governance since its formal establishment as an independent nonprofit organization in 2020. The program originated in 2019 at Rice University’s Baker Institute for Public Policy, where

¹² Note: For further explanation of the meaning of ‘operational’ for the purposes of the EUC and TAB’s assessments, please note para. 2.7.2.1 of Appendix A of this Application form, as well as the Initial screening questions in section 7.12 of the TAB Procedures.

a dedicated working group identified the need for innovative approaches to soil carbon sequestration and voluntary carbon markets. Following incorporation, BCarbon has maintained uninterrupted governance through its Board of Directors and executive leadership, operating in accordance with its Bylaws, governance responsibilities, fiduciary oversight, and program supervision have been consistently exercised for over the past two years.

b) BCarbon has been continuously operational since its establishment, administering carbon credit programs, developing and updating protocols, overseeing validation and verification activities, maintaining its registry, and engaging stakeholders for over two years. Program operations are conducted in accordance with BCarbon’s publicly available standards, protocols, and QMS procedures, ensuring operational continuity and transparency.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):
N/A

Q5. Does the programme have in place... (Paragraph 2.7.2)	
a) ...a plan for the long-term administration of multi-decadal programme elements?	<input checked="" type="checkbox"/> YES
b) ...a plan for possible responses to the dissolution of the programme in its current form?	<input checked="" type="checkbox"/> YES

Provide evidence of the activities, policies, and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon’s soon to be publicly available Quality Management System ([QMS Framework \(Governance and Operational Procedures\).pdf](#)) provides for the long-term administration of multi-decadal program elements, including permanence obligations, crediting periods, monitoring and reporting requirements, buffer pool management, and post-crediting oversight. Long-term program resilience is further supported by Carbon’s institutional relationships, including its continued collaboration with Rice University’s Baker Institute, and by structured stakeholder engagement mechanisms such as the BCarbon Advisory Group (the ”BAG”). The BAG, comprising more than 800 contributors from diverse backgrounds, provides ongoing technical input, market insight, and feedback that supports adaptive management over extended time horizons. BCarbon’s predecessor of the BAG, the Working Stakeholder Group, has maintained records of its meetings and now those of the BAG since July 2022. The website includes summaries from all of these regularly held meetings, requests for stakeholder and public comments, white papers and protocol announcements. The link to the webpage is: <https://bcarbon.substack.com/>

b) BCarbon’s governance and risk management framework includes provisions for organizational continuity, risk mitigation, and contingency planning. Oversight and authority in the event of organizational change or dissolution rest with the Board of Directors, consistent with fiduciary obligations under applicable nonprofit law. Document control, recordkeeping, transparency, and stakeholder engagement processes are designed to safeguard program records, credit integrity, and public accountability. BCarbon’s strong institutional foundations, broad stakeholder base, and embedded public engagement through the BCarbon Advisory Group further support orderly transition planning, should it ever be required.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon QMS Framework (Governance and Operational Procedures for review or slated for review and expected completion in Q3 of 2026.

Criteria: Multiple (re: Conflicts of interest)

Q6. Are policies and robust procedures in place ¹³ to... (Paragraph 2.7.3)	
a) ... prevent the programme administrators, staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of programme services?	<input checked="" type="checkbox"/> YES
b) ...ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) Individuals involved with BCarbon, including Board Members, staff, advisors, consultants, contractors and VVBs are required to sign a stand-alone Conflict of Interest Statement, or another agreement in which a conflict-of-interest provision is included. These provisions are critical in documenting their commitment to maintaining objectivity in their respective roles and tasks. Documentation of these statements is duly recorded and maintained by BCarbon’s management system. BCarbon regularly monitors these statements and encourages the reporting of conflicts in order that it may investigate potential conflicts—both actual and perceived— investigate and take appropriate action based on established conflict-of-interest procedures.

b) BCarbon’s Conflict-of-Interest Policy for the Board of Directors was begun in 2022, and in 2025 incorporated staff members, consultants, contractors and VVBs. Evidence that BCarbon has collected and maintained conflict-of-interest statements from the Board of Directors and staff may be provided upon ICROA’s request.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

N/A

Q7. Are policies and robust procedures in place ¹¹ to... (Paragraph 2.4.6)	
a) ...prevent the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services?	<input checked="" type="checkbox"/> YES
b) ...ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon is committed to upholding the highest standards of objectivity and impartiality in its programs and

¹³ Note: For programmes staffed solely by government officials and employees who are subject to domestic laws and regulations governing conflicts of interest, the programme may refer to these laws and regulations in responding to this question.

with the ability of an employee or Associate to make sound, independent business decisions on BCarbon's behalf. This Policy is intended to supplement but not replace any applicable state and federal law governing conflicts of interests applicable to nonprofit and charitable organizations.

This Policy applies to all employees and Associates of BCarbon and its subsidiaries. Contractors, members of verification and validation bodies, and members of BCarbon's Board of Directors must also comply with this Conflict-of-Interest Policy."

b) Article IV, Procedures for Addressing the Conflict of Interest BCarbon details the following steps for addressing conflicts of interest.

**"Article IV.
Procedures for Addressing the Conflict of Interest**

The potential Conflict will be addressed as provided in this Section 4.

4.1. Presentation. An Interested Person may make a presentation during staff meetings, subcommittee meetings and stakeholder meetings, but shall disclose the potential conflict, and after the presentation shall depart from any meeting during which the project, transaction, or arrangement is discussed, and shall not take part in any decision regarding the project, transaction or arrangement involving the possible Conflict of Interest.

4.2. Investigation. The Corporation's CEO or General Counsel shall investigate alternatives to the proposed transaction or arrangement or, if appropriate, appoint a disinterested person to investigate the proposed transaction or arrangement.

4.3. Determination. After exercising due diligence, the CEO, General Counsel or appointed disinterested person shall determine whether the Corporation can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a Conflict of Interest.

4.4. Alternative Consideration. The CEO, General Counsel or disinterested person shall consider whether a more advantageous transaction or arrangement is reasonably possible under circumstances that would not produce a conflict of interest. The officer shall determine whether the transaction or arrangement is in the Corporation's best interest, and it is beneficial, fair, and reasonable to pursue. As a result of its investigation and considerations, the Corporation shall determine whether to proceed with the proposed transaction or arrangement."

c) BCarbon's Conflict of Interest statement, Article III Duty to Disclose; Determination addresses the step for isolating individuals with a possible conflict of Interest. 3.2 Determining the Existence of a Conflict of Interest states:

"After disclosure of the nature of the Conflict of Interest and all related material facts, and after a discussion with the Interested Person, that person must separate from all contact with the project and persons implicating the Conflict of Interest while a review of the facts is conducted by Corporation and a determination is made whether a Conflict of Interest does in fact exist."

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

N/A

Criterion: Transparency and public participation provisions

Q9. Does the programme publicly disclose what information is captured and made available to different stakeholders? (<i>Paragraph 2.8</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon publicly discloses what information is captured and made available to different stakeholders through its website and open communications channels. This includes draft and finalized protocols, summaries of proposed and approved changes, identified affected sections, version histories, and archived prior versions. Records of stakeholder and public comments, along with BCarbon’s written responses and rationales, are also published. Additionally, policies and procedures (such as VVB policy, local consultation policy, etc.) are available to all stakeholders on the website or upon request. Technical information of projects that have received carbon credits is also available on the BCarbon registry (<https://bcarbon.changecode.io/>), and BCarbon discloses what information will be made available to project developers on the specific certification agreements. Contributors, Specialized Advisory Groups, independent experts, and the general public are provided access to relevant information according to their role, and governance outcomes are communicated transparently via public postings, email, meetings, and other open forums.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

New updates will be made quarterly as necessary in accordance with our internal governance rules of the Technical Review Committee.

Q10. Does the programme publicly disclose its local stakeholder consultation requirements (if applicable)? (<i>Paragraph 2.8</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon publicly discloses its stakeholder consultation requirements at the program level. Participation in BCarbon’s contributor community, including the BCarbon Advisory Group and Specialized Advisory Groups, is open to the public, voluntary, and free of charge. All minor and major protocol revisions are subject to a minimum 30-day public consultation period during which any interested stakeholder may submit feedback. Where local or project-level stakeholder consultation requirements apply, these are addressed and disclosed within the relevant individual protocols.

Project developers are also required to conduct Local Consultation processes in accordance with the Local and Public Consultation Standard, which is publicly available [on our website](#).

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

N/A

Q11. Does the programme.... (Paragraph 2.8)	
a) ... conduct public comment periods for the following (select all that apply)? <input checked="" type="checkbox"/> methodologies, protocols, or frameworks under development <input type="checkbox"/> activities seeking registration or approval <input checked="" type="checkbox"/> operational activities (e.g., ongoing stakeholder feedback) <input checked="" type="checkbox"/> additions or revisions to programme procedures or rulesets	<input type="checkbox"/> YES
b) ... disclose its public comments provisions and requirements?	<input checked="" type="checkbox"/> YES
c) ... disclose how public comments are considered (if applicable)?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the procedures referred to in items a) through c):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon conducts public comment periods for methodologies, protocols, and frameworks under development. Draft documents and proposed revisions are published on BCarbon’s website and released for a minimum 30-day public consultation period. During this time, contributors and members of the public are invited to submit written comments, which are reviewed and considered through BCarbon’s formal governance and technical review processes prior to final approval and publication.

BCarbon does not conduct public comment periods for individual activities or projects seeking registration or approval. Project-level applications are evaluated through BCarbon’s internal review processes and independent validation and verification procedures to ensure compliance with approved protocols, rather than through public consultation. BCarbon maintains ongoing mechanisms for stakeholder engagement and feedback on its operational activities. Stakeholders may provide feedback through open contributor participation, Advisory Group discussions, and written submissions. Operational feedback that may affect program implementation or integrity is reviewed internally and, where relevant, may trigger protocol updates or procedural revisions that are subsequently subject to public consultation.

BCarbon conducts public comment periods for some additions or revisions to program procedures or rulesets, such as the Additionality Framework. Proposed changes are released for public consultation, typically for a minimum of 30 days, and comments received are reviewed, documented, and addressed prior to final approval. Finalized updates are published on BCarbon’s website along with records of comments and responses to ensure transparency and accountability.

b) BCarbon publicly discloses its public comment provisions, including how comments are submitted, reviewed, and considered. Draft protocol revisions are published for a minimum 30-day public consultation period.

c) All comments received are reviewed by BCarbon staff and, where appropriate, by Specialized Advisory Groups and independent technical experts. For major revisions, multiple rounds of review may occur. BCarbon documents the rationale for accepting or rejecting comments and publishes a record of comments and responses alongside the finalized protocol, ensuring transparency and traceability in decision-making.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

N/A

Criteria: Safeguards system and Do no net harm

Q12. Does the Programme <u>have in place</u> dedicated safeguards to address... (Paragraph 2.9)	
a) ...environmental risks?	<input checked="" type="checkbox"/> YES
b) ...social risks?	<input checked="" type="checkbox"/> YES
c) Are these safeguards publicly disclosed?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the safeguards referred to in a) and c), including their availability to the public:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon maintains safeguards addressing environmental risks through its environmental and social safeguards framework. Project developers must demonstrate that proposed projects will not cause adverse environmental impacts, including impacts on air quality, water quality, endangered species, or natural resource protection. Developers are required to identify, assess, and manage environmental risks that may arise throughout the project lifecycle, including both short term and long-term impacts. To operationalize these safeguards, developers must complete a Safeguards Systems Assessment Form, which requires identification of potential environmental risks, monitoring systems to measure those risks, and mitigation or management measures. If a project is determined to cause significant negative environmental impacts, BCarbon may deny the issuance of credits.

b) BCarbon also maintains safeguards addressing social risks. Projects must demonstrate that activities respect human rights and consider impacts on Indigenous peoples and local communities, children, people in vulnerable situations, gender equality, and intergenerational equity. Through the Safeguards Systems Assessment Form, project developers must identify potential social risks, describe monitoring procedures, and outline prevention and mitigation measures to manage those risks during the project lifecycle.

c) The safeguard requirements, procedures, and supporting documentation will be publicly disclosed through BCarbon’s Environmental and Social Impacts documentation and associated protocol materials. These materials will be available on the BCarbon website and explain the safeguard framework and the requirement for developers to complete the Safeguards Systems Assessment Form as part of project documentation and oversight. These safeguards are publicly available here: [BCarbon Environmental and Social Risk Assessment Policy.pdf](#), [Safeguards Systems Assessment Form - Sheet1.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Environmental and Social Risk Assessment Policy and the Safeguards Systems Assessment Form for review or slated for review and expected completion in Q3 of 2026.

Q13. Please describe, and provide evidence of, how the safeguards system in Question 12 above is used to ensure that environmental and social risks are identified, assessed and managed: (Paragraph 3.8)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon implements its environmental and social safeguards through a structured Safeguards Systems Assessment Form, which project developers must complete as part of project documentation and oversight. The form requires developers to identify potential environmental and social risks by describing specific impacts, whether they are short or long term, the affected groups or environmental resources, and an assessment of both the likelihood and severity of each risk using a standardized scoring scale. Developers must also describe procedures for measuring and monitoring risks throughout the project duration, including the monitoring method and frequency. In addition, the form requires detailed risk mitigation and management measures, including prevention measures, mitigation actions, and emergency response procedures to address identified risks. The form also requires confirmation of implementation status and signatures from responsible parties to ensure accountability. Completion of the Safeguards Systems Assessment Form is mandatory, and incomplete submissions will result in a noncompliance review that may lead to withholding credit issuance or discontinuation of a project. Through this process of risk identification, monitoring, mitigation planning, and formal review, BCarbon ensures that environmental and social risks are identified, assessed, and managed in accordance with its safeguard requirements.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Safeguards Systems Assessment Form for review or slated for review and expected completion in Q3 of 2026.

Q14. Does the programme have in place... (<i>Paragraph 3.8</i>)	
a) ... institutions, processes, and procedures to implement, monitor, and enforce the environmental and social safeguards?	<input checked="" type="checkbox"/> YES
b) Are these institutions, processes, and procedures publicly disclosed?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the institutions, processes and procedures referred to in a) above, including their public disclosure:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon implements its environmental and social safeguards through defined program procedures and project documentation requirements. Project developers must complete a Safeguards Systems Assessment Form, which requires the identification of environmental and social risks, evaluation of the likelihood and severity of those risks, and documentation of monitoring, prevention, mitigation, and emergency response measures. The form also requires developers to describe how risks will be monitored during the project lifecycle and to confirm implementation status. These submissions are reviewed as part of project oversight, and insufficient or incomplete information will result in corrective action and noncompliance review.

b) The institutions, procedures, and documentation used to implement and enforce these safeguards will be publicly available through BCarbon’s program materials and safeguard documentation, including the Safeguards Systems Assessment Form and related guidance.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Environmental and

Social Risk Assessment Policy and the Safeguards Systems Assessment Form for review or slated for review and expected completion in Q3 of 2026.

Q15. Are procedures in place to ensure that offset projects do not violate local, state/provincial, national or international regulations or obligations? (<i>Paragraph 3.8</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon complies with all relevant laws and regulations related to nonprofit businesses in Texas and the United States. BCarbon maintains an excellent public reputation in Texas where it has been registered as a nonprofit corporation since 2020 and as a 501(C)(3) non-profit corporation as determined by the United States Internal Revenue Service in 2021. Upon request, BCarbon may furnish a statement from the IRS to affirm BCarbon’s standing.

BCarbon Developers Certification Agreements contain a compliance with the law provision, as well as an attestation clause that states that that all information submitted to BCarbon by the Project Developer is correct and true at the time of the Application.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

N/A

Criterion: Sustainable development criteria

Q16. Does the programme use sustainable development criteria? (<i>Paragraph 2.10</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

All projects listed under BCarbon’s program contribute to SDG 13: Climate Action, as their primary objective is the mitigation of greenhouse gas emissions or the enhancement of carbon sequestration. By generating verified carbon credits through climate mitigation activities, BCarbon projects support global efforts to address climate change.

Certain project types also contribute to additional Sustainable Development Goals. Projects developed under BCarbon’s methane emissions elimination and well plugging framework support SDG 7: Affordable and Clean Energy, while land-based sequestration projects such as forest, soil and living shoreline initiatives typically contribute to SDG 14: Life Below Water and SDG 15: Life on Land through ecosystem and land stewardship benefits.

BCarbon also encourages project developers to disclose additional SDG contributions through project co-benefits.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

A publicly available document outlining SDG linkages across BCarbon project types is planned for release following review and approval by the BCarbon Technical Review Committee in Q3 of 2026.

<p>Q17. Does the programme have in place and publicly disclose procedures that identify a list or menu or potential sustainable development indicators that may, for example, enumerate relevant sustainable development goals (SDG) and, as appropriate, additionally include indicators that are publicly specified by a host country? (<i>Paragraph 2.10.2</i>)</p>	<input type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon does not currently maintain formal procedures that prescribe a fixed list or menu of sustainable development indicators for project developers to report. However, the program encourages project developers to disclose environmental and social co-benefits associated with their projects as part of project documentation and public project information. These disclosures may include contributions to relevant United Nations Sustainable Development Goals where applicable.

BCarbon recognizes the value of transparently communicating sustainable development contributions and is working to further enhance this aspect of program disclosure. As part of planned registry improvements, project developers will have the option to indicate which Sustainable Development Goals their projects support directly on their project registry page. This feature will allow developers to highlight SDG contributions and other co-benefits in a standardized and publicly accessible manner.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

A publicly available document outlining SDG linkages across BCarbon project types is planned for release following review and approval by the BCarbon Technical Review Committee in Q3 of 2026.

<p>Q18. Do the Program’s procedures clearly state that only units that have been or will be issued to activities that report their sustainable development contributions or co-benefits according to criteria above, can be identified as CORSIA Eligible Emissions Units? (<i>Paragraph 2.10.2</i>)</p>	<input type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon does not currently have procedures stating that only units issued to activities reporting sustainable development contributions or co-benefits may be identified as CORSIA Eligible Emissions Units (EEUs), as BCarbon does not presently issue units eligible under CORSIA.

BCarbon is in the process of developing policies and procedures in accordance with ICAO’s CORSIA framework. Accordingly, the program will update its procedures and public disclosures, including requirements related to the identification and designation of CORSIA EEUs.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon is planning several updates to strengthen the disclosure of sustainable development contributions. During 2026, BCarbon intends to publish a publicly available document outlining how its project types may contribute to relevant Sustainable Development Goals, pending review and approval by the BCarbon Technical Review Committee.

In addition, BCarbon is planning registry enhancements that will allow project developers to disclose the

Sustainable Development Goals and other co-benefits associated with their projects directly on their registry project pages. If BCarbon is approved under CORSIA, the program will also update its procedures and public disclosures to reflect requirements related to the identification and designation of CORSIA Eligible Emissions Units.

Q19. Does the programme publicly disclose any provisions for monitoring, reporting and verification in relation to these criteria? (<i>Paragraph 2.10</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon publicly discloses provisions for monitoring, reporting, and verification related to its environmental and social safeguard criteria through its program documentation and required project forms. Project developers must identify environmental and social risks, describe monitoring procedures, and outline mitigation and management measures as part of the required Safeguards Systems Assessment Form. The form requires developers to specify monitoring methods and the frequency of monitoring activities for identified risks, as well as document mitigation and emergency response measures and implementation status. These requirements provide a structured process for ongoing monitoring and reporting of environmental and social impacts associated with project activities, and they form part of the documentation reviewed during project oversight and verification.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Environmental and Social Risk Assessment Policy and the Safeguards Systems Assessment Form for review or slated for review and expected completion in Q3 of 2026.

PART 2: *Quantification and tracking*: Validation and Verification procedures; Quantification and MRV; Offset Credit Issuance and Retirement Procedures; Identification and Tracking; Clear and transparent chain of custody

Criterion: Are quantified, monitored, reported, and verified

Q1. Are procedures in place to ensure... (<i>Paragraph 3.3</i>)	
a) ...that emissions units are based on accurate measurements and valid quantification methods/protocols?	<input type="checkbox"/> YES
b) ...that emission reductions are measured, calculated and reported in a transparent manner?	<input checked="" type="checkbox"/> YES
c) ...that monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at <i>specified intervals</i> throughout the duration of the crediting period?	<input checked="" type="checkbox"/> YES
d) ...that mitigation is measured and verified by an accredited and independent third-party verification entity?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) through d):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon requires that all emissions units be based on accurate measurements and valid quantification methods defined in the BCarbon Quantification Standard and applicable project-type Protocols. Projects must implement protocol-specific monitoring plans that define approved data sources, measurement techniques, calibration requirements, uncertainty management procedures, and quality control systems. Quantification methodologies are science-based, conservative, and ISO-aligned, and are independently assessed by BCarbon-approved Validation and Verification Bodies (VVBs). BCarbon retains oversight authority to review all quantification outputs prior to issuance, ensuring accuracy, traceability, and methodological validity.

b) BCarbon ensures that emission reductions are measured, calculated, and reported in a transparent manner through a structured validation, verification, and public disclosure framework aligned with ISO standards. BCarbon requires that validation occur prior to, or in tandem with, verification in accordance with ISO 14064-3. BCarbon ensures that emission reductions are measured, calculated, and reported in a transparent manner by requiring public disclosure of independently assured validation and verification documentation. Final validation and verification reports, or executive summaries thereof, must be made publicly available through the BCarbon Registry, subject only to limited redaction of commercially sensitive information. These disclosures must specify the applied methodology, credit vintage, quantified mitigation outcomes, material and immaterial findings, level of assurance, and final conclusions. By mandating public access to this independently verified information, BCarbon provides stakeholders with the ability to scrutinize the measurement, calculation, and reporting processes, thereby reinforcing transparency and accountability.

c) BCarbon requires continuous monitoring and periodic reporting throughout the entire crediting period, as defined in the applicable protocol procedures and project-specific Monitoring Plan. Monitoring frequencies, parameters, and reporting intervals are protocol-specific and must be adhered to consistently. Verification occurs at defined intervals to confirm monitored results, and any deviations, data gaps, or uncertainties must be transparently documented and conservatively addressed.

d) All mitigation outcomes must be validated and verified by independent third-party VVBs that are accredited under ISO 14065 or an equivalent standard approved by BCarbon. The BCarbon VVB Policy establishes strict requirements for competence, impartiality, conflict-of-interest management, auditor rotation, and oversight. VVB independence is verified through mandatory conflict-of-interest disclosures, accreditation checks, and BCarbon’s quality review process.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Quantification Standard for review or slated for review and expected completion in Q3 of 2026.

Criterion: Validation and verification procedures

Q2. Does the Programme have in place requirements and procedures for... (Paragraph 2.6)	
a) ...the accreditation of validators?	<input checked="" type="checkbox"/> YES
b) ...the accreditation of verifiers?	<input checked="" type="checkbox"/> YES
c) Are these standards, procedures and requirements publicly disclosed?	<input checked="" type="checkbox"/> YES

Provide evidence of the standards, requirements, and procedures referred to in a) and b), including their availability to the public:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon requires all validators to hold and maintain valid accreditation under ISO 14065, CDM Article 6.4 (or successor standard), or an equivalent accreditation approved by BCarbon. Accreditation must remain valid throughout the engagement, and annual proof of good standing is required. The VVB Policy establishes procedures for initial approval, conditional approval (where accreditation is pending), competence assessment, onboarding, training, and ongoing oversight. Validators are also subject to strict independence, conflict-of-interest, and rotation requirements.

b) The same accreditation, competence, independence, and oversight requirements apply equally to verifiers. Verifiers must hold recognized accreditation, demonstrate sectoral and methodological competence, comply with ISO-aligned assurance requirements, and adhere to BCarbon’s conflict-of-interest, rotation, and quality control rules. BCarbon retains the authority to suspend or remove verifiers for non-compliance, poor performance, or breaches of independence, and may escalate concerns to relevant accreditation bodies.

c) BCarbon’s Validation and Verification Bodies Policy Version 1.0 issued in December 2025 addresses the standards, requirements and procedures in place for BCarbon VVB’s. The policy may be found via [this link](#). BCarbon has established comprehensive standards, requirements, and procedures governing the validation and verification of activities and emission reductions, as well as the accreditation, competence, and oversight of validators and verifiers. These requirements are set out in the publicly available BCarbon Validation and Verification Bodies (VVB) Policy v1.0 (January 7, 2026) and are aligned with internationally recognized standards.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

N/A

Q3. Does the Programme have in place standards and procedures for... (Paragraph 2.6)	
a) ...the validation of activities?	<input checked="" type="checkbox"/> YES
b) ...the verification of emissions reductions and/or removals?	<input checked="" type="checkbox"/> YES
c) Are these standards, procedures and requirements publicly disclosed?	<input checked="" type="checkbox"/> YES

Provide evidence of the standards, requirements, and procedures referred to in a) and b), including their availability to the public:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon requires all projects to undergo independent validation prior to credit issuance. Validation activities are conducted in accordance with ISO 14064-3:2019 and ISO 14065:2020, as operationalized through the BCarbon VVB Policy. The policy defines mandatory validation requirements, including team composition, competence, independence, materiality thresholds, site visit expectations, validation planning, documentation review, and reporting obligations. Validators must assess project design, additionality, permanence, leakage, monitoring systems, and conformity with the BCarbon Standard and applicable protocols.

b) BCarbon requires periodic, independent verification of reported greenhouse gas emission reductions and/or removals prior to credit issuance. Verifications must be conducted with reasonable assurance and in conformity with ISO 14064-3 and ISO 14065, as specified in the VVB Policy. The policy establishes detailed procedures for verification scope definition, sampling approaches, site visits, data quality assessment, independent recalculation, materiality management (5% threshold), corrective action requirements, and final verification reporting. Verification reports are subject to BCarbon review prior to issuance and are made publicly available, subject to redaction of commercially sensitive information.

c) The BCarbon Validation and Verification Bodies (VVB) Policy is publicly available on the BCarbon website, [linked here](#).

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

N/A

Q4. Are procedures in place to ensure...	
a) ...that validation occurs prior to or in tandem with verification? (<i>Paragraph 3.3.2</i>)	<input checked="" type="checkbox"/> YES
b) ...that validation assesses and publicly documents the likely mitigation results from proposed activities supported by the programme? (<i>Paragraph 3.3.2</i>)	<input checked="" type="checkbox"/> YES
c) ...that the results of validation and verification are made publicly available? (<i>Paragraph 3.3</i>)	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) through c):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon requires that validation occur prior to, or in tandem with, verification in accordance with ISO 14064-3. Validation assesses project design, baseline assumptions, eligibility, additionality, and monitoring plans before credit issuance. Verification is conducted ex post to confirm that reported mitigation outcomes have occurred as stated. Both processes must be performed by independent, BCarbon-approved VVBs, and validation findings inform subsequent verification activities to ensure continuity and methodological consistency. These requirements are summarized in the BCarbon VVB policy, [available online](#).

b) The VVB validation report confirms whether the claimed mitigation results from the proposed activities are reasonable and consistent with the methodology and their technical expertise. These reports are publicly available once credits are issued.

c) BCarbon requires that final validation and verification reports, or executive summaries thereof, be made publicly available through the BCarbon Registry, subject only to limited redaction of commercially sensitive information. Reports must disclose the applied methodology, credit vintage, quantified mitigation outcomes, material and immaterial findings, level of assurance, and final conclusions. This ensures transparency, accountability, and public access to independent assurance results.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

N/A

Q5. Does the Programme have procedures in place to...	
a) ...to ensure that <i>ex-post</i> verification of mitigation is required in advance of issuance of emissions units? (<i>Paragraph 3.3</i>)	<input checked="" type="checkbox"/> YES
b) ...or, to transparently identify units that are issued <i>ex ante</i> and thus ineligible for use in the CORSIA? (<i>Paragraph 3.3.5</i>)	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon issues credits only after successful *ex-post* verification of monitored mitigation outcomes. Verification confirms that emission reductions or removals have occurred, are accurately quantified, and comply with all applicable standards and protocols. Credits are issued only after all material findings are resolved and BCarbon completes a final oversight review of the verification results.

b) BCarbon ensures that any units issued *ex ante*, and thus ineligible for use under CORSIA, are transparently identified. As a general matter, BCarbon currently issues credits only on an *ex post* basis, following completion of mitigation activities and successful third-party verification. If any units were to be designated as *ex ante* for non-CORSIA purposes, they would be clearly labeled in the BCarbon Registry as *ex ante* and explicitly identified as ineligible for CORSIA compliance. Registry controls and public disclosures ensure that CORSIA-eligible units are readily distinguishable and traceable. In addition, any BCarbon credits that are CORSIA-ineligible originate from earlier projects or protocols that are not applicable to the crediting period under consideration. Beginning in 2026, all BCarbon projects and protocols are structured to meet CORSIA eligibility criteria for the applicable crediting period, ensuring that newly issued units are CORSIA-eligible by design.

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “*N/A*”):

N/A

Criterion: Offset credit issuance and retirement procedures

Q6. Does the Programme have procedures in place defining how offset credits are... (<i>Paragraph 2.3</i>)	
a) ...issued?	<input checked="" type="checkbox"/> YES
b) ...retired / cancelled?	<input checked="" type="checkbox"/> YES
c) ...subject to discounting (<i>if any</i>)?	<input checked="" type="checkbox"/> YES
d) Are these procedures publicly disclosed?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) through d):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon issues carbon credits only following successful independent verification by a BCarbon-approved Validation and Verification Body (VVB) and final review and approval by BCarbon. Upon approval, credits are issued directly into the project proponent’s account in the BCarbon registry.

b) BCarbon governs the full credit lifecycle through its centralized registry system. Credits issued under the BCarbon standard are uniquely serialized, tracked, and managed within the registry, which enables controlled retirement and cancellation in accordance with BCarbon rules and procedures. Lifecycle oversight from issuance through final disposition is established under the scope and governance framework of the Credit and Issuance Standard.

c) BCarbon does not apply discounting to issued offset credits, and it does not offer discounted credits either in terms of quantity or price. Under the BCarbon Credit Issuance Standard, emissions units are issued on a one-to-one basis, such that one BCarbon credit represents one metric tonne of CO₂-equivalent mitigation that has been conservatively quantified, independently verified, and issued ex post.

d) Yes. The procedures governing credit issuance, including the forthcoming Carbon Credit Issuance Standard, will be publicly disclosed. Once finalized, the Standard will be published and made accessible, and the relevant issuance procedures will be publicly available through each applicable protocol currently listed on the BCarbon website.

Accordingly, stakeholders will be able to review the governing rules, eligibility requirements, issuance criteria, and procedural safeguards applicable to credit issuance. This public disclosure framework ensures that the processes determining whether units are CORSIA eligible or ineligible are transparent, documented, and accessible for external scrutiny.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

N/A

Criteria: Identification and Tracking, Clear and transparent chain of custody

Q7. Does the programme utilize an electronic registry or registries? (<i>Paragraph 2.4.2</i>)	<input checked="" type="checkbox"/> YES
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Provide web link(s) to the programme registry(ies) and indicate whether the registry is administered by the programme or outsourced to a third party (*Paragraph 2.4.2*):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon’s blockchain-based Registry is designed and maintained by ChangeCode for BCarbon. The link to the Registry is: <https://bcarbon.changecode.io/>

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

N/A

Q8. Does the programme have procedures in place to ensure that the programme registry or registries...	
a) ...have the capability to transparently identify emissions units that are deemed ICAO-eligible, in all account types ? (<i>Paragraph 2.4.3</i>)	<input checked="" type="checkbox"/> YES
b) ...clearly identify unit owners or holders? (<i>Paragraph 2.4 (d)</i>)	<input checked="" type="checkbox"/> YES
c) ...identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to	<input checked="" type="checkbox"/> YES

cancellation/retirement? (<i>Paragraphs 2.4 (a) and (d) and 2.4.4</i>)	
d) ...identify unit status, including retirement / cancellation, and issuance status? (<i>Paragraph 2.4.4</i>)	<input checked="" type="checkbox"/> YES
e) ...assign unique serial numbers to issued units? (<i>Paragraphs 2.4 (b) and 2.4.5</i>)	<input checked="" type="checkbox"/> YES
f) ...identify in serialization, or designate on a public platform, each unique unit's country and sector of origin, vintage, and original (and, if relevant, revised) project registration date? (<i>Paragraph 2.4.5</i>)	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the procedures referred to in a) through f):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon maintains a unified electronic registry with the capability to transparently identify emissions units that are designated as ICAO-eligible across all account types. ICAO eligibility is recorded as a defined unit attribute within the registry and can be applied, displayed, and queried consistently regardless of account holder or account classification. This ensures that ICAO-eligible units are clearly distinguishable from non-eligible units throughout their lifecycle and across all registry accounts.

b) Yes, BCarbon's Registry clearly identifies holders or owners of credits within the BCarbon Registry. Up to date, in most cases the owner is the project developer, which can be seen in the table view of the registry ([link here](#)). In the future, there will be an added column for owner/holder of the credit to be displayed on the table. Each owner be they a purchaser or a developer has a unique blockchain address as well to facilitate secure transactions.

c) BCarbon's registry enables full lifecycle tracking of emissions units from issuance through transfer, holding, and final cancellation or retirement. Each unit is issued into a specific account, with ownership and holding status recorded and updated regularly. All transfers between accounts are logged within the registry, creating a transparent and auditable chain of custody from issuance to final disposition.

d) BCarbon's registry explicitly records and displays unit status, including issuance, active/held, transferred, retired, and cancelled statuses. Once a unit is retired or cancelled, its status is permanently updated in the registry and the unit is rendered non-transferable, ensuring that retired or cancelled units cannot re-enter circulation. Issuance and retirement/cancellation events are uniquely recorded and traceable at the unit level.

e) Project owners who want to issue credits begin with a credit issuance request through the BCarbon registry system. This request includes links to the monitoring and verification report. A BCarbon administrator conducts a review of the reports to ensure the available data supports the requested number of credits. Based upon this evaluation, the administrator either approves or declines the request. Once a new credit request is approved, new credits in the form of tokens are minted with a unique project specific ID including:

- Identification of the Project Developer;
- Verification date;
- Protocol under which the credits were issued; and
- A location reference for the project.

f) Credits are serialized within each unique project ID providing ton by ton traceability and made immutable and transparent via the underlying blockchain infrastructure. Issued in this manner, anyone can verify the issuance of new credits with an examination of the blockchain to confirm the new token balances associated with the project.

This process utilizes the registry system and blockchain technology to establish a transparent and auditable structure for the issuance and validation of carbon credits. By deploying a unique project ID, data structures, and BCarbon oversight, the verifiability, reliability and integrity of the issued credits remain assured. Moreover, this approach reinforces accountability and fosters the adoption of sustainable practices.

Significantly, the BCarbon registry relies on blockchain technology as the primary authoritative record for the registration of issued carbon credits ensuring that records cannot be tampered with and avoiding any single point of failure. Credits that exist on blockchain are the only ones that have been officially issued by BCarbon.

Serial numbers play a significant role in ensuring the integrity and traceability of carbon credits. Even though the tokenization of credits on the blockchain ensures the uniqueness of a project and its associated credits, a credit serial number acts as a unique additional and consistent identifier assigned to each vintage of each project, representing a reduction, avoidance or removal of CO₂-e. The serial number ensures that each credit is distinct and traceable. The reliance of serial numbers helps prevent double counting and fraud. Further, it ensures that a specific carbon credit can be tracked throughout its lifecycle, from issuance to retirement, which is necessary for maintaining credibility. Additionally, the serialization of Credits enables us to readily see and better understand the attributes of the Credits as well as to compare projects. BCarbon's serialization structure is provided below.

BCarbon's serialization structure and or Metadata string remain two distinct identifiers. The Credit Serial Number is a unique number that remains tagged onto the credit and cannot be updated or changed. The Metadata string format currently is displayed in the following format. However, Change Code is implementing some changes to the Metadata string that that are intended to provide clarity. These changes should be complete and made available to registry users over the course of the first half of 2026.

Metadata string

- Format: ABC001-07/01/24-ABC-SOILC-v1.1-TX-USA
 - o ABC001 = non-duplicated three letter acronym for the Project Developer (“ABC”) + the project number (“001”).
 - o 07/01/24 = Date of project verification
 - o ABC = non-duplicated three letter acronym for the Project Developer.
 - o SOILC – Protocol used to issue credits.
 - o V1.1 – protocol version that the credits are issued under
 - o TX – State or Province of the project activities
 - o USA – Country of the project activities
 - o GWP – MEEWP projects will add a GWP identifier (GWP20 or GWP100) accordingly

BCarbon's website and registry service provider maintains robust security provisions and measures to ensure credit integrity. BCarbon's web hosting providers maintain SOC 2 and ISO 27001 compliance. Meanwhile, all blockchain accounts to hold or issue credits are secured through multi-factor identification.

B. Any planned/forthcoming changes, including their expected timelines (if none, "N/A"):

Starting Q1 2026, the metadata string will be updated for enhanced clarity and to showcase relevant information of the credits. The new format will remove the duplicated project developer name and change the verification date for the credit vintage, as follows:

- Format: ABC001-2024-SOILC-v1.1-TX-USA
 - o ABC001 = non-duplicated three letter acronym for the Project Developer (“ABC”) + the project number (“001”).
 - o 2024 = Credit vintage
 - o SOILC – Protocol used to issue credits.
 - o V1.1 – protocol version that the credits are issued under
 - o TX – State or Province of the project activities
 - o USA – Country of the project activities
 - o GWP – MEEWP projects will add a GWP identifier (GWP20 or GWP100) accordingly

Additionally, in the future we will add a column to the registry table view to more clearly display the owner/holder of the credit, in the case that they are not the project developer.

Q9. Are provisions in place for registry account screening, including...	
a) ...provisions ensuring the screening of requests for registry accounts? (Paragraph 2.4.7)	<input checked="" type="checkbox"/> YES
b) ...provisions restricting the programme registry (or registries) accounts to registered businesses and individuals? (Paragraph 2.4.7)	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the registry security provisions referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon has implemented a Know Your Customer (KYC) Policy that includes screening for businesses. Only vetted persons and entities may access restricted portions of the registry. These policy provisions are designed to screen requests for registry accounts, and to restrict the registry accounts to registered businesses and individuals. In addition, BCarbon’s Registry requires users of the registry to agree to Credit Ownership Terms and Conditions that govern the terms and use of the registry. A link to the document may be found here. <https://bcarbon.changecode.io/legal>

b) As stated above, only vetted persons and entities may access restricted portions of the BCarbon Registry. BCarbon’s Registry is BCarbon's KYC policy outlines BCarbon’s commitment to uphold international and national Know Your Customer (“KYC”) requirements. This policy extends to businesses as well as individuals and applies to all operations, personnel, and relevant stakeholders engaging with the organization. BCarbon utilizes *Veriff* as our KYC provider. *Veriff* provides secure identity verification checks for all entities conducting business on the BCarbon Registry and remains fully compliant with established US and EU Privacy laws.

B. Any planned/forthcoming changes, including their expected timelines (if none, "N/A"):

N/A

Q10. Does the programme have procedures in place...	
a) ...to ensure that the registry is secure (i.e. that robust security provisions are in place)? (<i>Paragraph 2.4 (c)</i>)	■ YES
b) ...ensuring the periodic audit or evaluation of registry compliance with these security provisions? (<i>Paragraph 2.4.8</i>)	■ YES

Summarize and provide evidence of the registry security provisions referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon’s website and registry service provider maintains robust security provisions and measures to ensure credit integrity. BCarbon’s web hosting providers maintain SOC 2 and ISO 27001 compliance. Meanwhile, all blockchain accounts to hold or issue credits are secured through multi-factor authentication.

b) BCarbon complies and will continue to comply with international money laundering standards and with all applicable KYC laws, regulations, and standards set by relevant international, national, and local regulatory bodies. To this end, BCarbon’s KYC policy addresses the following issues. BCarbon’s KYC Policy and form is available here: [KYC Policy and Form.pdf](#)

Risk Management

- Conduct regular risk assessments to identify and mitigate potential risks associated with customer, partner, and project developer relationships.
- Maintain a documented risk framework to guide KYC-related decisions.

Due Diligence and Customer identification

- Implement robust KYC procedures for identifying and verifying the information of all customers, project developers, and beneficial owners.
- Assess and categorize customer risk profiles.
- Apply enhanced due diligence for high-risk individuals, entities, or jurisdictions including ongoing monitoring, heightened approval requirements, and increased scrutiny over the source of funds.

Monitoring and Reporting

- Continuous monitoring of customer relationships and transactions to ensure ongoing compliance with KYC requirements.
- Document and investigate any unusual or suspicious activity.

Sanctions Compliance

- Prohibition on engagement with individuals or entities from sanctioned countries as well as those individuals or entities that appear on international or national sanction lists.
- Conduct regular screening against updated sanction lists.

Employee Training and Capacity Building

- Provide ongoing KYC compliance training to relevant employees and contractors.
- Ensure staff can identify potential KYC risks and escalate appropriately.

Internal Control and Audits

- Establish internal controls to ensure effective implementation of KYC procedures.
- Conduct periodic internal audits to evaluate policy compliance and effectiveness.
- BCarbon's requirement that *Veriff* or any subsequent KYC Service Provider delete customer information three (3) years after the expiration or termination of any relevant contract or agreement.

Reporting and Escalation Procedures

- Report non-compliance or breaches of KYC procedures to the Compliance Officer.
- Designate a Compliance Officer on a case-by-case basis to oversee KYC adherence and act as the primary point of contact for regulatory matters.
- If no Compliance Officer is formally designated, the CEO will act as Compliance Officer.

Policy Review and Updates

- Review this policy at least annually or upon significant regulatory changes.
- Update procedures to reflect evolving KYC requirements.

Legal and Regulatory Cooperation

- Cooperate fully with legal and regulatory authorities regarding KYC compliance matters.

Whistleblower Protection

- Protect employees, associates or members of the Board of Directors who, in good faith, report violations or concerns related to KYC practices from retaliation.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

The BCarbon KYC Policy & Form has been approved by the Technical Review Committee and will be submitted to the board of directors for approval on March 31st, 2026.

Q11. If the programme registry has the capability to directly transfer units to/from any other registries or equivalent tracking systems that are not operated by the programme, list any/all other registries to which the programme's registry(ies) are linked and indicate where these linkages are publicly disclosed: (*Paragraph 2.4 (e)*)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon currently does not have the capacity to directly transfer credits to/from other Registries. However, BCarbon has engaged Change Code to design and implement a digital bridge between BCarbon and other registries. The initial bridge to another registry is expected to be completed by the end of the first quarter of 2026. Concurrently, BCarbon is in the process of negotiating operational terms and conditions with three registries in order that BCarbon Credits may be transferred to these registries. Upon execution of these agreements, BCarbon will provide CORSIA with the names and contact information of the relevant registries with an appropriate program revision.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon will update this response as linkages to other registries are established, expecting updates through 2026.

Q12. In respect of any registry linkages identified under **Q11** above, list any/all data exchange standards or systems to which the programme’s registry(ies) conform and indicate where this information is publicly disclosed: *(Paragraph 2.4 (f))*

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon information is currently available on the BCarbon website: Bcarbon.org. This publicly available information includes but is not limited to the BCarbon Protocols, current and older, our Additionality Framework, VVB Policy, Public and Local Consultations, Staff, Board of Directors, Internal Governance, Featured Projects, BCarbon Advisory Groups, the BCarbon Project Developers, News, White Papers, the BCarbon Substack including important announcements,, newsletters, and press releases. The website is monitored and updated regularly, and as new policies and protocol revisions are approved by BCarbon’s Board of Directors in accordance with internal procedures, they will be published on the BCarbon website.

B. Any planned/forthcoming changes, including their expected timelines *(if none, “N/A”)*:

Governance, policies and protocols both new and revised are expected throughout 2026 and as identified in this application.

Q13. Does the programme Registry publicly display information... <i>(Paragraph 2.3.1)</i>	
a) ...on each batch of cancelled units?	YES
b) ...in a machine-readable format (e.g., XLS, CSV) that is searchable and downloadable?	YES
c) ...at no cost?	YES
d) ...with no login credentials required?	YES

Provide evidence of the registry features referred to in a) through d):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) Yes, the Registry does display information regarding issued, sold, retired and cancelled credits, publicly available. This is done on the registry website (<https://bcarbon.changecode.io/>).

b) When accessing the registry website and its table view, there is the option of downloading a machine-readable format (.CSV) that is searchable and downloadable. Aside from the data displayed on the table, additional information can be accessed through a project-specific link on that table. See image below.

Portfolio

Table

	Project Name	Protocol	Vintage	Country	Link to Project Details	Unique ID
18	Future Foods Solutions	Soil_Carbon_Protocol_Version_2.0	2024	United Kingdom	Open	FFS001-01/17/
19	Open A Angus Ranch	Soil_Carbon_Protocol_Version_2.0	2023	United States	Open	BCR-US-00002
20	Open A Angus Ranch	Soil_Carbon_Protocol_Version_2.0	2023	United States	Open	BCR-US-00002
21	Open A Angus Ranch	Soil_Carbon_Protocol_Version_2.0	2024	United States	Open	BCR-US-00004
22	Cross Timbers Reclamation Project	Methane_Protocol_Version_1.1	2022	United States	Open	OTC001-09/13
23	Rice Ranch Methane Abatement Project	Methane_Protocol_Version_1.1	2024	United States	Open	GPA001-10/17
24	Carlton Methane Abatement Project	Methane_Protocol_Version_1.1	2024	United States	Open	GPA002-10/17
25	Flipper Methane Abatement Project	Methane_Protocol_Version_1.1	2025	United States	Open	GPA003-04/21
26	Crbon Labs Methane Capture and Remediation Project V1	Methane_Protocol_Version_1.1	2024	Canada	Open	CBL001-03/26
27	Emma Whiteman #1A	Methane_Protocol_Version_1.1	2025	United States	Open	SND001-07/23
28	Ruffel Project 1	Methane_Protocol_Version_1.1	2025	United States	Open	TBR001-11/07
29	Walker Ranch	Methane_Protocol_Version_1.2	2025	United States	Open	CBX001-11/05

29 registros

Airtable Descargar CSV Ver la versión más grande

- c) There are no costs associated with the access to the credit information. The registry link is publicly accessible.
- d) No login credentials are required. They are publicly available on our registry, particularly through the table view on <https://bcarbon.changecode.io/>

B. Any planned/forthcoming changes, including their expected timelines (if none, "N/A"):

N/A

Q14. Does the machine-readable information on cancelled units contain discrete fields for each of the following, in respect of each batch of units (please select)? (Paragraph 2.3.1)

YES

- Quantity of emission units cancelled
- Start of serial numbers
- End of serial numbers
- Date of cancellation
- Name of Programme (if the Registry holds units from multiple Programmes)
- Unit type
- Host country
- Methodology¹⁴
- Start date of the activity's first crediting period
- Vintage year of the unit or batch of units
- CORSIA compliance period(s) for which each batch of units is eligible
- Unique identifier of the registry account where the batch was cancelled

¹⁴Methodology may also be described as a 'protocol' or 'framework'.

<input type="checkbox"/> Beneficiary in whose name the unit was cancelled <input type="checkbox"/> Unique identifier of the registry account from which the cancellation was initiated <i>(if applicable)</i>	
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Provide evidence of the registry features referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

The machine-readable information contains discrete fields on many of the above mentioned categories. Some of the fields are not available directly on the table view of the registry, but are publicly available on the project-specific site, which is linked on the table. These include the start and end of serial numbers, the date of cancellation and the activity’s crediting period, and could potentially include the beneficiary name when there is no confidentiality agreement in place. Since we do not yet have CORSIA eligible credits, that information is not displayed, but will be displayed when necessary.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon is exploring potential improvements or expansions to the amount of information that is displayed on the table view of our registry.

PART 3: *Methods and assumptions: Additionality; Realistic and credible baselines; Clear Methodologies, Protocols, and Development Process; Scope Considerations; Quantification and MRV; Offset Credit Issuance and Retirement Procedures*

Criterion: Clear methodologies and protocols, and their development process

Q1. Provide *evidence*¹⁵ that the programme’s qualification and quantification methodologies and protocols are *in place* and *available for use* (i.e., finalized and not in “draft” form), including where the programme’s existing methodologies and protocols are publicly disclosed. (*Paragraph 2.1*)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon has developed and maintained robust protocols and quantification methodologies that are publicly available on the BCarbon website. Further, BCarbon remains dedicated to the upgrade and refinement of existing protocols to incorporate developments in technology and science into the relevant protocols. Currently BCarbon has active soil, carbon sequestration protocols, a methane emissions reduction protocol and Blue Carbon Protocol with a focus on living shorelines that provide coastal wetlands protection and wetlands carbon sequestration. BCarbon also has a Forest Carbon Protocol that is paused for revision to address additionality and permanence issues. BCarbon’s Protocols, standards and public consultation policy may be accessed via the following link to BCarbon's homepage. <https://bcarbon.org/>

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

¹⁵ For this and subsequent “evidence” requests, evidence should be provided in the text box (e.g., web links to documentation), and/or in attachments, as recommended in “SECTION II: INSTRUCTIONS—Form Completion”.

BCarbon has drafted and submitted to the Forest Carbon Specialized Advisory Group the BCarbon Forest Carbon Protocol for review or slated for review and expected completion in Q4 of 2026.

Q2. Summarize the programme’s process for developing further methodologies and protocols, including the timing and process for revision of existing methodologies, and indicate where this process is publicly disclosed. (*Paragraph 2.1*)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon follows an established procedure for drafting and revision of protocols, methodologies, rules, and documents, along with making decisions. A synopsis of this process is described below, but for a more detailed explanation please reference Section 4.0 of the Quality Management System (QMS) in detail additionally available here: [QMS Framework \(Governance and Operational Procedures\).pdf](#)

- **Step 1 – Document Impetus and Initiation**

- **Trigger:** New requirements, market development, regulatory change, or process improvement need is identified.
- **Responsibility:** BCarbon staff acknowledges, records the issue and outlines objectives.

- **Step 2 – Internal Staff Drafting**

- BCarbon staff develops a **first draft** of the proposed rule or revision.
- Draft includes:
 - o Purpose of the rule
 - o Proposed language
 - o Supporting rationale
 - o Expected impacts

- **Step 3 – Technical Review Committee (TRC) Review (if needed)**

- Once the BCarbon staff has completed the initial draft, the **draft** is submitted to the TRC for **expert review**.
- TRC assesses:
 - o Technical accuracy
 - o Alignment with scientific standards
 - o Feasibility of implementation
- TRC provides **written recommendations** for changes, clarifications, or acceptance.

- **Step 4 – Optional Stakeholder Input (If Deemed Necessary)**

- If requested by BCarbon staff or TRC, the draft is shared with the **stakeholder group** for feedback.
- Stakeholder input is collected through:
 - o Public consultation period (defined time window, typically 30 days)
 - o Targeted outreach for specialized perspectives
- Feedback is summarized by BCarbon staff and shared to the appropriate correspondents before implementation to finalization.

- **Step 5 – Finalization**
- Internal staff incorporates TRC recommendations and any approved stakeholder feedback.
- A **final draft** is prepared and approved internally for publication.
- **Step 6 – Publication, Implementation, and Recordkeeping**
- The final rule or document is published on the BCarbon website and distributed to relevant parties.
- Effective date and any transition provisions are clearly communicated.
- Drafts, feedback, and approval documents are archived for transparency and reference.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon QMS Framework (Governance and Operational Procedures) for review or slated for review and expected completion in Q3 of 2026.

Criterion: Scope considerations

Q3. What level of activities are allowed under the programme (e.g., project based, programme of activities, jurisdiction-scale)? Please indicate where the programme (a) defines and (b) publicly discloses the level(s) at which activities are allowed under the programme: (*Paragraph 2.2*)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon's standards and protocols are all project-based. BCarbon does not issue credits based on product-based methodologies or lifecycle assessments. Eligibility criteria vary by protocol as follows:

The Methane Emissions Elimination through Well Plugging Protocol currently applies to projects located in the United States and Canada. The Soil Carbon and Forest Carbon Protocols are open to projects internationally, without geographic restrictions. The Blue Carbon Protocol currently applies only to projects located in Texas, though BCarbon anticipates amending this protocol to extend eligibility to additional states in the future.

b) All protocols are limited to the specific project types and sectors defined within each respective methodology and can be found publicly available on the BCarbon website linked here: <https://bcarbon.org/> under the protocol tab.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the Forest Carbon Specialized Advisory Group the BCarbon Forest Carbon Protocol for review or slated for review and expected completion in Q4 of 2026.

Q4. Please indicate where the programme (a) defines, and (b) publicly discloses, the eligibility criteria for each type of offset activity (e.g., methodology applicability conditions; which sectors, project types, and geographic locations are covered) (*Paragraph 2.2*)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon’s eligibility criteria, where applicable, is included in its protocols or within its contracts with Project Developers. A summary of each is provided below.

BCarbon's **Methane Emission Elimination through Well Plugging** (MEEWP) Protocol Version 2.1, Section 4.1 specifically defines a well's eligibility. The project must: (1) Be located in the United States or Canada; (2) Acceptable well types are: (i) on-land or onshore wells (over freshwater) registered with the appropriate Local Regulator as oil or natural gas producing wells; (ii) all wells must demonstrate compliance with the Local Regulator's rules; (iii) provide well production data that must be able to be represented via a calendar day exponential decline curve behavior. (3) the well must demonstrate proof of non-production with no net production in the last three (3) months; and (4) The Pre-Plugging Test must confirm methane concentrations at the wellhead that exceed baseline levels observed at a nearby offsite location or the globally averages atmospheric methane concentration of 1,925 parts per billion (ppb) currently is cur, and the well plugging entity must demonstrate that they have. More detailed information may be found in Section 4 of the MEEWP Protocol at the following link. <https://static1.squarespace.com/static/611691387b74c566a67f385d/t/695bf912db25187a6a9029cc/1767635218625/Methane+Protocol+V2.1+Clean+Version.pdf>

BCarbon's Forest Carbon Protocol Version 2.2 is currently paused while revisions relating to permeance, and additionality are made to the document. The link is:

<https://static1.squarespace.com/static/611691387b74c566a67f385d/t/6543d6071a633f4dcb51caa6/1698944538879/Forest-Protocol-TM-C.pdf>

The BCarbon Forest Carbon Protocol mandates Baseline testing as well as regular testing periods at regular five (5) year intervals and true up testing on year ten (10). as well as a commitment to an approved forest management plan that continues for ten years following the expiration or termination of the Developer's Certification Agreement. The Developer is also required to demonstrate that the developer has the right to commit the lands to the program for the term of the agreement, including a forest management plan that extends beyond the crediting term.

BCarbon's Soil Carbon Protocol Version 3.0. mandates Baseline sampling, soil sampling and testing every five years, and a 10-year Minimal Disturbance of the Soil Commitment that begins at the expiration or termination of a soil carbon Developers Certification Agreement with BCarbon. The link to the Protocol for more detailed information is found at the following link:

<https://static1.squarespace.com/static/611691387b74c566a67f385d/t/68f1ad8a1e4b27515abeb52d/1760669066573/Soil+protocol+-+Version+3.0+%28Oct+2025+-+Clean%29.pdf>

In addition, BCarbon's Developer's Certification Agreement Section 1.8 requires a Developer Agreement between a "Project Developer" and Landowner enrolling such Landowner's real property in a soil carbon storage project. The Developer Agreement shall be for a term of five (5) years ending upon completion of the Final Accounting, which shall take place every five years upon renewal of this Agreement and shall require a Minimal Disturbance Commitment of 10 years from the Landowner from the date of the last issuance of Interim Credits or Trued-Up Credits if no Interim Credits issued."

Section 3.7 governing the Developer Landowner Agreement states: "In the event the Developer and Landowner are one and the same entity, the Developer shall comply with all of the Landowner requirements found below in Section 3.8." Developer Agreement with Landowners, ("**Developer Agreement**") shall at a minimum, include the

following provisions a summary of which is found below:

- Developer shall enter into written contracts with each Landowner of the Land consistent with the Protocol requirements of the Certifier and subject to the Certifier's prior written approval, Written contracts with Landowners shall expressly prohibit (i) the double use of Landowner property for simultaneous Soil Carbon Credits on the Lands subject to this Agreement, and (ii) enrollment of Lands that were cleared of native forest, for the purpose of commercial agriculture, within five (5) years prior to the Landowner's enrollment in the program.
- Landowner will commit to maintain the Lands for a period of one hundred and twenty (120) contiguous months in a manner that promotes and protects soil health and landscape ecological health consistent with the Minimal Disturbance Commitment.
- The Developer Agreement shall provide that the Developer shall have all necessary rights and remedies to enforce the Minimal Disturbance Commitment and other obligations of Landowner under this Agreement between Developer and Certifier.
- The Developer Agreement shall include a legal description of the Lands.
- The Developer Agreement shall require the Landowner to provide Developer and the Certifier reasonable access rights to the Lands to ensure that the Minimal Disturbance Commitment and other obligations of Landowner under the contract are being observed.
- The Developer Agreement shall establish a Buffer Account with the Soil Carbon Credits, which shall be maintained over the term of the Minimal Disturbance Commitment.
- To the extent contracts between Developer and Landowner, in effect as of the Effective Date, do not contain all of the foregoing provisions, Developer agrees that all addendums to this Agreement or subsequent contracts between Developer and Landowner contain the foregoing provisions."

BCarbon's Blue Carbon Protocol Version 2.2, has several eligibility mandates identified in Section 6 Living Shoreline Requirements. Among them are (1) Design Requirements that (i) the project be designed to "reduce wave energy and protect against erosion the toe of the wetland;" (ii) stabilize soil organic carbon in the underlying sediments for decades, and (iii) ensure that a wetland sill is created to impound sediment in bulk with minimal loss; (2) engineer's statements including the rebuilding cost impacts of four major storm scenarios; (3) provide for long term monitoring and maintenance over the 50 year term of the project; (4) meet the insurance requirement for insurance over the 50 year life of the project; and (5) All projects registered under the Living Shoreline Blue Carbon protocol are required to conduct a local consultation in accordance with BCarbon's **Local Consultation Policy**. This process is designed to ensure transparency, foster trust with local communities, and provide affected stakeholders with an opportunity to raise questions or concerns regarding the project. Project developers must follow the procedures outlined in the policy, which is publicly available on BCarbon's website, and demonstrate that there were opportunities for stakeholders' engagement as part of the project development process.

Link:

<https://static1.squarespace.com/static/611691387b74c566a67f385d/t/68fc183255d9615599db365b/176135173100/1/Blue+Carbon+protocol+-+V2.2+%28Clean%29.pdf>

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the Forest Carbon Specialized Advisory Group the BCarbon Forest Carbon Protocol for review or slated for review and expected completion in Q4 of 2026.

Criterion: Offset credit issuance and retirement procedures (Continued)

Q5. Does the programme have in place procedures defining... (<i>Paragraph 2.3</i>)	
a) ...the length of crediting period(s)?	<input checked="" type="checkbox"/> YES
b) ...whether crediting periods are renewable?	<input checked="" type="checkbox"/> YES
c) Are these procedures publicly disclosed?	<input checked="" type="checkbox"/> YES

Provide evidence of the procedures referred to in a) and b), including their availability to the public:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon defines the crediting period requirements through its protocols and permanence framework. Each approved protocol specifies minimum crediting periods and associated Minimum Disturbance Commitment (MDC), or Forest Management Plan commitments to ensure that credited greenhouse gas benefits meet BCarbon’s long-term permanence requirements.

b) Crediting periods under the BCarbon system may continue or be renewed only where projects remain in full compliance with applicable protocols, monitoring requirements, permanence thresholds, and periodic independent verification. Ongoing issuance is contingent on successful verification outcomes and BCarbon approval.

c) These procedures will be publicly available as set out in the BCarbon Credit and Issuance Standard v1.0 (January 2026) available here: [BCarbon Credit and Issuance Standard.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Credit and Issuance Standard for review or slated for review and expected completion in Q3 of 2026.

Criterion: Carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional

Q6. Does the Programme have procedures in place to ensure, and to support activities to analyze and demonstrate, legal or regulatory additionality ¹⁶ ?	<input checked="" type="checkbox"/> YES
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¹⁶ Legal or regulatory additionality means that the programme’s carbon offsets represent greenhouse gas emissions reductions or carbon

Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

The Additionality Framework described below is designed to determine whether project-based GHG emission reductions and removals are above and beyond the “business as usual” scenario and whether carbon market incentives were a significant factor. Project Proponents are required to demonstrate that GHG projects exceed currently enforced laws and regulations, exceed common practice in the relevant industry sector and geographic region; and face at least one of three implementation barriers (financial, technological, or institutional). The four-step test Framework is described in Figure 1.

The GHG Project Application must present a credible demonstration, acceptable to BCarbon and the VVB, that the Project passes all of these tests. Some BCarbon protocols may require specific additional tests to assist Project Proponents in demonstrating additionality. The following flow chart shows the different steps involved in the process.

sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate

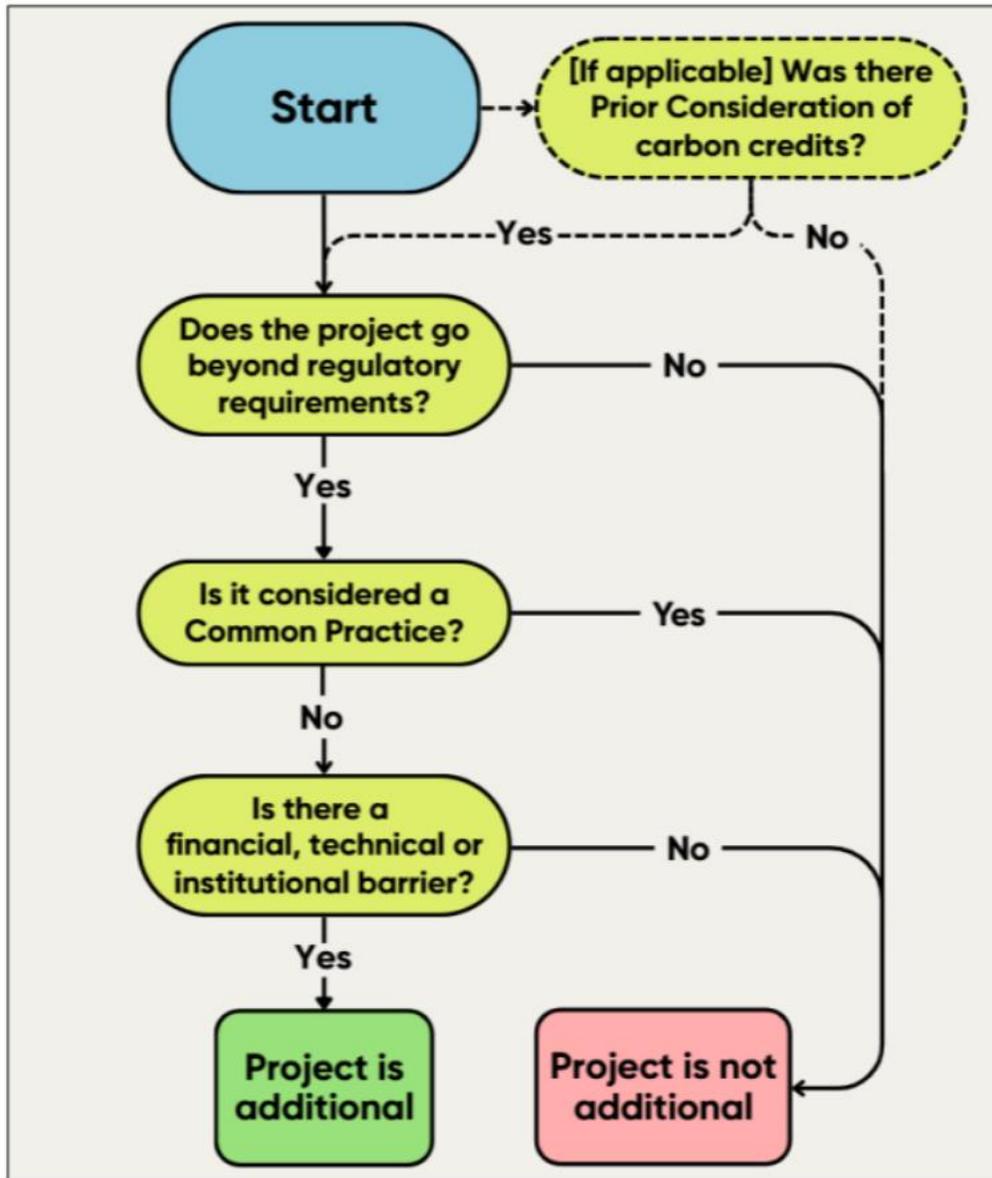


Figure 1: BCarbon's additionality framework flow chart.

B. Any planned/forthcoming changes, including their expected timelines (if none, "N/A"):
N/A

Q7. Identify one or more of the methods below for which the programme has procedures in place to ensure, and to support activities to analyze and demonstrate, that credited mitigation is additional; which can be applied at the project- and/or programme-level: (Paragraphs 3.1, and 3.1.2 - 3.1.3)

- Barrier analysis
- Common practice / market penetration analysis

- ☒ Investment, cost, or other financial analysis
- ☒ Performance standards / benchmarks

Summarize and provide evidence of the policies and procedures referred to above, including describing any/all additionality rules/policies as well as analyses and test types that are utilized under the programme:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

Step 1. Prior Consideration of Carbon Credits

Project Proponents shall provide documentation that demonstrates they considered carbon credits as a source of income for their project activities prior to the start date of these activities. When registering, the proponent needs to show some proof that indicates that carbon revenues were part of the decision-making process at or before the time the project began. Examples of such documentation include stakeholder consultations about the potential financial benefits of the carbon credits, letters of intent or MOUs from potential project investors, and contracts or other evidence of agreement for sharing revenue from sale of the carbon credits.

Project Proponents are exempt from this requirement if the project is submitted to BCarbon within two years of the commencement of the project activities. In such cases, providing evidence of Prior Consideration is optional.

Step 2. Regulatory Surplus

All projects must demonstrate regulatory surplus, meaning that the project activities or associated performance and management actions are not mandated by laws, statues, or other regulatory frameworks. In other words, the Project Proponent cannot have a legal duty to undertake the project activities that generate carbon credits. Each BCarbon Protocol may outline what is required to prove regulatory surplus.

If relevant laws exist but are not enforced, verifiable evidence of non-enforcement may be considered, e.g. white papers, news articles, legal documents, reports, or other materials.

If during the Crediting Period, a regulatory requirement is established that effectively mandates the project activity, the project will no longer be eligible to receive carbon credits as of the date the regulatory requirement becomes effective.

Step 3. Common Practice

Project Proponents must demonstrate that the project activity is not in widespread use or deployment in the relevant industry sector or geographic region without carbon finance. In other words, Project Proponents must demonstrate that the project is not considered common practice, as determined by the degree to which the technology or practices have penetrated the market.

See section 7.4.2 of the GHG Protocol for Project Accounting (World Business Council for Sustainable Development and World Resources Institute) for guidance on evaluation of common practices:

“Collecting data on all baseline candidates within the geographic area and calculating a relative percentage for each different technology or practice will give the level of penetration for each technology or practice. This

percentage could be based on the number of plants or sites using each technology or practice or could be weighted by the proportion of the total output for the market that is attributed to each technology or practice.

The level of penetration that represents common practice may differ between sectors and geographic areas and may depend on the diversity of different baseline candidates within a geographic area. Low rates of penetration or market shares that represent common practice usually occur in areas where there is a large diversity of baseline candidates. If there are few alternative technologies or practices, the common practice penetration rate may be quite high.”

The thresholds of penetration necessary to pass the common practice test will depend on different factors, such as the number of alternatives in the given region. These will be assessed by BCarbon and the VVB in accordance with the guidelines provided above as necessary. In general, if an activity penetration is equal or lower than 20%, it will automatically pass the “Common Practice” test, whereas if it is equal or higher than 50%, it will fail the test. Projects between 20% and 50% will be analyzed on a case-by-case basis and will require further justification for approval.

Step 4. Implementation Barriers:

An implementation barrier represents a constraint that would prevent a proposed project activity. Project Proponents shall demonstrate that the project activity faces at least one of the barriers described below. BCarbon advises Project Proponents, where possible, to include multiple analyses to demonstrate thorough assessment of alternatives which can add to the strength of the project narrative.

A. Financial Barrier

Each project may demonstrate a financial barrier for the project that prevents project occurrence or viability without support from the sale of carbon credits. Under this option, the Project Proponent would provide an investment analysis or equivalent assessment to show that carbon financing (i.e., revenue from the sale of carbon credits) is essential to maintaining the project’s economic viability.

This can be accomplished through either:

1. *Comparison Analysis*: Show that the chosen project scenario is less profitable than common or foreseeable alternatives (including but not limited to the baseline) without carbon financing. This analysis must demonstrate that both:

- a. **The project activity would not be the most economically attractive scenario in the absence of carbon credits, compared with mutually exclusive alternative and/or baseline scenarios; and**
- b. The alternative and/or baseline scenarios provide the same types of projects or services as the project activity, where applicable.

2. *Benchmark Analysis*: Show that the project does not meet an established investment threshold or financial benchmark (e.g., internal rate of return) without carbon financing but does with such financing. The analysis must demonstrate that both:

- a) The economic performance of the activity increases decisively through carbon credits, and

b) Credit revenues can raise the economic performance of the project at or above the required financial benchmark.

Either the Comparison Analysis or the Benchmark Analysis must be completed in accordance with generally accepted accounting practices. The analysis should be completed for a 10-year period; another length of time can be chosen based on the specific nature of the project.

Project Proponents can refer to the GHG Protocol, Annex C: Assessing Net Benefits Using Investment Analysis, or Step 2 of the “CDM Tool for the demonstration and assessment of additionality” for guidance on preparing the Investment Analysis. Alternative methods for investment analysis may be considered by BCarbon and are subject to prior review and approval.

B. Technological Barriers

Project Proponents may demonstrate significant technological barriers to their activities in the absence of carbon credits and associated revenues. These include R&D deployment risk, lack of trained operators, or lack of supporting infrastructure for technology implementation. Evidence should show that these constraints materially limit the feasibility or uptake of the technology under prevailing market conditions, and that revenues from carbon credits would help overcome these challenges.

C. Institutional Barriers

Project Proponents may demonstrate significant organizational, cultural or social barriers (e.g., misaligned incentives across project supply chains) that discourage investment and that carbon financing can overcome to enable project implementation. Investment barriers other than the economic/financial barriers included in the investment analysis may be included here, such as lack of access to private capital due to perceived risks.

Evidence submitted to demonstrate barriers should follow guidance established in the GHG Protocol, Annex B: Illustrative Information Sources for Barrier Categories and the CDM Tool for the demonstration and assessment of additionality, sub-step 3.a.2. Anecdotal evidence can be included but is not sufficient to prove a barrier to implementation exists. Documented evidence is necessary and must originate in credible sources, such as government documents, reports of industrial associations, or peer-reviewed research articles.

BCarbon and the third-party VVB have the right to request additional documentation to support the barrier analysis, and any other aspects of the submission, until the reliability of the additionality assessment is sufficiently demonstrated to justify a finding for the project.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

N/A

Q8. If the Programme provides for the use of non-traditional or new additionality analysis/tests (*i.e.* method(s) *not* listed in Q7 above and *not* a positive list per Q10 below), describe the alternative procedures and how they ensure that activities are additional: (*Paragraph 3.1*)

A. Information reflecting the current state of the programme and its documentation (*i.e.*, as of the time that this form was completed):

BCarbon currently does not provide for the use of alternative additionality procedures outside those formally

adopted within its approved protocols and the overarching BCarbon Additionality Framework referenced in Paragraph 3.1. Currently, there are no supplemental, discretionary, or case-by-case alternative tests applied beyond these established requirements.

All projects must demonstrate additionality through the standardized criteria and assessment steps defined in the BCarbon Additionality Framework. This framework applies consistently across all project types and establishes the core requirements for regulatory surplus, performance beyond common practice, and absence of double counting. These criteria are mandatory and are not modified, waived, or replaced through alternative procedures.

Individual protocols (e.g., soil carbon, forest carbon, or other sector-specific methodologies) may contain additional, sector-specific implementation guidance or eligibility screens that complement the overarching framework. These protocol-specific provisions clarify how additionality is demonstrated within the relevant land-use or activity context.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

N/A

Q9. For activities that use the additionality tests/analysis/methods listed in Q7 and/or Q8 above, is additionality and baseline-setting... (<i>Paragraph 3.1</i>)	
a) assessed by an accredited and independent third-party verification entity, including for activities that use non-traditional or new additionality tests/analysis/methods?	<input checked="" type="checkbox"/> YES
b) reviewed by the programme?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including their availability to the public:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) Submissions must transparently address the additionality criteria, providing sufficient evidence based on the above requirements. If BCarbon and the third-party validator and verifier find the project meets all criteria, BCarbon will provide documentation for the credits that exceed “business as usual” and will endorse the additionality of the carbon credits. BCarbon or the third-party reviewer may request additional information or revised justification before confirming additionality. Material changes (e.g., new regulations, market shifts) impacting project additionality must be promptly disclosed to BCarbon for reassessment.

b) BCarbon will base additionality findings on a robust additionality application that addresses all of the above criteria to BCarbon’s satisfaction. All areas of the above submission shall be assessed both by BCarbon and by a third-party validation and verification body. Submissions must transparently address the additionality criteria, providing sufficient evidence based on the above requirements.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

N/A

Q10. If the programme designates certain activities as automatically additional (e.g., through	
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a “positive list” of eligible project types)(<i>Paragraph 3.1</i>):	
a) Are the criteria for such positive lists conservative?	<input checked="" type="checkbox"/> YES
b) Are these criteria publicly disclosed?	<input checked="" type="checkbox"/> YES
c) Does the Program provide clear evidence on how each activity included on a positive list was determined to be additional?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures for determining the automatic additionality of activities, including a) the criteria used to determine additionality and how these are conservative, b) their availability to the public, and c) how item on the list was determined to be additional, in line with the criteria:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon's criteria for automatic additionality are conservative by design. Rather than maintaining a broad positive list, automatic additionality is available only in narrowly defined, limited circumstances under two specific protocols: the Blue Carbon Protocol and the Methane Emissions Elimination through Well Plugging Protocol. Under the Well Plugging Protocol, a well qualifies only if it is compliant with local regulatory rules, there is no legal obligation to plug it, and the project developer submits a formal attestation confirming no legal obligation exists and that no taxpayer funds have been received for plugging. Under the Blue Carbon Protocol, automatic additionality applies only where the developer attests that the living shoreline would not have been constructed but for the promise of carbon credits and that there is no legal obligation to build the structure. These dual conditions, regulatory compliance plus absence of legal obligation confirmed by attestation, reflect a deliberately restrictive standard that limits automatic additionality to genuinely discretionary actions.

b) BCarbon's criteria for automatic additionality are publicly available. The conditions governing both the Well Plugging Protocol and the Blue Carbon Protocol are set out in BCarbon's publicly accessible Additionality Framework. This document details the specific circumstances under which automatic additionality may be claimed, the attestation requirements project developers must satisfy, and the absence of any general positive list under the Soil Carbon or Forest Carbon Protocols. The framework is available here: <https://bcarbon.org/s/Additionality-Framework-V10.pdf>

c) For each protocol where automatic additionality applies, BCarbon has documented the specific basis for that determination. In the case of well plugging, the evidentiary foundation is the confirmed absence of any legal obligation to act and the lack of public funding support, establishing that the decision to plug is driven solely by the prospect of carbon credits rather than external compulsion or subsidy. In the case of blue carbon living shorelines, the determination rests on the developer's attestation that the project is credit-contingent and not mandated by law. The Additionality Framework ties these conclusions directly to the criteria, showing how each qualifying circumstance satisfies the additionality standard on its own terms rather than by reference to a generalized assumption. There are no automatic additionality activities in the Soil Carbon and Forest Carbon Protocols.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

N/A

Criterion: Are based on a realistic and credible baseline

Q11. Are procedures in place...	
a) ...to ensure that <i>methods of developing baselines</i> , including modelling, benchmarking or the use of historical data, use assumptions, methodologies, and values do not over-estimate mitigation from an activity? (<i>Paragraph 3.2.2</i>)	<input checked="" type="checkbox"/> YES
b) ...requiring activities to ensure and demonstrate that emissions baselines are set in a conservative way and below business-as-usual emission projections? (<i>Paragraph 3.2.4</i>)	<input checked="" type="checkbox"/> YES
c) ...requiring any non-traditional baselines (<i>e.g.</i> , sector-wide performance benchmarks or standards, which do not rely on business-as-usual analysis) to deliver and demonstrate equivalently conservative and below business-as-usual outcomes? (<i>Paragraph 3.2.4</i>)	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in (a) to (c) above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon has procedures in place to ensure that baseline development methods, including modelling, benchmarking, and the use of historical data, do not overestimate mitigation outcomes. The BCarbon Quantification Standard requires that all baseline methodologies apply conservative assumptions, use credible and verifiable data sources, and explicitly address uncertainty. Protocols establish clear eligibility criteria, parameter boundaries, and conservative defaults where data limitations exist. Independent BCarbon-approved Validation and Verification Bodies assess baseline assumptions, data sources, modelling approaches, and calculations against ISO 14064-3, applying a defined materiality threshold of 5 percent. Any identified risks of overestimation must be corrected prior to credit issuance. This multi-layered system of conservative design, third-party review, and BCarbon oversight ensures that credited mitigation outcomes are not overstated. The Quantification Standard is available here: [BCarbon Quantification Standard.pdf](#)

b) Specific methods to demonstrate emissions baselines are determined in each specific methodology, and are aligned with ISO standard, ensuring conservative approaches. Some methodologies, such as the MEEWP protocol, have standardized spreadsheets that can be used in combination with historical, publicly-available production data in order to conservatively estimate baseline emissions. The BCarbon Additionality Framework also, [available online](#), includes details regarding the best practices surrounding the determination of the Business-As-Usual scenario.

c) BCarbon does not have any methodologies that fall under "non-traditional" baselines. However, all baseline determinations are ultimately based on the BCarbon Quantification Standard and Additionality Framework, which require a Business-As-Usual scenario analysis and conservative assumptions to determine baseline emissions.

B. Any planned/forthcoming changes, including their expected timelines (*if none*, "N/A"):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Quantification Standard for review or slated for review and expected completion in Q3 of 2026.

Q12. Are procedures in place for activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration? (<i>Paragraph 3.2.3</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form

was completed):

BCarbon has procedures to ensure that activities can respond appropriately to changing baseline conditions that were not anticipated at the time of project registration. Projects are subject to ongoing monitoring and periodic verification throughout the crediting period, during which deviations, new information, or changes in relevant conditions must be identified and transparently documented. Where changes materially affect baseline validity or quantification assumptions, BCarbon may require corrective actions, conservative adjustments, or protocol revisions in accordance with its Protocol Development Process. Additionally, BCarbon retains the authority to pause, revise, or update protocols if scientific, regulatory, or market developments indicate that baseline assumptions are no longer appropriate. This framework ensures continued baseline integrity over time and prevents the issuance of credits based on outdated or invalid assumptions.

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “N/A”):

N/A

Q13. Are procedures in place to ensure the public disclosure of baselines and underlying assumptions? (<i>Paragraph 3.2</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred above.:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon requires that baselines, underlying assumptions, methodologies, and calculation approaches be transparently documented and publicly disclosed. Approved protocols and standards, which define baseline methodologies and key assumptions, are made publicly available on BCarbon’s website. Project documentation submitted for validation and verification includes detailed descriptions of baseline scenarios, data sources, parameters, and assumptions, which are subject to independent third-party review. Updates or revisions to baseline methodologies are disclosed through BCarbon’s formal protocol development and revision process, including public consultation and publication of final documents, ensuring transparency and accessibility for all stakeholders.

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “N/A”):

N/A

Q14. Please provide any additional information on how the programme ensures that all offset credits are issued against realistic, defensible, and conservative baseline estimations of emissions, including how “conservativeness” and “below business-as-usual” are defined and ensured in practice.

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon has established procedures to ensure that emissions units are issued only against realistic, defensible, and conservative baseline estimations of emissions. All projects are required to quantify emission reductions or removals using an approved BCarbon Quantification Standard and an applicable project-type Protocol, which together define baseline scenarios that reflect a credible business-as-usual case. Conservativeness is a core principle applied throughout baseline development and quantification, consistent with ISO 14064-3. It is ensured using conservative assumptions and default values where uncertainty exists, explicit treatment of uncertainty, application of a defined materiality threshold, mandatory deductions for leakage, and risk-adjusted buffer pool contributions to

address permanence and reversal risk. Independent third-party validation and verification by BCarbon-approved VVBs provides an additional safeguard against over-crediting.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):
N/A

Q15. Are procedures in place requiring that the renewal of a crediting period includes a re-evaluation of the baseline, procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario? (<i>Paragraph 3.3.4</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon requires that any renewal or continuation of a project at the end of its crediting period includes a full reevaluation of baseline assumptions, monitoring plans, and quantification and verification procedures. As stated in the BCarbon Credit and Issuance Standard (Section 3.4 and 5), projects must implement a project-specific Monitoring Plan that defines all relevant parameters, approved quantification methodologies, and procedures for managing uncertainty. These procedures ensure that any assumptions, methods, or models used to calculate emission reductions or removals are reassessed in light of updated scientific, regulatory, or market conditions. The reevaluation process includes independent assessment by a BCarbon-approved Validation and Verification Body (VVB) in accordance with ISO 14064-3, and all changes must be documented, verified, and reviewed by BCarbon prior to credit issuance. This ensures that credit issuance remains based on accurate, conservative, and defensible baselines rather than outdated or unverified assumptions. BCarbon’s VVB Policy may be assessed here. Linked Here:

<https://static1.squarespace.com/static/611691387b74c566a67f385d/t/6961669fafa8770b9234a111/1767990943181/BCarbon+VVB+Policy+v1.0.pdf>

Evidence from BCarbon Policies:

- BCarbon Credit and Issuance Standard, Section 3.4 – “Project proponents shall apply all monitoring procedures as approved and maintain complete records of data, assumptions, calculations, and methodological decisions. Any deviations, data gaps, or uncertainties must be transparently documented and conservatively addressed. All monitoring documentation must support independent third-party validation and verification...”
- BCarbon VVB Policy, Section 6 – “All validation and verification activities must conform with ISO 14064-3 and ISO 14065. VVBs shall develop and submit a statement regarding the Validation/Verification Procedure, including scope, level of assurance, and materiality considerations for each Project being evaluated.”

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):
N/A

Q16. Do the procedures in Q15 above also apply to activities that wish to undergo verification but have not done so within the programme’s allowable number of years	<input checked="" type="checkbox"/> YES
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between verification events?	
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Summarize and provide evidence of the policies and procedures referred to above, including identifying the allowable number of years between verification events:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

Where a project has exceeded BCarbon's allowable number of years between verification events, the same VVB procedures described in Q15 apply. The project must undergo full reevaluation and validation before any credits may be issued, including reassessment of the underlying methodology, assumptions, and monitoring systems. The VVB Policy Section 4 governs rotation and independence requirements, which continue to apply regardless of whether a verification gap has occurred. Any emissions reductions or removals attributable to a lapsed verification period are treated conservatively, and corrective actions may be required before issuance proceeds.

BCarbon's protocols require verification at intervals specified in each project's Monitoring Plan, with a maximum allowable gap of five years between verification events. Projects that have not completed verification within this window must satisfy all applicable VVB requirements before credits can be issued for any portion of the lapsed period.

Evidence from policies:

- BCarbon VVB Policy, Section 4, Rotation Rules – “No VVB may conduct validations/verifications for the same project for more than five (5) consecutive years, and no more than five (5) of seven (7) years continuously.”
- BCarbon Credit and Issuance Standard, Section 4 – “Validation: A prior assessment of the project design and planned procedures against BCarbon requirements. Verification: A periodic retrospective assessment of the monitored data and reported GHG assertions to confirm that the emission reductions and removals have occurred as stated.”

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

N/A

Q17. Please provide any additional information to demonstrate how the procedures described under **Questions 5 to 16 above** provide a reasonable assurance exceed any greenhouse gas reductions or removals that would otherwise occur: (*Paragraph 3.1*)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon is open to revising methodologies to improve measurement and transparency associated with credit issuance and is willing to expand or clarify any of the information provided under Question 5 to 16 above upon CORSIA’s request.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

N/A

PART 4: Permanence and Leakage

Criterion: Permanence

Q1.a) List all emissions sectors (if possible, activity types) supported by the Programme that present a potential risk of reversal of emissions reductions, avoidance, or carbon sequestration:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

Soil

Carbon

Activities involving soil carbon sequestration present a potential risk of reversal due to disturbances, changes in land management practices, environmental conditions, or other external factors that may affect stored carbon. As such, soil-based projects fall within the scope of activities requiring structured risk assessment, monitoring, mitigation, and response under BCarbon's Risk Management Policy and Credit and Issuance Standard.

Blue

Carbon

Blue carbon activities, including carbon sequestration in coastal and wetland ecosystems, present potential reversal risks due to ecological disturbance, environmental change, or other external factors. These activities are therefore subject to BCarbon's structured risk management framework, which requires identification, monitoring, mitigation, and response to risks that could affect the durability of credited sequestration.

Forest Carbon

Forest carbon activities, including afforestation, reforestation, improved forest management, and avoided conversion, present potential reversal risks due to wildfire, pests, extreme weather, land-use change, or other disturbances that may reduce stored carbon. These activities therefore fall within BCarbon's structured risk management framework, which requires risk identification, monitoring, mitigation, and defined response measures under the Risk Management Policy and Credit Issuance Standard to ensure durability and permanence of credited sequestration. **Status of Forest Carbon Protocol:** The BCarbon Forest Carbon Protocol is paused. As of this time, BCarbon is not accepting applications for new forest carbon projects.

Methane Well Plugging

BCarbon supports methane mitigation activities involving the identification, plugging, and permanent closure of abandoned and orphaned oil and gas wells. These activities present a potential risk of reversal of emissions reduction or avoidance if methane leakage resumes due to incomplete plugging, mechanical failure, subsurface pressure changes, or degradation of well integrity over time. Reversal risk may also arise if wells are re-entered or disturbed after closure. Accordingly, these activities require robust monitoring, verification, and long-term assurance measures to ensure the durability and permanence of avoided methane emissions.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Credit and Issuance Standard, the BCarbon Risk Management Policy for review or slated for review and expected completion in Q3 of

2026. The BCarbon Forest Carbon Protocol is under review by the Forest Carbon Specialized Advisory Group and is expected to be completed in Q4 of 2026.

Q1.b) What is the minimum scale of reversal for which the Programme provisions or measures require a response? (Quantify if possible)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon requires affirmative reporting of disturbances and reversal risks across its programs. For both its blue carbon and forest carbon methodologies, developer certification agreements establish a 5% reporting threshold. Program provisions require that any identified disturbance or reversal with the potential to materially affect credited emissions reductions or avoidance be addressed. Project developers are contractually obligated to comply with minimum disturbance commitments and to conduct ongoing site monitoring in accordance with program requirements. Developers must promptly report any observed or reasonably suspected reversal event, including partial or localized disturbances, equipment failures, or other conditions that could result in renewed emissions. The reporting obligation is not subject to a de minimis exception. It is triggered by the detection of a qualifying disturbance, with the 5% threshold governing formal reporting and evaluation parameters under the applicable methodology. Upon notification, BCarbon evaluates the reported event to determine whether corrective measures, remediation, buffer contributions, or credit adjustments are required under program rules and contractual remedies. This framework supports timely disclosure, systematic review, and protection of the environmental integrity of issued credits.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

N/A

Q2. For sectors/activity types identified in question 1(a) above, are procedures and measures in place to <u>require and support</u> these activities to...	
a) undertake a risk assessment that accounts for, <i>inter alia</i> , any potential causes, relative scale, and relative likelihood of reversals? (<i>Paragraph 3.5.2</i>)	<input checked="" type="checkbox"/> YES
b) monitor <u>identified risks</u> of reversals? (<i>Paragraph 3.5.3</i>)	<input checked="" type="checkbox"/> YES
c) mitigate <u>identified risks</u> of reversals? (<i>Paragraph 3.5.3</i>)	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) through c):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

A) BCarbon requires activities to undertake a structured, evidence-based risk assessment that identifies, analyzes, and evaluates risks that could impact system integrity, including the causes, scale, and likelihood of reversals. As set out in the Risk Management Policy, all project proponents and key partners involved in BCarbon projects are required to have a risk management and assessment policy, and where such a policy is absent or deemed inadequate, participants must adopt and implement BCarbon’s Risk Management and Assessment Policy. Risk assessment is conducted through the AREA Cycle (“Assess, Respond, Evaluate, and Adjust”), which explicitly includes risk identification, analysis, evaluation, and prioritization. The Standard Operating Procedure for Risk Management Assessment further requires assessors to evaluate likelihood and impact, classify risks by severity, and document findings through a formal risk assessment

report, ensuring systematic consideration of both probability and magnitude of potential reversals.

- B) BCarbon’s Risk Management Policy establishes procedures to continuously monitor identified risks, including risks of reversals. Under the AREA Cycle, monitoring occurs during the Evaluate phase, which requires tracking results, recording data, and assessing the effectiveness of implemented risk responses. The policy further requires monitoring and follow-up to confirm that corrective and preventive measures are completed and effective. Continuous monitoring is explicitly identified as necessary to ensure ongoing improvement and to prevent recurrence of identified risks. This approach ensures that reversal risks are not only identified at registration but are actively monitored throughout the lifecycle of BCarbon activities.

- C) BCarbon requires that identified risks, including risks of reversals, be actively mitigated through documented response measures. The Respond phase of the AREA Cycle requires the development and communication of targeted mitigation actions, with clear accountability and timelines assigned. The policy specifies that mitigation plans are developed based on identified risks and implemented during the Evaluate phase, where their effectiveness is assessed and recorded. The Adjust phase then requires refinement of controls and mitigation measures based on lessons learned, ensuring that mitigation strategies evolve in response to observed performance and emerging risks. This structured process ensures that reversal risks are addressed proactively and systematically. The Risk Management Policy is available here: [BCarbon Risk Management Policy ISO31000.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Risk Management Policy for review or slated for review and expected completion in Q3 of 2026.

Q3. Are provisions in place that... (Paragraph 3.5.5)	
a) confer liability on the activity proponent to monitor, mitigate, and respond <u>to reversals</u> in a manner mandated in the programme procedures?	<input checked="" type="checkbox"/> YES
b) require activity proponents, upon being made aware of a material reversal event, to notify the programme within a specified number of days?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including indicating the *number of days within which activity proponents must notify the programme of a material reversal event*:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

- A) BCarbon’s Risk Management Policy confers responsibility on activity proponents and key partners to monitor, mitigate, and respond to risks that may impact environmental integrity, including reversal risks. The policy applies to all new client projects seeking registration and requires all project proponents and key partners involved in BCarbon projects to have a risk management and assessment policy. Where a participant does not have an adequate policy, they are required to adopt and implement BCarbon’s Risk Management and Assessment Policy. Under the AREA Cycle, proponents are required to participate in risk identification, implementation of mitigation actions, monitoring of outcomes, and adjustment of controls.

This framework mandates that risks are actively managed by the parties responsible for the activity, consistent with program procedures.

- B) BCarbon’s Risk Management Policy requires that risks, incidents, or external changes affecting BCarbon’s credibility, compliance, or operations trigger the AREA Cycle, including assessment, documentation, communication, and follow-up. The policy requires transparent communication with relevant stakeholders and the documentation and reporting of findings through formal risk assessment reports and monitoring processes. BCarbon’s Risk Management Policy establishes the requirement that activity proponents notify BCarbon upon becoming aware of a material reversal event as part of the program’s structured risk identification, communication, and reporting framework. However, the Risk Management Policy itself does not prescribe a fixed or numerical timeframe (i.e., a specified number of days) for such notification. Instead, the specific notification timeframes are defined within each applicable protocol. Under the current protocols:

Soil Carbon Protocol: notification is required within **60 days** of becoming aware of a material reversal event.

Methane Well Plugging Protocol: notification is required within **30 days**.

Blue Carbon Protocol: notification is required within **30 days**.

Forest Carbon Protocol: notification is required within **30 days** (note that this protocol is paused).

Accordingly, while the overarching Risk Management Policy establishes the obligation to report material reversal events, the precise timing requirement is governed at the protocol level. The BCarbon Risk Management Policy can be found here: [BCarbon Risk Management Policy ISO31000.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Risk Management Policy for review or slated for review and expected completion in Q3 of 2026.

<p>Q4. Are provisions in place that confer responsibility <u>to the programme</u> to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in the programme procedures? (<i>Paragraph 3.5.5</i>)</p>	<p><input checked="" type="checkbox"/> YES</p>
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon has procedures and contractual measures in place requiring project developers to monitor for, report, and compensate for material reversals of credited emissions reductions or avoidance. These requirements are embedded in BCarbon project agreements and apply to all supported activity types that present a potential risk of reversal, including methane well plugging activities. BCarbon does not currently have projects or credits that are eligible for use under the CORSIA. Accordingly, no CORSIA-eligible units have been issued or used, and no buffer credits have been drawn for CORSIA purposes. For future projects that may become eligible, BCarbon commits that any compensation for material reversals associated with credits intended for use in compliance frameworks will be addressed in accordance with applicable program requirements. This includes the use of buffer or replacement credits only from other eligible projects, once such projects and credits are produced and recognized as eligible. This approach ensures that, as eligibility expands, BCarbon’s reversal risk management framework remains aligned

with environmental integrity principles and applicable international standards. The BCarbon Risk Management Policy can be found here: [BCarbon Risk Management Policy ISO31000.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Risk Management Policy for review or slated for review and expected completion in Q3 of 2026.

Q5. Does the Programme have procedures in place which provide for reversal monitoring and compensation requirements to be applied by an activity that generates CORSIA-eligible units for ... (Paragraph 3.5.4) ¹⁷	
a) ...at the very least, twenty (20) years from the start of their first crediting period, in the case of activities that started crediting before 1 January 2027?	<input type="checkbox"/> YES
b) ...at least forty (40) years from the start of their first crediting period, for activities that start crediting after 31 December 2026?	<input type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

Each methodology has different reversal monitoring requirements. Some of them have a 20+ or 40+ year monitoring requirement by default, whereas others are optional or are encouraged to renew their crediting and monitoring period for multiple cycles, in order to comply with the 20+/40+ year requirement. Because we do not currently generate CORSIA-eligible units, a specific rule surrounding CORSIA does not exist, but would be generated if the application is approved.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the Forest Carbon Specialized Advisory Group the BCarbon Forest Carbon Protocol for review or slated for review and expected completion in Q4 of 2026.

Q6. Does the programme have the capability to ensure that any emissions units which compensate for the material reversal of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA are fully eligible for use under the CORSIA? (Paragraph 3.5.6)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon has the capability to ensure that any emissions units used to compensate for a material reversal of mitigation issued as emissions units and used toward offsetting obligations under CORSIA are fully eligible for use under the CORSIA once BCarbon has CORSIA-eligible projects and credits. At present, BCarbon does not have CORSIA-eligible projects or issued units; therefore, no compensatory units are currently required or applicable.

¹⁷ Procedures for jurisdiction-scale activities must alternatively ensure that the volume of emissions units contributed by a given activity to a reversal risk pool will, at a minimum, fully compensate for the activity’s reversal risk for the same timeframe.

When CORSIA-eligible projects and credits are produced, BCarbon will ensure that any replacement or compensation units originate exclusively from other CORSIA-eligible BCarbon projects and meet all applicable CORSIA eligibility criteria in effect at the time of use. The BCarbon Risk Management Policy can be found here: [BCarbon Risk Management Policy ISO31000.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Risk Management Policy for review or slated for review and expected completion in Q3 of 2026.

<p>Q7. Would the programme be willing and able, upon request, to demonstrate that its permanence provisions can fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA? (Paragraph 3.5.7)</p>	<p><input checked="" type="checkbox"/> YES</p>
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon would be willing and able, upon request, to demonstrate that its permanence provisions can fully compensate for the reversal of mitigation issued as emissions units used under CORSIA once BCarbon has CORSIA-eligible projects and credits. At present, BCarbon does not have CORSIA-eligible projects or issued units; therefore, no such demonstration is currently applicable. When CORSIA-eligible projects and credits are produced, BCarbon will rely on its existing contractual reversal obligations, monitoring and reporting requirements, and compensation mechanisms to demonstrate full compensation for any material reversals in accordance with applicable CORSIA requirements.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

N/A

Q8. Please provide any additional information to demonstrate how the program’s procedures ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon’s Quantification standard outlines the buffer pool mechanism that ensures full compensation for material reversals:

”As mentioned in the *Conservatism* section, BCarbon requires that uncertainty be accounted for in the quantification of carbon reductions or avoidance, based on the project’s context and the methodology used. The first layer of risk mitigation is embedded directly into the credit calculation itself, where conservative assumptions and factors are applied to yield a defensible, lower-bound estimate of the carbon sequestered. Methods for determining the risk level are included in the protocol. Project proponents must account for this risk through the corresponding methods outlined in the protocols.

This is primarily managed through a contribution to a Buffer Pool, a collective reserve account of non-tradeable

carbon credits that acts as an insurance mechanism to protect the integrity of a carbon crediting system against reversals.”

The Quantification Standard can be found here: [BCarbon Quantification Standard.pdf](#)

Additionally, the Certification Agreements between BCarbon and the project developers have specific requirements regarding compensation for material reversals, particularly for methodologies that do not require a buffer pool. Some of these measures include compensating reversals with unsold credits or providing credits of similar type when there aren't sufficient unsold credits to fully compensate for reversals.

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Quantification Standard for review or slated for review and expected completion in Q3 of 2026.

Criterion: Assess and mitigate against potential increase in emissions elsewhere

Q9.a) List all emissions sectors (if possible, activity types) supported by the programme that present a potential risk of material emissions leakage:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

Soil

Carbon

Soil carbon projects may present leakage risks where changes in land management practices within the project boundary result in increased emissions or displaced activities outside the boundary. BCarbon therefore requires project proponents to identify, assess, and deduct any material leakage in accordance with the applicable Quantification Standard and Protocol.

Blue

Carbon

Blue carbon activities may involve leakage risks related to displaced coastal, wetland, or marine activities beyond the project boundary. These risks must be evaluated and addressed under BCarbon's leakage assessment requirements as part of project quantification and verification.

Forest Carbon

Forest carbon activities, including afforestation, reforestation, improved forest management, and avoided conversion, may present leakage risks where timber harvesting, land-use change, or other activities are displaced beyond the project boundary. Where applicable, BCarbon requires identification, assessment, and conservative deduction of material leakage under its Quantification Standard and applicable protocol prior to credit issuance.

Status of Forest Carbon Protocol The BCarbon Forest Carbon Protocol is currently paused. BCarbon is not accepting applications for new forest carbon projects at this time.

Methane

Well

Plugging

Methane-related activities may present leakage risks if emissions reductions within the project boundary result in

increased emissions elsewhere, including through displaced practices or system boundary effects. Such risks are required to be identified, assessed, and conservatively accounted for under BCarbon’s Quantification Standard.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the Forest Carbon Specialized Advisory Group the BCarbon Forest Carbon Protocol for review or slated for review and expected completion in Q4 of 2026.

Q9.b) What is the minimum scale of leakage that that would trigger the Programme’s applicable provisions or procedures? (Quantify if possible)

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

Bcarbon defines the minimum scale of leakage in the Quantification Standard stated as:

”3.1 Definition and Principles

BCarbon defines “Leakage” as GHG emissions mitigations that are offset by GHG sources, reservoir, and sinks that have a material or energy flow into, out of, or within the GHG project.

This inadvertent shifting of emissions elsewhere undermines the overall climate benefit of the project activity. Therefore, addressing leakage is critical to ensuring the integrity of carbon credits. BCarbon requires robust assessments of leakage when risks are identified in order to safeguard the permanence of credited emissions reductions or removals, preventing the overstatement of climate impact.

3.2 Leakage Requirements

Project Developers must adhere to the applicable methodology requirements for identifying, assessing, and mitigating leakage. Projects must provide a thorough assessment of any potential increase in GHG emissions that may occur outside the defined system boundary as a consequence of project activities. Leakage can arise from activity shifting, market changes, or alterations in ecosystem processes, and may involve both upstream and downstream impacts. Each methodology outlines potential risks and provides specific instructions for managing and, when necessary, deducting leakage emissions.

Any project-specific leakage risks may result in additional deductions, as determined by the Project Developer, the VVB, and BCarbon.”

In agreement with the VVB standard and the materiality threshold, leakage may not be triggered when it constitutes less than 5% of the expected mitigation activities’ outcomes. Each individual methodology has specific requirements surrounding leakage.

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Quantification Standard for review or slated for review and expected completion in Q3 of 2026.

Q10.a) Are measures in place to <u>assess</u> and <u>mitigate</u> incidences of material leakage of emissions that may result from the implementation of an offset project or programme? (Paragraph 3.6)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon has measures in place to assess and mitigate incidences of material leakage in accordance with the BCarbon Credit and Issuance Standard. All projects under BCarbon are required to identify, assess, and quantify potential sources of emissions leakage that may occur outside the project boundary as a direct consequence of project activities. The program mandates that any material increase in emissions outside the project boundary must be deducted from the final credit calculation, ensuring that the net GHG benefit conservatively reflects the true impact of the project.

The Quantification Standard and project-specific protocols operationalize this requirement by providing guidance on:

- Leakage identification: Proponents must examine all relevant project activities and anticipate potential shifts in emissions or activity displacement outside the project area.
- Leakage assessment and quantification: Material leakage is measured using science-based, protocol-approved methods to ensure accuracy and transparency.
- Mitigation of leakage: Deductions for quantified leakage are applied directly to the credit issuance calculation, ensuring that issued credits only reflect emissions reductions or removals that are real, additional, and not undermined by external emissions increases.

These measures are audited and verified by BCarbon-approved Validation and Verification Bodies (VVBs) during project validation and verification, ensuring consistency and credibility in both the assessment and mitigation of leakage. BCarbon implements a conservative, protocol-driven approach that both assesses and mitigates material leakage, preserving the integrity of all credits issued under the program.

Link Quantification Standard here: [BCarbon Quantification Standard](#)

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Quantification Standard for review or slated for review and expected completion in Q3 of 2026.

Q10.b). Are procedures in place requiring and supporting activities to monitor identified leakage? (Paragraph 3.6.3)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon requires ongoing monitoring of identified leakage risks throughout the crediting period.

Under Section 3.4 (Monitoring, Reporting, and Verification), all projects must implement a project-specific Monitoring Plan that:

- Is developed in accordance with the BCarbon Quantification Standard and applicable protocol
- Identifies all relevant parameters, including those related to leakage
- Specifies monitoring frequencies appropriate to the project type
- Requires transparent documentation of any deviations, uncertainties, or data gaps, addressed conservatively

In addition, Section 3.3 (Leakage) requires that leakage assessment is not a one-time exercise, but part of the quantification and monitoring framework reviewed during validation and verification by a BCarbon-approved VVB. The BCarbon Credit and Issuance Standard can be found here: [BCarbon Credit and Issuance Standard.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (*if none, “N/A”*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Credit and Issuance Standard for review or slated for review and expected completion in Q3 of 2026.

Q11. Are procedures in place requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities? (<i>Paragraph 3.6.4</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon explicitly requires mandatory deduction of material leakage from credit issuance.

Under Section 3.3 (Leakage) of the Credit and Issuance Standard:

“Deductions for quantified leakage must be applied to the final credit calculation in accordance with the applicable protocol.”

Further, Section 5 (Credit Issuance) confirms that credits are issued only after:

- Successful verification of GHG reductions or removals
- Netting out any quantified leakage and buffer pool deductions

This ensures that all credits issued by BCarbon represent conservatively calculated, net climate benefits, and that any emissions leakage that reduces mitigation outcomes is fully accounted for prior to issuance. The BCarbon Credit and Issuance Standard can be found here: [BCarbon Credit and Issuance Standard.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “*N/A*”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Credit and Issuance Standard for review or slated for review and expected completion in Q3 of 2026.

Q12. Are provisions in place requiring activities that pose a risk of leakage when implemented at the project level to be implemented at a national level, or on an interim basis on a subnational level, in order to mitigate the risk of leakage? (<i>Paragraph 3.6.2</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon mitigates leakage risk through mandatory assessment, conservative accounting, and protocol controls, rather than by requiring activities to scale automatically to national or subnational implementation.

The BCarbon Credit and Issuance Standard requires that all projects, regardless of scale, must:

- Assess and mitigate leakage as a core eligibility requirement
- Apply protocol-specific controls designed to address leakage risks appropriate to the activity type and geographic context

Specifically, Section 3.1 (Quantification and Methodology Reference) and Section 3.3 (Leakage) require that projects:

- Identify, assess, and quantify leakage occurring outside the project boundary
- Apply conservative assumptions and deductions to ensure mitigation benefits are not overstated

Leakage risk management is therefore embedded at the methodology and protocol level, allowing BCarbon to address leakage risks without mandating national or subnational implementation, while still ensuring environmental integrity. The BCarbon Credit and Issuance Standard can be found here: [BCarbon Credit and Issuance Standard.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “*N/A*”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Credit and Issuance Standard for review or slated for review and expected completion in Q3 of 2026.

Q13. List all activity types supported by the programme that involve replacing equipment or other physical systems such that these comprise the activity’s baseline:

No current methodologies supported by BCarbon involve a direct replacement of equipment or other physical systems. The MEEWP methodology requires the removal of existing oil and gas equipment, but it is not replaced with other equipment, as the wells are non-producing. Baseline emissions may include emissions from machinery used to perform mitigation activities (e.g., vehicles used in agricultural projects under the soil carbon protocol). Increase in emissions from this equipment will result in a deducted carbon credit outcome. Reduced emissions will not necessarily result in an increased carbon credit outcome, as the nature of the reduction may be different from

the specific credit type (e.g., drawdown of CO2 in the soil vs. Avoided emissions related to a truck's fuel consumption). In these cases, those reductions can be included as part of the co-benefits instead.

For the activity types listed above, does the programme have procedures ensuring that <i>(select all that apply):</i> (Paragraph 3.6.4)	
(a) the baseline equipment is demonstrably decommissioned, destroyed, or scrapped, or otherwise demonstrated to no longer be in use,	<input type="checkbox"/> YES
(b) emissions from equipment disposal are discretely assessed, mitigated where possible, and deducted from the verified results of the activity,	<input checked="" type="checkbox"/> YES
(c) where procedures enable the baseline equipment to potentially be re-sold or otherwise remain in use, equivalent procedures for assessment, mitigation, and accounting deductions apply to emissions resulting from its continued use.	<input type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) through c) above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) Baseline measuring equipment is controlled and owned by the project proponents and their contractors. All of the verification equipment must be ISO compliant in their relevant fields.

b) BCarbon’s active protocols address leakage

BCarbon’s Methane Protocol’s Net Emissions Reductions are addressed in the following manner:

5.7. Net Emissions Reductions

The net emissions reduction is calculated using Equation 8.

Equation 8. Net Emissions Reduction.

$$N = (G - TPE) \cdot (1 - D)$$

Where:		Units:
N	Net Emissions Reductions	tCO ₂ e
G	Baseline Emissions Reductions	tCO ₂ e
TPE	Total Project Emissions	tCO ₂ e
D	Uncertainty Discount (5% of total credits)	tCO ₂ e

The number of credits issued will be equal to the net emissions reductions once total project emissions are deducted from gross emissions reductions and reduced by the uncertainty discount.

BCarbon’s Blue Carbon Protocol addresses leakage:

7.5. Emissions Leakage

Leakage refers to the unintended increase in greenhouse gas emissions outside the boundaries of a project that occurs as a result of the project's activities. In other words, while the project may reduce or avoid emissions in one area, it indirectly causes emissions to rise elsewhere, offsetting part of the project's climate benefit.

In the case of living shoreline projects, there are no significant sources of leakage, as these interventions do not displace emissions-intensive activities to other locations. Unlike land-use projects where economic pressures may shift deforestation or development elsewhere, living shorelines are typically sited in already vulnerable or eroding coastal zones where no comparable emissions-generating activity is displaced. Because the implementation of living shorelines enhances coastal resilience without inducing demand for carbon-intensive alternatives, no systemic emissions shift is expected. For this reason, leakage is not considered as part of the crediting calculations under the Living Shoreline Blue Carbon protocol.

The BCarbon Forest Carbon Protocol is currently paused, in part to address the leakage procedures.

The BCarbon Soil Carbon Protocol Project addresses Emissions:

6.2. Project Emissions

Projects under the BCarbon Soil Carbon Protocol are required to describe the land management activities that will be conducted in the Project Area for the purposes of carbon sequestration. When the **emissions associated with these practices change** with the implementation of a Project, they should be accounted for and deducted from credit issuances for the Project. For example, amendments used to increase carbon accrual may have a considerable upstream carbon footprint, or vehicles/machinery used to improve soil structure or transport workers require fuel to operate. If the amendment, machinery, or other tool is being used as part of the activities that increase carbon drawdown for the Project, its associated emissions must be quantified.

c) Baseline measuring equipment is controlled and owned by the project proponents and their contractors. All of the verification equipment must be ISO compliant in their relevant fields.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon has drafted and submitted to the Forest Carbon Specialized Advisory Group the BCarbon Forest Carbon Protocol for review or slated for review and expected completion in Q4 of 2026.

**PART 5: *Double counting*: Avoidance of Double Counting, Issuance and Claiming;
Only counted once towards a mitigation obligation**

Criteria: Avoidance of Double Counting, Issuance and Claiming and Are only counted once towards a

mitigation obligation

Q1. Does the Programme have measures in place ...	
a) ...to ensure the transparent transfer of units between registries, if applicable? <i>(Paragraph 3.7.1 and 3.7.5)</i>	■ YES
b) ...to ensure that only one unit is issued for one tonne of mitigation? <i>(Paragraph 3.7.1 and 3.7.5)</i>	■ YES
c) ...to ensure that one unit is issued or transferred to, or owned or cancelled by, only one entity at any given time? <i>(Paragraphs 3.7.2 and 3.7.6)</i>	■ YES
d) ...to discourage and prohibit the double-selling of units, which occurs when one or more entities sell the same unit more than once? <i>(Paragraph 3.7.7)</i>	■ YES

Summarize and provide evidence of the policies and procedures referred to in a) through d):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon has measures in place to ensure that only one carbon credit is issued per verified tonne of greenhouse gas mitigation. Under Section 5 (Credit Issuance) of the Credit and Issuance Standard, Credits are issued only after successful independent verification of the conservatively calculated volume of GHG reductions or removals, net of any leakage or buffer pool deductions.

b) This establishes a one-to-one correspondence between verified mitigation and issued units. Further, the standard establishes that credits are issued into the BCarbon registry following final approval by BCarbon, and issuance is contingent on conformity with approved methodologies, validation, verification, and materiality thresholds. These requirements ensure transparent issuance and accounting of units within the registry framework and prevent the creation of more than one unit for the same tonne of mitigation.

c) BCarbon’s program structure ensures that each issued credit exists as a unique unit within the BCarbon registry. Under Section 5 (Credit Issuance), credits are issued into a specific project proponent’s account only after verification and approval. The registry-based issuance model, combined with independent validation and verification, ensures that each unit is uniquely identified and accounted for, such that it may be held, transferred, or cancelled by only one entity at a time within the registry system. Credits are issued only once and only after confirmation that all program requirements have been met.

d) BCarbon discourages and prevents double-selling through centralized issuance, independent verification, and registry control.

The Credit and Issuance Standard requires that:

- Credits are issued only after ex-post verification by a BCarbon-approved Validation and Verification Body
- Credits are issued only once for verified mitigation outcomes
- All issued credits are recorded within the BCarbon registry, which serves as the authoritative record of issuance and ownership

This framework prevents the same unit from being sold more than once, as units cannot be duplicated or reissued outside the registry process. The requirement that credits represent real, measurable, additional, and verified mitigation further reinforces the prohibition against double-selling. The BCarbon Credit and Issuance Standard can be found here: [BCarbon Credit and Issuance Standard.pdf](#)

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Credit and Issuance Standard for review or slated for review and expected completion in Q3 of 2026.

Q2. Does the Programme have procedures in place...	
a) ...requiring mitigation from emissions units used by operators under the CORSIA to be appropriately accounted for by the host country when claiming achievement of its target(s) / pledges(s) / mitigation contributions / mitigation commitments, in line with the relevant and applicable international provisions? (Paragraph 3.7.10.1)	<input checked="" type="checkbox"/> YES
b) ...that provide for the use of any other method(s) to avoid double-claiming? (Paragraph 3.7.10.2)	<input type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon’s current project portfolio is primarily hosted in the United States, where there is no national government registry or governance framework that provides formal corresponding adjustments or host-country authorization mechanisms for the prevention of double claiming between private offset use and national inventories. As such, for U.S.-based projects, double-claiming prevention through national accounting frameworks is not currently available, and this limitation reflects the host country governance context, not a deficiency in program controls.

However, BCarbon has certification agreements with project developers, and anticipates additional agreements, with project developers in jurisdictions participating in the Paris Agreement that do maintain national governance frameworks for accounting and authorization of mitigation outcomes. For projects hosted in those countries, BCarbon is requesting alignment with applicable host country accounting requirements, including mechanisms intended to prevent double claiming between the credit user (e.g., airlines under CORSIA) and the host country’s national GHG inventory.

Accordingly, while host country authorization and corresponding adjustment requirements are not applicable to current U.S.-hosted projects, this criterion is met or will be met for future BCarbon projects implemented outside the United States, where national governance systems exist and are capable of supporting double-claiming prevention under the Paris Agreement framework. As evidence of this change, a redacted copy of the letter sent project Developers in CORSIA participating countries is attached. The BCarbon Credit and Issuance Standard can be found here: [BCarbon Credit and Issuance Standard.pdf](#)

b) BCarbon uses the publicly accessible platform CAD Trust (<https://climateactiondata.org/>) to review existing projects and ensure that the mitigation activities submitted under BCarbon’s program are not already receiving carbon credits under a different registry or methodology. BCarbon’s credits are not yet listed under the CAD Trust

system, but we are exploring ways to connect with them during 2026.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Credit and Issuance Standard for review or slated for review and expected completion in Q3 of 2026.

Q3. Does the Programme have procedures in place for the following: (Paragraph 3.7.8)	
a) to obtain, or require activity proponents to <u>obtain and provide to the programme</u> , written attestation from the host country’s national focal point or focal point’s designee?	<input type="checkbox"/> YES
b) for host country attestations to be obtained and <u>made publicly available prior to the use of units from the host country in the CORSIA?</u>	<input type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon does not currently require written attestations from a host country national focal point for projects hosted in the United States, as the U.S. does not maintain a national focal point, authorization system, or corresponding-adjustment framework for voluntary carbon market activities under CORSIA or Article 6. This reflects the absence of a host-country governance mechanism, rather than the absence of program-level procedures. Accordingly, such attestations are not obtainable nor applicable for U.S.-based activities under the current national policy framework.

b) For U.S.-hosted activities, no host-country attestations can be obtained or disclosed, as no such documents are issued by the host country. Consequently, there are no attestations to make publicly available prior to CORSIA use for these projects. Where BCarbon operates in, or expands to, host countries that do issue national authorizations or attestations, the program’s existing transparency practices—consistent with its public registry, disclosure of validation and verification documentation, and alignment with ISO 14064-3 and ISO 14065—support the public availability of relevant host-country documentation prior to the use of credits under CORSIA, subject to host-country rules and applicable confidentiality constraints.

B. Any planned/forthcoming changes, including their expected timelines (if none, “N/A”):

BCarbon expects to have Host Country Letters of Authorization in place by Q4 of 2026.

Q4. Does the Programme have procedures in place in place to guide the contents of host-country attestations? (Paragraph 3.7.9)	<input type="checkbox"/> YES
If YES, do the Programme’s procedures on the contents of host-country attestations facilitate countries to identify each of the following:	
(i) the national point of contact,	<input type="checkbox"/> YES
(ii) authorized unit vintages,	<input type="checkbox"/> YES
(iii) authorized activity types, if applicable,	<input type="checkbox"/> YES
(iv) the CORSIA compliance period for which the units are authorized,	<input type="checkbox"/> YES
(v) the expected timing and processes for applying and reporting adjustments that are informed by the host country’s specified definition of “first transfer”;	<input type="checkbox"/> YES

(vi) the country’s chosen accounting method consistent with the relevant provision of 2/CMA.3 Annex I “Guidance on cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement.	<input type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon expects Host Country Letters of Authorization to be in place by Q4 2026. Because the United States does not issue host-country authorizations, corresponding adjustments, or equivalent attestations for voluntary carbon credits, there are no attestation documents that could specify steps taken to prevent double claiming at the national inventory level. As a result, this requirement is not applicable to current BCarbon projects hosted in the United States. For projects implemented in jurisdictions that are Parties to the Paris Agreement and that maintain national authorization and accounting frameworks, BCarbon anticipates that such attestations would be required where they exist and are legally or procedurally available, consistent with host-country governance rules and international best practices.

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “N/A”):

BCarbon expects Host Country Letters of Authorization to be in place by Q4 2026.

Q5. Does the Programme have procedures in place...	
a) ...requiring host country attestations to confirm the use of the applicable approach(es) referred to in Question 2 above?	<input type="checkbox"/> YES
b) ...requiring host country attestations to specify and describe the steps taken to prevent double-claiming (in line with these approaches / requirements)?	<input type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon is developing the policy for requiring Host Country Letters of Authorization in accordance with CORSIA requirements.

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “N/A”):

BCarbon expects to have policy development complete by Q4 of 2026.

Q6. Please provide any additional information about the programme’s measures to require and demonstrate that host countries of emissions reduction activities agree to account for any offset units issued as a result of those activities, such that double claiming does not occur between the airline and the host country of the emissions reduction activity.

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon is developing the policy for measures to require and demonstrate that host countries of emissions reduction activities agree to account for any offset units issued as a result of those activities.

B. Any planned/forthcoming changes, including their expected timelines (*if none*, “N/A”):

BCarbon expects to have policy development and protocol development complete by Q3 and Q4 of 2026

respectively.

Q7. Does the Programme have measures in place to...	
a) make publicly available <u>any national government decisions</u> related to accounting for units used in ICAO, including decisions related to the contents of host country attestations described in paragraph 3.7.8 of Appendix A? (Paragraph 3.7.11)	<input type="checkbox"/> YES
b) update information pertaining to host country attestation as often as necessary to avoid double-claiming? (Paragraph 3.7.11)	<input type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b):

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

a) BCarbon has not yet incorporated Host country Letters of Authorization into policies and procedures, but is preparing to revise the Risk Management Policy to accommodate Host Country Letters of Authorization in order to prevent double issuance. The BCarbon Risk Management Policy can be found here: [BCarbon Risk Management Policy ISO31000.pdf](#)

b) In accordance with the answer above, BCarbon plans to regularly monitor register information in order to prevent double issuance and counting.

B. Any planned/forthcoming changes, including their expected timelines (if none, "N/A"):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Risk Management Policy for review or slated for review and expected completion in Q3 of 2026.

Q8.a) Does the Programme have procedures in place 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? (Paragraph 3.7.12)	<input type="checkbox"/> YES
Q8.b). Do the procedures referred to above... (Paragraph 3.2.12)	
(i) ...specify the relevant accounting information in each report submitted in accordance with Section IV of Annex I to Decision 2/CMA.3?	<input type="checkbox"/> YES
(ii) ...specify the expected timing and processes by which the programme will compare the host country's reported information on authorizations in its national reports with the information provided by the country in its attestation ?	<input type="checkbox"/> YES
iii) ...require publication of all host-country attestations and related documentation <u>generated by the emissions unit programme (e.g., results from the comparison)</u> ?	<input type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

BCarbon has not yet incorporated host country letters of authorization into policies and procedures, but is preparing to revise the Quantification Standard to have procedures in place to compare countries' accounting for emissions

units in national emissions reports against the volumes of eligible units issued by BCarbon 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.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Quantification Standard for review or slated for review and expected completion in Q3 of 2026.

Q9. Would the Programme be willing and able, upon request, to report to ICAO's relevant bodies, as requested, performance information related to, <i>inter alia</i> , any material instances of and programme responses to country-level double claiming; the nature of, and any changes to, the number, scale, and/or scope of host country attestations; any relevant changes to related programme measures? (<i>Paragraph 3.7.13</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

Yes, once the procedures under development are in place under BCarbon's policies and governance, and upon written request from ICAO, BCarbon would be willing and able to report to ICAO's relevant bodies.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon has drafted and submitted to the BCarbon Technical Review Committee the BCarbon Quantification Standard for review or slated for review and expected completion in Q3 of 2026.

Q10. Does the Programme have procedures in place for the programme, or proponents of the activities it supports, to 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, including in the instance that the attestation is withdrawn.? (<i>Paragraph 3.7.14</i>)	<input type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

A. Information reflecting the current state of the programme and its documentation (i.e., as of the time that this form was completed):

Currently, BCarbon is revamping its procedures, methodologies and policies to be transparent and provide publicly available material in compliance with international carbon credit accreditation entities.

B. Any planned/forthcoming changes, including their expected timelines (*if none, "N/A"*):

BCarbon expects to have policy development and protocol development complete by Q3 and Q4 of 2026 respectively.

PART 6: Programme comments

Are there any additional comments the programme wishes to make to support the information provided in this form?

[Click or tap here to enter text.](#)

SECTION IV: SIGNATURE

I certify that I am the administrator or authorized representative (“Programme Representative”) of the emissions unit programme (“Programme”) represented in a) this form, b) evidence accompanying this form, and c) any subsequent oral and/or written correspondence (a-c: “Programme Submission”) between the Programme and ICAO; and that I am duly authorized to represent the Programme in all matters related to ICAO’s analysis of this application form; and that ICAO will be promptly informed of any changes to the contact person(s) or contact information listed in this form.

As the Programme Representative, I certify that all information in this form is true, accurate, and complete to the best of my knowledge.

As the Programme Representative, I acknowledge that:

the Programme’s participation in the assessment does not guarantee, equate to, or prejudice future decisions by Council regarding CORSIA-eligible emissions units; and

the ICAO is not responsible for and shall not be liable for any losses, damages, liabilities, or expenses that the Programme may incur arising from or associated with its voluntary participation in the assessment; and

as a condition of participating in the assessment, the Programme will not at any point publicly disseminate, communicate, or otherwise disclose the nature, content, or status of communications between the Programme and ICAO, and of the assessment process generally, unless the Programme has received prior notice from the ICAO Secretariat that such information has been and/or can be publicly disclosed.

Signed:

Eric Unverzagt
Full name of Programme Representative (*Print*)

March 9th, 2026
Date signed (*Print*)



Programme Representative (*Signature*)

(This signature page may be printed, signed, scanned and submitted as a separate file attachment)



ICAO

Programme Application Form, Appendix C

Programme Exclusions Scope

CONTENTS: With this document, programmes may define which of their activities they are **excluding** from TAB's assessment. The two sheets are described below:

- Sheet A) Activities the programme describes in this form will be **excluded** from assessment by ICAO's TAB
- Sheet B) List of all methodologies / protocols that support activities described under Sheet A

Emissions Unit Programme Registry Attestation

(Version 3, January 2023)

PART A. Applicability and Instructions

1. Relevance and definitions:

1.1. These terms are relevant to emissions unit programmes and their designated registries:

1.1.1. *CORSIA Eligible Emissions Unit Programme:* emissions unit programme approved by the ICAO Council as eligible to supply emissions units under the CORSIA.

1.1.2. *CORSIA Eligible Emissions Unit Programme-designated registry:* registry designated by a CORSIA Eligible Emissions Unit Programme to provide its registry services and approved by the ICAO Council as reflected in the programme's listing contained in the ICAO Document titled "*CORSIA Eligible Emissions Units*".

1.1.3. *Material change:* any update to the procedures of an emissions unit programme or its designated registry that would alter the functions that are addressed in the Emissions Unit Criteria (EUC), related guidelines, or the contents of this attestation. This includes changes that would alter responses to questions in the application form that the programme has submitted to the ICAO Secretariat or contradict the confirmation of the registry's adherence to the requirements contained in this attestation.

1.1.4. *Cancel:* the permanent removal and single use of a CORSIA Eligible Emissions Unit within a CORSIA Eligible Emissions Unit Programme designated registry such that the same emissions unit may not be used more than once. This is sometimes also referred to as "retirement", "cancelled", "cancelling" or "cancellation".

1.1.5. *Business day:* defined by the CORSIA Eligible Emissions Unit Programme registry when responding to formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units.

1.2. References to "Annex 16, Volume IV" throughout this document refer to Annex 16 to the Convention on International Civil Aviation — *Environmental Protection, Volume IV — Carbon Offsetting and reduction Scheme for International Aviation (CORSIA)*, containing the Standards and Recommended Practices (SARPs) for CORSIA implementation. Reference to "ETM, Volume IV" throughout this document refer to Environmental Technical Manual (Doc 9501), Volume IV — *Procedures for demonstrating compliance with the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)*, containing the guidance on the process to implement CORSIA SARPs.

2. Programme - registry relationship:

2.1. The ICAO Council's Technical Advisory Body (TAB) conducts its assessment of emissions unit programme eligibility including an assessment of the programme's provisions and procedures governing the programme registry, as represented by the programme. The ICAO Council determines CORSIA eligible emissions units upon recommendations by TAB and

consistent with the EUC. The programme registry is not separately or independently considered throughout this process. The TAB may periodically review and report to the ICAO Council regarding the continued consistency of programme's registry and its administration with terms contained in this document's Part B.

- 2.2.** The provision of registry services under the CORSIA by a CORSIA Eligible Emissions Unit Programme registry is fully subject to the terms, conditions and limitations to the programme's scope of eligibility. Such terms include, *inter alia*, the programme's commitment to administer any and all provisions and procedures governing the programme registry in the manner represented by the programme in the application form and additional information provided to TAB during the assessment process.
 - 2.3.** A CORSIA Eligible Emissions Unit Programme registry can provide registry services to aeroplane operators prior to the programme's and programme registry's demonstration of the registry's consistency with the registry requirements contained in this attestation. However, the programme registry can only claim to support and can only provide for aeroplane operators to fulfill the provisions in Annex 16, Volume IV and ETM, Volume IV involving emissions unit cancellation-, reporting-, and verification-related actions after its consistency with the registry requirements contained in this attestation is demonstrated by the programme in accordance with Part A, Paragraph 3 of this document, and the signed attestation is published on the CORSIA website in addition to the ICAO document "*CORSIA Eligible Emissions Units*".
- 3. Submitting an "*Emissions Unit Programme Registry Attestation*":**
- 3.1.** Both the administrator or authorized representative ("Programme Representative") of an emissions unit programme ("Programme"), and the administrator or authorized representative ("Registry Representative") of the registry designated by the Programme ("Programme Registry") will review and attest to their acceptance (as signed in Section 8 of this attestation) of all terms contained herein.
 - 3.2.** The Programme will electronically submit to the ICAO Secretariat a unique, dual-signed attestation for each and every Programme Registry that will provide its registry services to the Programme under the CORSIA:

 - 3.2.1.** If the Programme is determined to be eligible by a decision of the ICAO Council taken in 2020, the Programme will submit the signed attestation(s) to the ICAO Secretariat no later than one year after the Programme is determined to be eligible by the ICAO Council.
 - 3.2.2.** From 2021, the Programme should submit the signed attestation(s) to the ICAO Secretariat at the time of applying for assessment by the TAB. If the Programme is determined to be eligible by a decision of the ICAO Council after 31 December 2020, the Programme will submit the signed attestation(s) to the ICAO Secretariat no later than 180 days after the Programme is determined to be eligible by the ICAO Council.
 - 3.3.** As soon as possible upon receiving a signed attestation from the Programme, the ICAO Secretariat will:

3.3.1. Forward the signed attestation to the TAB; and

3.3.2. If the Programme is determined to be eligible by a decision of the ICAO Council, publicly post the signed attestation on the CORSIA website in addition to the ICAO document “*CORSIA Eligible Emissions Units*”.

PART B: Emissions Unit Programme Registry Attestation

4. Programme application materials. As the Registry Representative, I certify items 4.1 to 4.4:

- 4.1. I have read and fully comprehend the following information:
 - 4.1.1. The instructions and terms of this attestation;
 - 4.1.2. The contents of the ICAO document “*CORSIA Emissions Unit Eligibility Criteria*”;
 - 4.1.3. The contents of the most recent version of the application form that the Programme has provided to the ICAO Secretariat; and
 - 4.1.4. The terms, conditions and limitations to the Programme’s scope of eligibility and further action(s) requested to the Programme by the ICAO Council, as presented to the Programme upon relevant decision of the ICAO Council on the Programme’s eligibility¹ for the 2024-2026 compliance period (First Phase).
- 4.2. The Programme’s representation of its provisions and procedures governing the Programme Registry, and of Programme Registry functionality, as contained in the most recent version of the application form that the Programme has provided to the ICAO Secretariat, is true, accurate, and complete, to the best of my knowledge;
- 4.3. The Programme Registry will notify the Programme of any material changes to the Programme Registry, to enable the Programme to maintain consistency with relevant criteria and guidelines throughout its assessment by TAB and up to an eligibility decision by the ICAO Council; and, if applicable, continuing on from the effective date of an affirmative eligibility decision by the ICAO Council, the Programme Registry will notify the Programme of any material changes to the Programme Registry, such that the Programme can maintain consistency with relevant criteria and guidelines;
- 4.4. The Programme Registry and Registry Representative will not publicly disseminate, communicate, or otherwise disclose the nature, content, or status of communications between the Programme, the Programme Registry, and/or the ICAO Secretariat, related to the status of the Programme’s provision of programme and registry services under the CORSIA, unless the Programme has received prior notice from the ICAO Secretariat that such information has been and/or can be publicly disclosed.

5. Scope of Programme responsibilities under the CORSIA. As the Registry Representative, I acknowledge items 5.1 to 5.2:

- 5.1. The scope of the Programme assessment by the TAB, through which the TAB will develop recommendations on the list of eligible emissions unit programmes (and potentially project types) for use under the CORSIA, which will then be considered by the ICAO Council for an eligibility decision, including the Programme’s responsibilities throughout this process; and

¹ Only applicable when the Programme submits the signed “*Emissions Unit Programme Registry Attestation*” to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

- 5.2. The scope and limitations of the ICAO Secretariat's responsibilities related to the assessment process.
6. **Programme - Registry relationship.** As the Registry Representative, I understand and accept items 6.1 to 6.2:
- 6.1. The Programme Registry's provision of registry services under the CORSIA is subject to the terms, conditions and limitations to the Programme's scope of eligibility, as presented to the Programme upon relevant decision of the ICAO Council on the Programme's eligibility; and
- 6.2. Only after the Programme and the ICAO Secretariat have completed all steps in Part A, Section 3 of this attestation, can the Programme Registry facilitate and identify emissions unit cancellations specifically for CORSIA use, and support any related reporting and verification activities. The Programme Registry will not promote itself as being capable of providing registry services for the described purpose until such time.
7. **Scope of Programme Registry responsibilities under the CORSIA.** As the Registry Representative, I certify items 7.1 to 7.12:
- 7.1. The Programme Registry is capable of fully meeting the objectives of any and all Programme provisions and procedures related to the Programme Registry that the Programme is required to have in place:
- 7.1.1. In the manner represented by the Programme in the application form that the Programme has provided to the ICAO Secretariat; and
- 7.1.2. As acknowledged by the Programme in the signed "Programme acceptance to terms of eligibility for inclusion in the ICAO document "*CORSIA Eligible Emissions Units*"².
- 7.2. The Programme Registry will not deny a CORSIA participant's request for a registry account solely on the basis of the country in which the requestor is headquartered or based;
- 7.3. The Programme Registry will identify (in the case of applicants to be assessed to determine their eligibility) / identifies (when the Programme is determined to be eligible by a decision of the ICAO Council) CORSIA Eligible Emissions Units as defined in the ICAO document "*CORSIA Eligible Emissions Units*"³. This will be/is done consistent with the capabilities described by the Programme in its communications with ICAO, and any further requirements decided by the ICAO Council for CORSIA Eligible Emissions Unit Programme-designated Registry.
- 7.4. The Programme Registry will, upon request of the CORSIA participant account holder or participant's designee, designate the participant's cancellation of emissions units for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle;

² Only applicable when the Programme submits the signed "*Emissions Unit Programme Registry Attestation*" to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

³ As prescribed in the ICAO Document "*CORSIA Eligible Emissions Units*", the programme must provide for and implement its registry system to identify its CORSIA eligible emissions units as defined in the document.

- 7.5. The Programme Registry will, within 1 – 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units within the registry, and barring system downtime that is scheduled in advance or beyond the control of the registry administrator, make visible on the Programme Registry’s public website the account owners cancellations of CORSIA Eligible Emission Units as instructed. Such cancellation information will include all fields that are specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV;
- 7.6. The Programme Registry will, upon request of the CORSIA participant account holder or participant’s designee, generate report(s) containing the information specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV;
- 7.7. The Programme Registry will maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants’ designees, and transaction events carried out by a user; and disclose documentation of such practices upon request. The Programme Registry will utilize appropriate method(s) to authenticate the identity of each user accessing an account; grant each user access only to the information and functions that a user is entitled to; and utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user. Such security features will meet and be periodically updated in accordance with industry best practice;
- 7.8. The Programme Registry will, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant’s designee, notify the CORSIA participant account holder or their designee, and notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme’s application form;
- 7.9. The Programme Registry will ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV, and ETM, Volume IV. Without prejudice to the aforementioned, such requirement would not prevent a Programme Registry from utilizing secure, time-bound and auditable methods for correcting unintentional user-entry errors;
- 7.10. The Programme Registry will ensure that all cancellation information on its website is presented in a user-friendly format; is available at no cost and with no credentials required; is capable of being searched based on data fields; and can be downloaded in a machine-readable format, e.g., .xlsx;
- 7.11. The Programme Registry will retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations on an ongoing basis and for at least three years beyond the end date of the latest compliance period in which the emissions unit programme is determined to be eligible; and consistent with the Programme’s long-term planning, including plans for possible dissolution;
- 7.12. The Programme Registry will append a document to the end of the signed attestation describing how it will ensure its ability to implement the requirements of this document. This will include references to existing registry functionalities that already meet the

requirements of this document and/or description of business practices and procedures that ensure the Programme Registry's ability to implement the requirements in this document prior to identifying any emissions unit cancellations specifically for CORSIA use and supporting any related reporting and verification activities.

- 8. Accuracy and completeness of information.** The signatures below certify that the information provided is true and correct in all material respects on the date as of which such information is dated or certified and does not omit any material fact necessary in order to make such information not misleading. Representatives are duly authorized for official correspondence on behalf of their organization.



Eric Unverzagt
Programme Representative Signature

Registry Representative Signature

Eric Unverzagt
Programme Representative Name

Eric Unverzagt
Registry Representative Name

BCarbon
Programme Name

BCarbon Registry
Registry Name

03/09/2026
Date

03/09/2026
Date

Instructions for Registry Representative: Please append a document on the next page of this attestation describing your Registry's ability to implement the requirements of this document, including references to existing registry functionalities that meet the requirements of this document and/or description of business practices and procedures that ensure the Programme Registry's ability to implement the requirements of this document prior to identifying any emissions unit cancellations specifically for CORSIA use and supporting any related reporting and verification activities.

ATTACHMENT A: PROGRAMME REGISTRY ATTESTATION DISCLOSURE FORM

PART 1: INSTRUCTIONS FOR REGISTRY REPRESENTATIVE

The following information request corresponds to the registry representative's certification of its adherence to items 7.1 to 7.1.1 of the *Emissions Unit Programme Registry Attestation* "Scope of Programme Registry responsibilities under the CORSIA".

In accordance with item 7.12 of the *Emissions Unit Programme Registry Attestation*, registry administrators are to complete and append this form to the signed *Attestation* describing how the Registry will ensure its ability to implement the requirements of the *Attestation*. This includes references to existing registry functionalities that already meet the requirements of the *Attestation* and/or descriptions of business practices and procedures that ensure the Programme Registry's ability to implement the requirements in the *Attestation*.

For further guidance regarding the format and approaches for providing summary information and evidence of system functionalities and/or procedures in this form, refer to instructions for "**Form Completion**" in the *Application Form for Emissions Unit Programmes*⁴.

PART 2: PROGRAMME AND REGISTRY REPRESENTATIVE INFORMATION

1. Programme Representative Information

A. Programme Information

Programme name: [BCarbon](#)

Administering Organization⁵: [BCarbon, Inc.](#)

Official mailing address: [4709 Austin Street, Houston, Texas, 77004](#)

Telephone #: [+1 281-682-5511](#)

Official web address: [bcarbon.org](#)

B. Programme Administrator Information (i.e., individual contact person)

Full name and title: [Eric Unverzagt, Chief Executive Officer](#)

Employer / Company (*if not programme*): [BCarbon, Inc.](#)

E-mail address: eric.unverzagt@bcarbon.org Telephone #: [+1 281-682-5511](#)

C. Programme Representative Information (if different from Programme Administrator)

⁴ <https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx>

⁵ **Please complete**, even if the name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme is the same as "*Programme Name*".

Full name and title: Guido Bertola, Technical Director

Employer / Company (*if not Programme*): BCarbon, Inc.

E-mail address: guido.bartola@bcarbon.org

Telephone #: +1 346-638-3415

2. Registry Representative Information⁶

A. Registry Information

Registry / system name: BCarbon Registry

Administering Organization: BCarbon, Inc.

Official mailing address: 4709 Austin Street, Houston, Texas, 77004

Telephone #: +1 281-682-5511

Official web address: bcarbon.org

B. Registry Administrator Information (i.e., individual contact person)

Full name and title: Eric Unverzagt, Chief Executive Officer

Employer / Company (*if not Registry Administering Organization*): BCarbon, Inc.

E-mail address: eric.unverzagt@bcarbon.org

Telephone #: +1 281-682-5511

C. Programme Representative Information (if different from Registry Administrator)

Full name and title: Guido Bertola, Technical Director

Employer / Company (*if not Registry Administering Organization*): BCarbon, Inc.

E-mail address: guido.bartola@bcarbon.org

Telephone #: +1 346-638-3415

⁶ Please complete this section, even if the business, government agency, organization, or other entity that administers the Emissions Unit Programme Registry is the same as the organization described in **Part 2. "1. Programme Representative Information"**.

PART 3: EVIDENCE OF ADHERENCE TO SCOPE OF REGISTRY RESPONSIBILITIES

7.1	Does the Programme Registry fully meet the objectives of any and all Programme provisions and procedures related to the Programme Registry that the Programme is required to have in place in the manner represented by the Programme in the application form that the Programme has provided to the ICAO Secretariat and, if applicable ⁷ , as acknowledged by the Programme in the signed “Programme acceptance to terms of eligibility for inclusion in the ICAO document “ <i>CORSIA Eligible Emissions Units</i> ”?”	<input checked="" type="checkbox"/> YES
	Describe how the Registry ensures its ability to implement these provisions:	
	The BCarbon Registry fully meets the objectives of all Programme provisions and procedures related to the Programme Registry as represented in BCarbon's application to the ICAO Secretariat. Registry functionalities described in the application are under development or operational and consistent with the representations made therein. Where the application identified planned developments with estimated implementation timelines, those plans remain on track and consistent with the timelines represented. The Registry's current state and forward-looking commitments are accurately reflected in the application materials in all material respects.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	
All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>		

7.2	Will the Programme Registry ensure that a CORSIA participant’s request for a registry account will not be denied solely on the basis of the country in which the requestor is headquartered or based?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement this provision:	
	The BCarbon Registry conducts an internal review of all account applicants as part of its standard onboarding process. However, aeroplane operators that are recognized CORSIA participants may be granted pre-approval for a registry account by virtue of their CORSIA eligibility status and will not be discriminated against or denied solely based on the country in which they are headquartered or based. CORSIA participant status serves as a qualifying credential that generally satisfies BCarbon's account review requirements, ensuring that no applicant is denied access solely based on national origin or country of domicile.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	

⁷ Only applicable when the Programme submits the signed “*Emissions Unit Programme Registry Attestation*” to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

	All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>
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7.3	Will the Programme Registry (in the case of applicants to be assessed to determine their eligibility)/Does the Programme Registry (when the Programme is determined to be eligible by a decision of the ICAO Council) identify / label its CORSIA eligible emissions units as defined in the ICAO Document “ <i>CORSIA Eligible Emissions Units</i> ”?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implements this provision:	
	BCarbon credits are registered on a blockchain-based registry that supports the clear identification and labeling of CORSIA-eligible emissions units. Credits that meet CORSIA eligibility requirements are designated as such at the point of registration and are visibly distinguished from non-CORSIA-eligible credits within the registry system. This ensures that CORSIA-eligible units are unambiguously identifiable and cannot be confused with or treated interchangeably with credits that do not meet CORSIA eligibility criteria. This functionality is consistent with the identification and labeling requirements set out in the ICAO Document "CORSIA Eligible Emissions Units."	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	
	All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>	

7.4	Will the Programme Registry, upon request of the CORSIA participant account holder or participant’s designee, designate the participant’s cancellation of emissions units for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement these provisions:	
	Upon request of a CORSIA participant account holder or their designee, the BCarbon Registry can designate the cancellation of emissions units specifically for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle. This functionality will be fully operational once BCarbon has CORSIA-eligible units available in the registry. The BCarbon Registry currently supports the retirement and cancellation of issued credits, and this same functionality will be extended to CORSIA-eligible units once they are available in the registry. BCarbon's cancellation procedures and registry infrastructure are designed to accommodate CORSIA designation requirements in accordance with Annex 16, Volume IV, and ETM, Volume IV.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	

	All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>
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7.5	a. Will the Programme Registry, within 1 – 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units within the registry, and barring system downtime that is scheduled in advance or beyond the control of the registry administrator, make visible on the Programme Registry’s public website the account owner’s cancellations of CORSIA Eligible Emission Units as instructed.	<input checked="" type="checkbox"/> YES
	b. Will such cancellation information (row a) include all fields that are specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement these provisions:	
	<p>a) Upon receipt of formal instruction from a duly authorized representative of an account holder, the BCarbon Registry will process and make visible on its public website the relevant cancellation of CORSIA Eligible Emissions Units within 1 to 3 business days, barring any system downtime that is scheduled in advance or otherwise beyond the control of the registry administrator. This capability is being established through procedures currently under development, which are specifically designed to meet the timelines and transparency requirements set out in Annex 16, Volume IV, and ETM, Volume IV.</p> <p>b) All cancellation records will include the data fields required for CORSIA purposes as specified in Annex 16, Volume IV, and ETM, Volume IV, ensuring that publicly visible cancellation information is complete, accurate, and fully compliant with ICAO requirements.</p>	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	
All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>		

7.6	Will the Programme Registry, upon request of the CORSIA participant account holder or participant’s designee, generate report(s) containing the information specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement this provision:	
	Upon request of a CORSIA participant account holder or their designee, the BCarbon Registry will generate reports containing all information specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV. This reporting functionality is built into the registry's existing infrastructure and will be made available to CORSIA participants in accordance with applicable requirements.	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	

All web-based evidence described in the application can be found here: <https://bcarbon.org/> or have been included as attachments/publicly available links in the *2026-Programme-Application-Form*

	a. Does the Programme Registry maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants' designees, and transaction events carried out by a user?	<input checked="" type="checkbox"/> YES
	b. Does the Programme Registry disclose documentation of such practices (row a) upon request?	<input checked="" type="checkbox"/> YES
	c. Does the Programme Registry utilize appropriate method(s) to authenticate the identity of each user accessing an account?	<input checked="" type="checkbox"/> YES
	d. Does the Programme Registry grant each user access only to the information and functions that a user is entitled to?	<input checked="" type="checkbox"/> YES
	e. Does the Programme Registry utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user?	<input checked="" type="checkbox"/> YES
	f. Do such security features (rows a – e) meet and undergo periodic updates in accordance with industry best practice?	<input checked="" type="checkbox"/> YES
7.7	Describe how the Registry implements each provision in rows a – f:	
	<ul style="list-style-type: none"> a) The BCarbon Registry is built on a blockchain-based infrastructure, which provides an immutable and tamper-resistant record of all registry data and transaction events by design. The decentralized and cryptographically secured nature of the blockchain ensures the ongoing integrity of registry data. b) Documentation of the BCarbon Registry's security practices and infrastructure is available upon request. BCarbon's technology partner, Change Code, maintains technical documentation of the registry's security architecture that can be provided to relevant parties as needed. c) The BCarbon Registry employs a Know Your Customer (KYC) process as part of its account onboarding and access control procedures. Each user is required to complete identity verification before being granted access to a registry account, ensuring that only authenticated individuals may access account functions. d) Access controls within the BCarbon Registry are role-based, ensuring that each user is granted access only to the information and functions appropriate to their account permissions. This is enforced through the registry's underlying infrastructure as developed and maintained by Change Code. BCarbon's web hosting providers maintain SOC 2 and ISO 27001 compliance. e) The BCarbon Registry requires explicit user confirmation for all transaction events, including credit transfers, cancellations, and data updates. The blockchain architecture provides an auditable record of each confirmed transaction, ensuring that no event is recorded without deliberate user action. f) BCarbon's registry security practices are maintained and periodically updated in accordance with industry best practices by Change Code. The VVB Policy further supports ongoing quality and integrity standards across registry operations, and security protocols are reviewed and updated on a regular basis to remain current with evolving standards. 	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	

	All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>
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7.8	a. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant’s designee, notify the CORSIA participant account holder or their designee?	<input checked="" type="checkbox"/> YES
	b. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant’s designee, notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme’s application form?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement each provision in rows a and b:	
	<p>a) In the event of any breach of registry data security or integrity affecting a CORSIA participant account holder or their designee, the BCarbon Registry will promptly notify the affected account holder or their designee. Account security incidents will report to all relevant BCarbon stakeholders.</p> <p>b) Upon identifying a breach affecting a CORSIA participant, the BCarbon Registry will also notify BCarbon as the Programme administrator, who will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme's application form.</p>	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	
	All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>	

7.9	Does the Programme Registry ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV, and ETM, Volume IV ⁸ ?	<input checked="" type="checkbox"/> YES
	Describe how the Registry implements these provisions:	
	<p>The BCarbon Registry ensures the full irreversibility of all emissions unit cancellations through its blockchain-based infrastructure. Once a cancellation is recorded on the blockchain, it is permanent and cannot be altered, reversed, or duplicated, ensuring that no emissions unit may be used more than once. The purpose of each cancellation, including its designation for CORSIA compliance, is recorded at the time of cancellation and is similarly immutable. Consistent with the requirements of Annex 16, Volume IV, and ETM, Volume IV, secure and auditable processes are in place to correct unintentional user-entry errors without compromising the integrity or irreversibility of cancellation records.</p>	
In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme		

⁸ Without prejudice to the aforementioned, such requirement would not prevent a Programme Registry from utilizing secure, time-bound and auditable methods for correcting unintentional user-entry errors.

	Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .
	All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>

7.10	a. Does the Programme Registry ensure that all cancellation information on its website is presented in a user-friendly format?	<input checked="" type="checkbox"/> YES
	b. Does the Programme Registry ensure that all cancellation information on its website is available at no cost and with no credentials required?	<input checked="" type="checkbox"/> YES
	c. Does the Programme Registry ensure that all cancellation information on its website is capable of being searched based on data fields?	<input checked="" type="checkbox"/> YES
	d. Does the Programme Registry ensure that all cancellation information on its website can be downloaded in a machine-readable format, e.g., .xlsx?	<input checked="" type="checkbox"/> YES
	Describe how the Registry implements each provision in rows a – d:	
	<ul style="list-style-type: none"> a) The BCarbon Registry's public website presents all cancellation information in a clear and user-friendly format, designed to be accessible and navigable by CORSIA participants and other users without requiring technical expertise. b) All cancellation information on the BCarbon Registry's public website is freely accessible at no cost and does not require any login credentials or account registration to view. c) The BCarbon Registry's public website supports search functionality based on relevant data fields, enabling users to locate cancellation records efficiently. d) Cancellation information on the BCarbon Registry's public website can be downloaded in a machine-readable format, .CSV, to support reporting, verification, and compliance activities by CORSIA participants and other relevant parties. 	
In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .		
All web-based evidence described in the application can be found here: https://bcarbon.org/ or have been included as attachments/publicly available links in the <i>2026-Programme-Application-Form</i>		

7.11	a. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations on an ongoing basis and for at least three years beyond the end date of the latest compliance period in which the emissions unit programme is determined to be eligible?	<input checked="" type="checkbox"/> YES
	b. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations consistent with the Programme's long-term planning, including plans for possible dissolution?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement each provision in rows a and b:	
<ul style="list-style-type: none"> a) BCarbon commits to retaining all documents and data relevant to CORSIA Eligible Emissions Units and cancellations on an ongoing basis and for a minimum of three years beyond the end date 		

of the latest compliance period in which the Programme is determined to be eligible, in accordance with the requirements of this Attestation.

- b) BCarbon's data retention commitments are consistent with its long-term planning, including provisions for the continuity of records in the event of a possible dissolution of the Programme. BCarbon will ensure that appropriate arrangements are in place to preserve CORSIA-relevant data and documentation in all foreseeable circumstances.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

All web-based evidence described in the application can be found here: <https://bcarbon.org/> or have been included as attachments/publicly available links in the *2026-Programme-Application-Form*