

**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)

CONTENTS

Section I: About the assessment of applications

Background
Translation
Disclaimer

Section II: Instructions

Submission and contacts
Form basis and cross-references
Application Form completion
-Application and assessment scope
Disclosure of programme application forms and public comments

Section III: Application Form

General information
PART 1: Governance and Safeguards
PART 2: Quantification and Tracking
PART 3: Methods and Assumptions
PART 4: Permanence and Leakage
PART 5: Avoidance of Double-Counting
PART 6: Programme comments

Section IV: Signature

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

In March 2019, the ICAO Council unanimously approved the ICAO Document *CORSIA 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 *CORSIA Eligible Emissions Units*³. At present, eight Emissions Unit Programmes are eligible to supply CORSIA-eligible Emissions Units for the 2024-2026 compliance period (the CORSIA 'first phase') and four programmes are eligible to supply CORSIA-eligible Emissions Units for the 2027-2029 compliance period (part of CORSIA 'second phase'). The latter programmes are eligible to certify CORSIA 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 CORSIA-Eligible Emissions Units for the **2027-2029 compliance period** (part of the CORSIA '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 *evidence of programme procedures or programme elements*. The evidentiary documentation enables TAB

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

² Recommendations from 2019 TAB assessment cycle: <https://www.icao.int/CORSIA/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/CORSIA/icao-corsia-tab2021>

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

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

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

³ Available on the ICAO CORSIA website: <https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-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 CORSIA website: <https://www.icao.int/CORSIA/icao-corsia-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; standards; specific methodologies and tools (methodological, or for risk assessment, or for risk

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

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

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

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.

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: [Rainbow](#)

Administering Organization¹¹: [Riverse SAS](#)

Official mailing address: [28 Avenue des Pépinières, 94260 Fresnes, France / hello@rainbowstandard.io](#)

Telephone #: -

Official web address: <https://rainbowstandard.io/>

B. Programme Administrator Information

Full name and title: [Clément Georget, General Manager](#)

Employer / Company (*if not programme*): [Riverse SAS](#)

E-mail address: clement@rainbowstandard.io

Telephone #: [+33 6 82 05 40 91](#)

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

Full name and title: [Click or tap here to enter text.](#)

Employer / Company (*if not Programme*): [Click or tap here to enter text.](#)

E-mail address: [Click or tap here to enter text.](#)

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

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:

[Rainbow Executive team and leads:](#)

- [Ludovic Chatoux, CEO](#)
- [Grégoire Guirauden, General Manager and COO](#)
- [Clément Georget, General Manager and CPO](#)

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

- Erica Dorr, Science Lead
- Samara Vantil, Certification Lead
- Nathan Downs, Tech Lead
- Kimberly Joly, Product Lead

Governing Board members:

- Ludovic Chatoux, Chair and president (Rainbow)
- Grégoire Guirauden (Rainbow)
- Clément Georget (Rainbow)
- Margaux Bussière de Nercy (Serena)
- Namratha Kothapalli (SpeedInvest)
- Margaux Gregoir (Alven)
- Stephan Rohr (Twaice)
- Eric Gossart, observer (Serena)

Standard Advisory Board members:

- Renaud Bettin, Chair (VP Carbon, Sweep)
- Fanny Fleuriot (Lead Climate and Sustainability, Apave)
- Laura Beaulier (CEO, Climate Dividend Foundation)
- Ludovic Chatoux (CEO, Rainbow)
- Grégoire Guirauden (COO, Rainbow)
- Clément Georget (CPO, Rainbow)
- Erica Dorr (Science Lead, Rainbow)

Standard Secretariat:

- Clément Georget (General Manager)
- Erica Dorr (Science Lead)

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.

Rainbow operates two main components:

- Rainbow Standard: A carbon-crediting program focused on engineered carbon avoidance and removal projects. The Standard sets transparent, science-based requirements to ensure the environmental integrity of each Rainbow Carbon Credit (RCC).
- Rainbow Technology Platform: The infrastructure that supports the implementation of the Standard, consisting of:
 - Rainbow Registry: A public ledger that ensures traceability and transparency of RCCs from

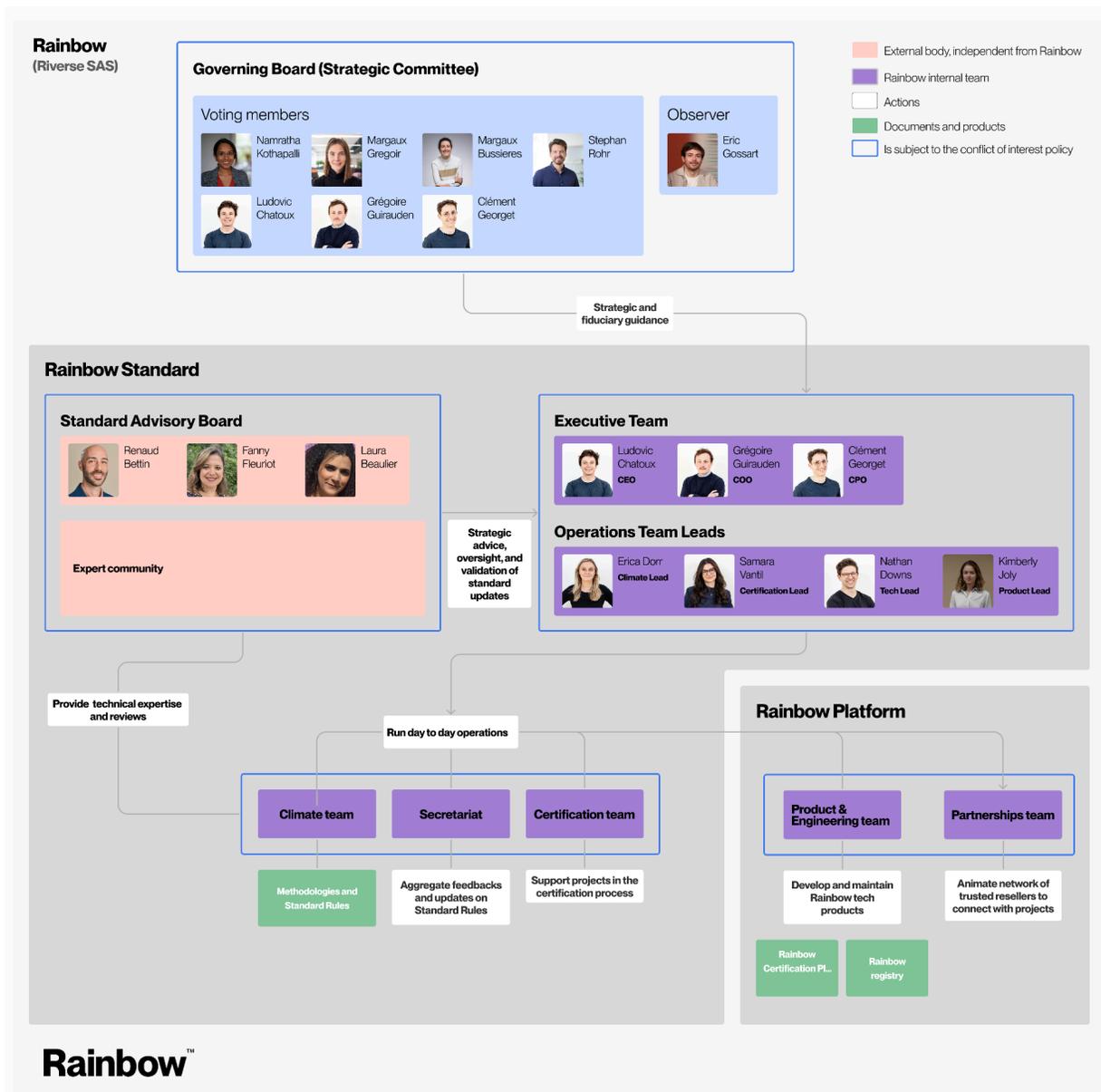
issuance to retirement, preventing double counting and aligning with integrity standards.

- Certification Platform: A digital interface that streamlines the certification process by supporting project developers and validation bodies with tools for impact assessment, documentation, and audit facilitation.

The Governing Board provides strategic and fiduciary guidance to the Rainbow Executive team.

The Standard Advisory Board provides strategic advice, oversight and validation of updates to the standards (methodologies and processes) that the projects adhere to.

The organization chart can be found in the section Organization of the Rainbow Standard Rules, this is publicly available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/organization-of-rainbow#jd4z557gorzj>



The full description of the organisation governance can be found in:

- Rainbow Standard Rules, Overview of Rainbow, paragraph “Organisation”, publicly available at this weblink:
<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/organization-of-rainbow#id-1fob9te>
- Rainbow Procedures Manual, Governance and oversight, paragraph “Main stakeholders”, publicly available at this weblink:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#main-stakeholders>

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
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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) Rainbow defines the underlying attributes of each Rainbow Carbon Credit (RCC) through its Standard Rules and Rainbow Procedures Manual. Each RCC is encoded with unique serial numbers that include key information such as project ID, credit type, vintage, and geography.

As stated in the Procedures Manual:

“Credit serial numbers

Each RCC has its own unique serial number on the Rainbow Registry. Credit IDs are generated using a consistent naming convention with the following components:

Registry identifier: RIV or RBW

Country code (e.g. FR, DE)

Project ID (internal registry identifier)

Mechanism abbreviated as:

AVD for avoidance

RMV for removal

Vintage year (e.g. 2023)

Last 5 characters of the issuance transaction UUID

Credit number within the issuance transaction (e.g. 1 or 248)”

This definition of RCC attributes can be found in the Rainbow Procedures Manual, section Rainbow Carbon Credits, paragraph “Credit attributes”, publicly available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits>

- b) The processes for defining and ensuring the attributes of each unit are publicly disclosed in the Rainbow Standard Documentation, available on the [Rainbow Documentation Hub](#). The Rainbow Registry provides full transparency over the lifecycle of each RCC, including project information, validation/verification reports, and the current status of each unit.

For example, the issuance procedures which assigned the underlying attributes:

“The issuance of RCCs is operated by the Rainbow Certification team once the project's monitoring & verification is conducted, and all Audit Reports are available.

A member of the Rainbow Certification team initiates the issuance, and their name is registered and tracked in the Registry. The issuance details are reviewed by a second Rainbow Certification team member who verifies the accuracy, completeness, and compliance of the issuance with Rainbow’s procedures. The second team member must explicitly approve the issuance in the system. Only upon approval are the RCCs officially issued in the registry.

Upon issuance of removal RCCs, a portion of credits are automatically and immediately transferred from Project accounts to the shared Rainbow Buffer Pool account. The number of RCCs, when calculated as a percentage of the buffer pool contribution, is always rounded up to the nearest whole credit.

All issuance events shall be recorded on the Rainbow registry with at least the following details:

- *Verified by: Accredited VVB that conducted the audit*
- *Monitoring period: period covered by the issuance*
- *Audit Report: audit report produced by the VVB*

The initial owner of all RCCs shall be the Project Developer.”

The procedures related to issuance, transfer, retirement or cancellation of RCCs can be found in Rainbow Procedures Manual, section Rainbow Carbon Credits and are publicly available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits>

All issuances, transfers and retirements under Rainbow can be found on Rainbow Registry publicly available at <https://registry.rainbowstandard.io/>

- c) Rainbow ensures the property aspects of each unit by maintaining a public registry that tracks ownership, transfer, and retirement of RCCs. The registry adheres to stringent information security and transparency standards, ensuring that each unit is unique and not double-counted. The Rainbow Standard Rules explicitly outline requirements to prevent double counting and ensure the integrity of each credit.

Example on RCC status:

“The Rainbow Registry identifies and tracks the following:

- *RCC status according to the definitions outlined below*
- *RCC ownership/holding, from issuance to cancellation/retirement.*

Rainbow Carbon Credits (RCCs) shall have an assigned status on the Rainbow Registry, including one of the following:

Status	Definition
Available	RCCs issued ex-post at the end of the reporting period, following submission of a Monitoring Report and <u>verification audit</u> by a third-party VVB. Available to be transferred and retired.
Retired	Once retired, an RCC and its climate benefit are locked, with its designated purpose for the beneficiary. They are no longer transferable, ensuring exclusivity and preventing any further use or transfer.
Canceled	RCCs that were Available but were found to be invalid (e.g., issued in error, or reversed in the case of removal RCCs. See the <u>Cancelation</u> procedure).
Buffer	Verified removal RCCs issued to the Project Developer account and immediately and automatically transferred to the Rainbow Buffer Pool to cover potential reversal events.

All events (issuance, transfer, retirement, cancellation) shall be recorded on the registry, including the following details:

- *Transaction ID: unique identification of the transaction*
- *Completed at: date of the event*
- *From: organization initial owner of the units*
- *To: new organization owner of the units*
- *Credit serial numbers*
- *Amount of credits*

All events are made public and shall allow for tracking history of ownership of the units.”

The procedures defining and ensuring the property aspects of a RCC can be found in Rainbow Procedures Manual, Rainbow Carbon Credits, paragraph “RCC status” and are publicly available at <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#rcc-status>

- d) The processes for ensuring property aspects (ownership, transfer, retirement) are detailed in the Rainbow Standard Rules and Procedures Manual, both of which are publicly available. The Rainbow Registry publicly displays the current status and history of each RCC, and all relevant documentation is accessible for review and feedback.

For example on transfer:

“Registry users may transfer RCCs between two Account Holders.

Transfer of RCCs are subject to the following rules:

- *Users can only transfer RCCs that they own; and*
- *Users can only transfer RCCs to Buyers who have an active registry account.*

All transfer events shall be recorded on the Rainbow registry with the former owner of the units and the recipient.

The Rainbow registry shall ensure that transactions are secure, with a double validation system, requiring both sender and recipient to acknowledge and validate the transfer.

Rainbow does not allow any transfer of RCCs outside of the Rainbow registry.”

Example of retirement on the Rainbow registry, showing issuance and intermediary transfers:

137 credits retired by Cloverly on behalf of Wascosa Group Holding S.A.R.L.

Issuance (Aug 29, 2024): Verification - 341 credits issued to Vieille Materiaux

Transfer (Feb 24, 2026): Transfer - 137 credits transferred

Retirement (Feb 24, 2026): Retirement - 137 credits retired by Cloverly

General information		Transaction details		Credits details	
Retired by	Cloverly	Amount	137 tCO ₂ e _q	Mechanism	Removal
On behalf of	Wascosa Group Holding S.A.R.L.	Completed at	24/02/2026	Credit IDs	RIV-FR-25-RMV-2023-2a97e/205:341
Reason	CO2 Compensation for 2025	Transaction ID	ce27623f-4d33-48d0-b087-e64beb6e363b	Vintage year	2023
Certificate	Download				

Retirement certificate

Project information [Go to project](#)

Status Credited

Developed by Vieille Materiaux

Étalans, FR

Publicly available at this weblink:

<https://registry.rainbowstandard.io/ledger/transactions/ce27623f-4d33-48d0-b087-e64beb6e363b>

The procedures for issuance, transfer, cancelation and retirements can be found in the Rainbow Procedures Manual, section Rainbow Carbon Credit, publicly available at :

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#issuance>

The Rainbow Registry is publicly accessible at this weblink: <https://registry.rainbowstandard.io>

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

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:

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

- a) Rainbow is administered by the Rainbow Executive team and the Secretariat. Then each of the following teams coordinate and have clear scopes:
- The Science Team oversees the scientific rigor of Rainbow’s methodologies.
 - The Certification Team ensures transparent and accurate project assessments.
 - The Product & Tech Team develops and maintains the digital platforms that support the Rainbow Standard’s implementation (e.g. certification platform and registry).

Rainbow Secretariat is currently formed of the following members of the executive team:

- Erica Dorr
- Clément Georget

The procedure mentioned about the Secretariat:

“The Executive Team leads Rainbow’s day-to-day operations and long-term strategic execution. Their responsibilities include:

- *Overseeing the operations and implementation of the Standard*
- *Making decisions by majority vote within the team*
- *Appointing members to the SAB*
- *Ensuring financial sustainability and legal compliance*

The Executive Team is appointed collectively by the shareholders of Reverse SAS in accordance with the statutes.”

The procedure mentioned about the Secretariat:

“The Secretariat coordinates governance processes and cross-team communication. Its main tasks include:

- *Preparing and consolidating proposed changes to Rainbow Standard documentation*
- *Facilitating information flow between teams and the SAB*
- *Organizing public consultations and managing stakeholder feedback*
- *Organizing the Rainbow Annual Report*
- *Oversight of VVBs including managing accreditation applications, performance reviews and sanctions.”*

- i) Rainbow Standard Rules, section Overview of Rainbow, paragraph “Governance and teams”, publicly available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/organization-of-rainbow#id-3znysh7>

- ii) Rainbow Procedures Manual, section Governance and oversight, paragraph “Main stakeholders”
 - 1) Executive team:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#main-stakeholders>
 - 2) Secretariat:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#secretariat>
 - 3) Science team:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#science-team>
 - 4) Certification team:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#certification-team>
 - 5) Product & tech team:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#product-and-tech-team>
 - 6) Partnership team:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#partnerships-team>
- iii) The Executive team can be found publicly on Rainbow website at:
<https://rainbowstandard.io/about>

- b) Rainbow publicly discloses its decision-making processes, including the roles of the Standard Advisory Board (SAB), the Rainbow Science Team, and the Secretariat. Decisions regarding revisions to the Standard Rules and methodologies are made through a structured process involving public consultation, feedback analysis, and validation by the SAB.

For example the approval phase of standard revision:

“Approval Phase

Integration of Public Feedback: the Secretariat integrates feedback from the public consultation into the draft update to the Standard Documentation.

SAB Review and Approval: The draft update to the Standard Documentation is submitted to the SAB for final approval. The SAB ensures that feedback from the public consultation phase, as well as their own comments, has been appropriately incorporated or that adequate justification is provided for any feedback not adopted.

Implementation: The Science team implements the approved revisions into the Rainbow Standard Documentation and any affiliated documents. All changes are documented in the Version History, previous versions are archived, and changes to certification are implemented.”

The decision making process is documented and publicly available at:

- i) Procedures for standard revisions can be found in the Rainbow Procedures Manual, section Standard and methodologies, publicly available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/standard-and-methodologies>
- ii) Decisions and meeting notes can be found in Administrative Oversight Record can be found at: <https://docs.rainbowstandard.io/other/administrative-oversight>
- iii) Procedures for Public Consultations can be found in the Rainbow Procedures Manual, section Standard and methodologies, publicly available at <https://docs.rainbowstandard.io/rainbow-standard-documents/public-consultations>
- iv) The Rainbow registry records issuance, project validation and is publicly available at: <https://registry.rainbowstandard.io>
- v) Rainbow Procedures Manual, Governance and oversight, Documentation management system: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#documentation-management-system>

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

N/A

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? (<i>Paragraph 2.7.4</i>)	<input checked="" 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):

Rainbow, operated by Riverse SAS, maintains a professional liability insurance policy with coverage of at least 9 million euros. This policy is in place to ensure financial protection and operational integrity in the administration of the Rainbow carbon crediting programme.

The insurance policy will be shared confidentially with TAB.

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

N/A

Q4. Can the programme demonstrate that it has been... (<i>Paragraph 2.7.2</i>)	
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

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.

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) Rainbow, operated by Riverse SAS, has been continuously governed since its establishment in 2021. The Standard Advisory Board (SAB), Executive Team, and other governance bodies have been actively overseeing the programme’s development, standard updates, and operational decisions.
 - i) The governance structure and ongoing activities are documented on the Rainbow Standard Rules: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/organization-of-rainbow>
 - ii) The procedures relating to Governance can be found in the Rainbow Procedures Manual: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight>
 - iii) The governance related decisions since the SAB creation can be found here: <https://docs.rainbowstandard.io/other/administrative-oversight>
- b) Rainbow has been continuously operational since 2021, with its platform, registry, and certification processes active and publicly documented. The Rainbow Registry and regular updates to the Standard Rules and methodologies provide evidence of ongoing operations. Previous versions and public consultations are archived and accessible, demonstrating operational continuity.
 - i) The Rainbow Standard Rules version history and change log can be found at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/version-history>
 - ii) The first issuance was completed on the Rainbow Registry on April 2023 and can be found publicly at this weblink: <https://registry.rainbowstandard.io/ledger/transactions/ed8a6b24-34df-4543-8f67-7db8d85db043>
 - iii) The first Standard Advisory Board meeting was held on April 27th 2023 and meeting notes are publicly available at this weblink: <https://docs.rainbowstandard.io/other/administrative-oversight#standard-advisory-board-meeting-notes>

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

N/A

Q5. Does the programme have in place... (<i>Paragraph 2.7.2</i>)	
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) Rainbow has a Long-term Administration Plan for the administration of its multi-decadal programme elements.
- b) Rainbow has established a wind-down policy to address the dissolution of the programme in its current form.

Those plans are considered confidential and will be shared confidentially directly with the application review committee as part of the formal submission process.

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

N/A

Criteria: Multiple (re: Conflicts of interest)

Q6. Are policies and robust procedures in place ¹³ to... (<i>Paragraph 2.7.3</i>)	
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) Rainbow has implemented a comprehensive [Conflict of Interest \(COI\) Policy](#), which applies to all programme administrators, staff, board members, and management. This policy is designed to prevent financial, commercial, or fiduciary conflicts of interest in the governance and provision of programme services.

The COI Policy defines a conflict of interest as follow:

“A Conflict of interest is defined as a situation in which a person or organization is involved in multiple interests, financial or otherwise, and where serving one interest could involve working against – or in favor of - another. For Rainbow Programmes, this relates to situations in which the personal interest of an individual or organization might adversely affect the duty of the Programme to make an objective assessment of the carbon project and Rainbow Carbon Credit validity (such as its additionality assessment, volume of credits issued, etc.).”

And the Rainbow Procedures Manual clearly states that:

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.

“All individuals or entities involved in Rainbow’s certification or governance activities shall sign and adhere to the Rainbow Conflict of Interest Policy (COI Policy). The COI policy outlines the procedures to identify, declare, and manage potential or actual conflicts of interest across the Rainbow ecosystem.

The following stakeholders are explicitly bound by the Conflict of Interest Policy, and are detailed in sections below:

- *Members of the Standard Advisory Board*
- *Members of the Expert Community*
- *Members of the Governing Board*
- *Members of the Executive Team*
- *Validation and Verification Bodies (VVBs)*
- *Members of the Secretariat*
- *Members of the Science, Certification, Product & Tech, and Partnerships teams*
- *Other contractors involved in any Rainbow certification or registry procedure.”*

The COI Policy can be found on the Rainbow Documentation Hub, under Governance & Integrity and is publicly available at this weblink:

<https://docs.rainbowstandard.io/other/governance-and-integrity/conflict-of-interest-policy>

The conflict of interest procedure can be found in the Rainbow Procedures Manual, section Governance and oversight, section “Conflict of interest”, and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#conflict-of-interest>

- b) Rainbow’s Conflict of Interest Policy includes clear procedures for the declaration, management, and isolation of conflicts of interest *in Section 3.3 whereby, “Rainbow expects all employees to report and declare, both during the hiring process and afterward, any identified Conflicts of Interest. Standard Advisory Board members are responsible for managing these when they arise and for identifying potential Conflicts.”.* The policy outlines how actual or potential conflicts are identified, managed, and resolved. The Standard Advisory Board members are responsible for managing the potential conflicts.

Section 3.3 of the Conflicts of Interest Policy describes how conflicts of interest, if they arise, are managed.

“If a Conflict of Interest is identified in Rainbow, the due process is as follows:

- *At the time of identifying the Conflict, suspend all actions and direct or indirect involvement in the activities related to such Conflict, of the person(s) involved until it is determined that there is no Conflict of Interest.*
- *Inform the immediate superior in a timely manner and as soon as possible, submitting the General Declaration of Conflict of Interest form.*
- *Provide all necessary information and documentation to enable the superior and subsequently the members of the Standard Advisory Board to understand the matter in detail.*

- *The members of the Standard Advisory Board shall decide whether a Conflict of Interest exists.*
- *If a Conflict of Interest exists, the members of the Standard Advisory Board shall indicate the action to be taken in writing, as well as the person appointed to assess the case.*
- *There should be written evidence of the notification and management of the Conflict by the person involved and the board members.*
- *If it is concluded that the person involved is presenting a permanent Conflict of Interest that constantly affects the exercise of his or her functions, it should be analyzed whether the Conflict is a cause for termination of contract, due to the impossibility of exercising the position.*
 - *More generally, resolution measures can include:*
 - *Increased monitoring of the conflict by the line manager or the Standard Advisory Board.*
 - *The exclusion of the conflicted staff member from the sensitive information.*
 - *Restrictions to participate in discussions or decisions which may be subject to a Conflict of Interest.*
 - *Exemption of duties and assignment to another staff member.*
 - *Temporary or definite exclusion of the staff member from the relevant committee, steering group or management meeting.*
 - *Subject to disciplinary actions, up to and including termination of employment of the relevant staff member, in accordance with applicable law.”*

The COI Policy can be found on the Rainbow Documentation Hub, under Governance & Integrity and is publicly available at this weblink:

<https://docs.rainbowstandard.io/other/governance-and-integrity/conflict-of-interest-policy>

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... (<i>Paragraph 2.4.6</i>)	
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) Rainbow’s [Conflict of Interest Policy](#) explicitly covers registry administrators, ensuring that they are prohibited from having financial, commercial, or fiduciary conflicts of interest in the governance or provision of Rainbow Registry services. For example, Section 1, Purpose, *“This Conflict of Interest Policy applies to Rainbow’s Carbon Crediting Programme (the “Rainbow Programme”) and the Rainbow Registry operated by the Organization (“Rainbow Registry”).”* Furthermore, Section 2, Preventing and

Reporting Conflicts of Interest, *“All applicants for employment with Rainbow must agree that they have read and understood the principles and procedures set out in this section at the time of joining Rainbow and must complete the General Declaration of Conflict of Interest form. All persons involved in Rainbow operations should report, through regular channels of communication, their suspicions of possible Conflicts of Interest if they have evidence of any that is demonstrable.”.*

The COI Policy can be found on the Rainbow Documentation Hub, under Governance & Integrity and is publicly available at this weblink:

<https://docs.rainbowstandard.io/other/governance-and-integrity/conflict-of-interest-policy>

- b) Rainbow’s policy requires that any conflicts of interest involving registry administrators be formally declared, documented, and addressed through established procedures. These measures are designed to isolate and resolve conflicts, maintaining the integrity and impartiality of the Rainbow Registry and its operations.

In Section 3.3 of the Conflicts of Interest Policy, “Managing Conflicts of Interest:

“If a Conflict of Interest is identified in Rainbow, the due process is as follows:

- *At the time of identifying the Conflict, suspend all actions and direct or indirect involvement in the activities related to such Conflict, of the person(s) involved until it is determined that there is no Conflict of Interest.*
- *Inform the immediate superior in a timely manner and as soon as possible, submitting the General Declaration of Conflict of Interest form.*
- *Provide all necessary information and documentation to enable the superior and subsequently the members of the Standard Advisory Board to understand the matter in detail.*
- *The members of the Standard Advisory Board shall decide whether a Conflict of Interest exists.*
- *If a Conflict of Interest exists, the members of the Standard Advisory Board shall indicate the action to be taken in writing, as well as the person appointed to assess the case.*
- *There should be written evidence of the notification and management of the Conflict by the person involved and the board members.*
- *If it is concluded that the person involved is presenting a permanent Conflict of Interest that constantly affects the exercise of his or her functions, it should be analyzed whether the Conflict is a cause for termination of contract, due to the impossibility of exercising the position.*
- *More generally, resolution measures can include:*
 - *Increased monitoring of the conflict by the line manager or the Standard Advisory Board.*
 - *The exclusion of the conflicted staff member from the sensitive information.*
 - *Restrictions to participate in discussions or decisions which may be subject to a Conflict of Interest.*
 - *Exemption of duties and assignment to another staff member.*
 - *Temporary or definite exclusion of the staff member from the relevant committee, steering group or management meeting.*
 - *Subject to disciplinary actions, up to and including termination of employment of the relevant staff member, in accordance with applicable law.”*

The COI Policy can be found on the Rainbow Documentation Hub, under Governance & Integrity and is publicly available at this weblink:

<https://docs.rainbowstandard.io/other/governance-and-integrity/conflict-of-interest-policy>

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

N/A

Q8. Are provisions in place to ensure the independence of accredited third-party entities performing validation and/or verification procedures, including... (<i>Paragraph 3.3.3</i>)	
a) ...requiring accredited third-party(ies) to disclose whether they or any of their family members are dealing in, promoting, or otherwise have a fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated?	<input checked="" type="checkbox"/> YES
b) ...to manage and/or prevent conflicts of interest between accredited third-party(ies) and the programme and the activities it supports?	<input checked="" type="checkbox"/> YES
c) ...to address and isolate such conflicts, should they arise?	<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) Rainbow requires all accredited Validation and Verification Bodies (VVBs) to disclose any actual or potential conflicts of interest, including personal or fiduciary relationships related to the credits being evaluated.

For example the Procedures Manual, VVB Requirements states in the Validation and verification process that:

"A Conflict of Interest (COI) form shall be submitted to Rainbow's Certification team for the audit team for each validation and verification audit."

And in Audits teams:

"The auditors chosen by the VVB to audit a specific project shall meet the following requirements:

- *be independent of the activity being audited;*
- *be free from conflict of interest, for instance not being involved simultaneously in consultancy and audit with the same Project Developer over the past three years previous to the audit;"*

These procedures can be found under:

- i) The Rainbow Procedures Manual, VVB requirements, section "Validation and verification process":
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-require>

[ments#validation-and-verification-process](https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#validation-and-verification-process)

- ii) The Rainbow Procedures Manual, VVB requirements, section “Audit teams”:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#audit-teams>

The COI Policy can be found on the Rainbow Documentation Hub, under Governance & Integrity and is publicly available at this weblink:

<https://docs.rainbowstandard.io/other/governance-and-integrity/conflict-of-interest-policy>

- b) Prior to their accreditation VVB shall adhere to the COI Policy by following these rules:

“If approved, the VVB shall:

- *submit a signed copy of the Rainbow Conflict of Interest Policy, and*
- *submit a signed copy of the present Procedures Manual section on VVBs, and*
- *attend a training session for VVBs on the Rainbow Standard, relevant methodologies, and the Certification Platform, organized by the Rainbow Secretariat and the Certification team.*

Upon satisfactorily completing these steps, the Rainbow Secretariat delivers an accreditation to the VVB, allowing them to audit projects seeking validation and/or verification under the Rainbow program.”

To prevent conflicts of interest by VVBs, Rainbow has put in place a mandatory training to audit leaders where all aspects of the certification shall be covered.

“All Audit Leaders must attend a training on the Rainbow Standard and the relevant methodology before conducting any audits. Additionally, Audit Leaders shall undergo a training any time there is a major Standard or methodology release.”

Then for each validation and/or verification audit, VVB shall submit a COI form.

These procedures are publicly available at:

- i) Procedures Manual, VVB requirements, “Accreditation process”:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#accreditation-process>
- ii) Procedures Manual, VVB requirements, “VVB training”:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#vvb-training>
- iii) Procedures Manual, VVB requirements, “Validation and Verification process”:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#validation-and-verification-process>
- iv) COI declaration form: <https://i2fdkskubbk.typeform.com/to/kOgHVliX>

- c) In the event that conflicts of interest arise, Rainbow’s policies require that they be promptly addressed and isolated. The Conflict of Interest Policy provides a mechanism for reporting to the Secretariat and Standard Advisory Board, investigating, and resolving conflicts, ensuring the independence and integrity of the validation and verification process.

In Section 3.3 of the Conflicts of Interest Policy, “Managing Conflicts of Interest:

“If a Conflict of Interest is identified in Rainbow, the due process is as follows:

- *At the time of identifying the Conflict, suspend all actions and direct or indirect involvement in the activities related to such Conflict, of the person(s) involved until it is determined that there is no Conflict of Interest.*
- *Inform the immediate superior in a timely manner and as soon as possible, submitting the General Declaration of Conflict of Interest form.*
- *Provide all necessary information and documentation to enable the superior and subsequently the members of the Standard Advisory Board to understand the matter in detail.*
- *The members of the Standard Advisory Board shall decide whether a Conflict of Interest exists.*
- *If a Conflict of Interest exists, the members of the Standard Advisory Board shall indicate the action to be taken in writing, as well as the person appointed to assess the case.*
- *There should be written evidence of the notification and management of the Conflict by the person involved and the board members.*
- *If it is concluded that the person involved is presenting a permanent Conflict of Interest that constantly affects the exercise of his or her functions, it should be analyzed whether the Conflict is a cause for termination of contract, due to the impossibility of exercising the position.*
- *More generally, resolution measures can include:*
 - *Increased monitoring of the conflict by the line manager or the Standard Advisory Board.*
 - *The exclusion of the conflicted staff member from the sensitive information.*
 - *Restrictions to participate in discussions or decisions which may be subject to a Conflict of Interest.*
 - *Exemption of duties and assignment to another staff member.*
 - *Temporary or definite exclusion of the staff member from the relevant committee, steering group or management meeting.*
 - *Subject to disciplinary actions, up to and including termination of employment of the relevant staff member, in accordance with applicable law.”*

The COI Policy can be found on the Rainbow Documentation Hub, under Governance & Integrity and is publicly available at this weblink:

<https://docs.rainbowstandard.io/other/governance-and-integrity/conflict-of-interest-policy>

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):

Rainbow captures and makes available various information in the certification process and the operation of the program:

1. The Rainbow Procedures Manual, section Governance and Oversight, paragraph **Documentation Management System** states:

“Rainbow shall manage key governance, oversight, and certification documents in a transparent, accessible and durable manner.

General program documents, manuals, requirements, and policies shall be made publicly available on this documentation hub, available at <https://docs.rainbowstandard.io> .

Certification documents and records are stored in the Rainbow Certification Platform and on the registry [registry.rainbowstandard.io]. Their accessibility is described in the Project documentation page.

The Rainbow Annual Report describes Rainbow's operations including but not limited to non-conformities by Project Developers and VVBs, trainings, and complaints. This report shall be made publicly available on this documentation hub in the Administrative Oversight Record section [<https://docs.rainbowstandard.io/other/administrative-oversight>].”

This rule is published here:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#documentation-management-system>

2. During certification, Project Developer must use the Rainbow Certification platform to complete their PDD.

“Once the account is activated, the Rainbow team gives the Project Developer access to the Certification Platform and dMRV platform to submit all elements required for the Project Design Document (PDD), including data and proof files.”

The steps and details can be found in the Procedures Manual, section Project certification, publicly available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure>

Screenshot of Rainbow Certification platform, showing the source files uploaded by a Project Developer:

File Type	File Name	Description	Actions	Date
PDF	Pollution Sources and Standards of Cashew Nut Pr...	Mohod et al, 2010	[Copy]	Jan 20, 2026
PDF	Eurofins - Biochar Pollutants test report D2512200...	Sample 19 Dec 2025 This sample meet the requirements of the methodology for the pollutant threshold	[Copy] [1]	Jan 20, 2026
PDF	Default_GHG_Emission_Values_SFC_INDIA...		[Copy] [8]	Jan 20, 2026
XLS	air_emissions_calculations.xlsx	NO2 From 3 Feb 2025 to 17 May 2025 CH4 From 3 Feb 2025 to 14 June 2025	[Copy] [3]	Jan 20, 2026
XLS	Biochar_Deliveries_v2.xlsx	From 22 March 2025 to 23 June 2025 : 105 t biochar	[Copy] [3]	Jan 20, 2026
XLS	Biomass_Deliveries_v2.xlsx	From 19 Dec 2024 to 25 May 2025 : 265t biomass	[Copy] [3]	Jan 20, 2026
XLS	Combustion LPG calculations - EF.xlsx	Result : 2.672 kg CO2e / kg LPG	[Copy] [3]	Jan 20, 2026
PDF	Ashok Leyland 3116 IL mileage, Ashok Leyland truc...		[Copy] [10]	Jan 20, 2026
PDF	LPG_combustion_EPA.pdf		[Copy] [3]	Jan 20, 2026
PDF	Electricity emissions - May.pdf		[Copy] [10]	Jan 20, 2026
PDF	Electricity emissions - March.pdf		[Copy] [10]	Jan 20, 2026

Screenshot of Rainbow Certification platform, showing the requirement, the field to reply to the requirement and the attached source files.

The information and documentation collected during the process are made available to Rainbow Certification team and the relevant accredited VVB and auditors.

The Terms and Conditions defines the confidentiality in section 16 “Confidentiality”: *“Unless otherwise agreed in writing by the other party, the parties respectively undertake to keep confidential, for the duration of their contractual relationship and 3 years thereafter, all information relating to or held by the other party, of which they may have become aware during the conclusion and performance of their contractual relationship.”*

The terms and conditions for the Certification platform can be found on Rainbow Documentation Hub, under User Terms and Guidelines, and are available at this weblink: <https://docs.rainbowstandard.io/other/terms-and-contracts/terms-and-conditions-for-project-developer-s-mrv+-registry>

After validation the PDD, Monitoring report, Additionality template, the Risk assessment templates and the outcome of the Stakeholder consultation are made available and publicly accessible on the registry.

The Procedures Manual, in the section Registry Requirements paragraph “Project documents publicly available on the registry” available at <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#project-documents-publicly-available-on-the-registry> states:

“The following information must be publicly accessible in linked project documents available on the registry:

- *Demonstration of project compliance with the Rainbow Standard Rules and the applicable methodology. This includes, at a minimum:*
 - *Additionality template*
 - *ESS risk assessment template*
 - *Stakeholder consultation process and outcome”*

3. The Registry makes public all project related documents, including audit reports and monitoring reports.

The Procedures Manual states: *“The Rainbow Registry is the central platform for publishing project information, ensuring transparency, traceability, and accessibility. All projects must provide a minimum set of publicly available information on their registry page. This information may appear directly on the registry page, or within documentation linked from it, as detailed in below sections.”*

The related procedures to make information and documentation accessible can be found in the Procedures Manual, section Registry requirements, paragraph “Project documentation” and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#project-documentation>

Below is a screenshot example of a project page:

Carbon centric - France - Expansion of biochar production unit - Aquitaine

Access documents

Story Carbon Credit Volumes Cobenefits Infographics Documentation

Issued credits
980 tCO₂e_q

Estimated deliveries
10160 tCO₂e_q

General information

Status Credited

Developed by Carbon centric

Project ID RIV-2025-PROJ-106

Validation & verification body [Carbon Check \(India\) Private Limited](#)

Protocol details

Mechanism Removal

Labels

Methodology [Biomass carbon removal and storage](#)



Timeline:

- Jan 01, 2025**: Start of crediting period
Carbon centric's activities qualify for credits
- Jul 18, 2025**: Validation
Carbon Check (India) Private Limited confirmed eligibility
- Jul 21, 2025**: Issued 663 credits
Verified by Carbon Check (India) Private Limited
- Dec 15, 2025**: Issued 317 credits
Verified by Carbon Check (India) Private Limited
- Dec 15, 2025**: Issued 317 credits
Verified by Carbon Check (India) Private Limited

Link to example: <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-106>

By either clicking on “documentation” link or scrolling down the documents can be accessed. Below is a screenshot example of the document section of a project page:

Project Documentation

Document	Period	Published	Links
Project Design Document (PDD)		Jul 16, 2025	Open document
Monitoring & Verification Audit Report	Jan/2025 to Apr/2025	Jul 18, 2025	Open document
Validation Audit Report		Jul 18, 2025	Open document
Monitoring Report	May/2025 to Sept/2025	Dec 15, 2025	Open document
Verification Audit Report	May/2025 to Sept/2025	Dec 15, 2025	Open document

- The Rainbow Annual Report, published by April 30th each year, provides a comprehensive overview of operations. The procedure for publishing the annual report can be found in Procedures Manual, under Governance and oversight, paragraph “Rainbow Annual Report” at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/governance-and-oversight#rainbow-annual-report>

For example the past Annual report are available in Rainbow Documentation Hub, in Administrative Oversight Record available at this weblink:

<https://docs.rainbowstandard.io/other/administrative-oversight#rainbow-annual-activity-report>

2024 Annual report is available at this weblink directly:

<https://drive.google.com/file/d/117JUnsul6Hid988qTQI3HuB4MV9wlwjW/view>

5. Rainbow website, accessible publicly, gives comprehensive understanding of Rainbow activity, with direct access or the Registry. In particular the page Standard available at <https://rainbowstandard.io/standard> provides details on:
 - a. Rainbow Standard Advisory Board
 - b. Direct access to Rainbow Documentation Hub
 - c. Accredited VVBs
6. Rainbow conducts public consultations on standard documentation and methodology development that are made available to the public and any relevant stakeholder.

“The Secretariat initiates the public consultation through a Call for Consultation. This call is widely broadcasted through relevant channels to ensure maximum outreach, inviting Project Developers; carbon credit resellers, brokers, and marketplaces; net-zero engaged corporates; VVBs; climate and environmental scientists; and the general public to provide their insights and feedback on the topic. The minimum duration of the consultation is 30 days.

Rainbow shall provide an accessible mode of comment submission, through e.g. a dedicated platform or form. Stakeholders may also provide feedback via email, during a webinar, or in one-on-one meetings with the Rainbow Science team.”

“After the public consultation period, the Secretariat compiles all feedback, suggestions, and perspectives collected. The Rainbow Science team assesses and responds to each feedback, deciding and justifying whether to incorporate the feedback or not.

This collective feedback and the Rainbow Science team responses are summarized and published on the Rainbow Documentation Hub under the Closed public consultations section.”

All closed consultations can be found on the Rainbow Documentation Hub under Public consultations and are publicly available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/public-consultations#closed-public-consultations>

The procedure related to Public consultations can be found in the Procedures Manual, section Standard and Methodologies, section “Public Consultation” and is publicly accessible at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/standard-and-methodologies#public-consultation>

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

N/A

Q10. Does the programme publicly disclose its local stakeholder consultation requirements (if applicable)? (<i>Paragraph 2.8</i>)	<input checked="" type="checkbox"/> YES
---	---

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):

Rainbow has clarified the requirement for its local stakeholder consultation requirements and include:

- **Mandatory stakeholder consultation** for all projects, involving all relevant local stakeholders who may be directly or indirectly affected by the project.
- A **communication letter** sent to all relevant stakeholders and **at least one meeting** with stakeholders.
- A **30-day public comment period** on the Rainbow Registry for each project, during which stakeholders can review project details and provide feedback.
- Documentation of all stakeholder feedback and resulting changes in the publicly available project documentation.
- For projects involving Indigenous Peoples and Local Communities (IPLCs), **Free, Prior, and Informed Consent (FPIC)** must be obtained and documented.
- All consultation outcomes and stakeholder lists are included in the Project Design Document (PDD) and made available on the Rainbow Registry.

Quoting from the rules:

“Project Developers shall engage with all relevant local stakeholders who may be directly or indirectly affected by the project’s design, development, implementation, or operations. The goal is to inform stakeholders of project details, gather feedback, ensure their views are considered, and establish a pathway for communication or grievances throughout the project lifetime.

Project Developers shall thoroughly identify and document all relevant stakeholders.”

The requirements for local stakeholders consultation can be found in the Rainbow Standard Rules, section Principles and Requirements, paragraph Stakeholder consultation:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#stakeholder-consultation>

Rainbow also enable a public comment period on the registry:

Projects shall undergo a public comment period on the Rainbow Registry for at least 30 days, in parallel with or before the validation audit. The public comment period complements the project stakeholder consultation, and provides an open-access space where stakeholders can check the project details, provide feedback and raise concerns.”

Example of public comment period on the registry:

Rainbow carbon credit registry

The Rainbow Registry is a public ledger for carbon credits issued under the Rainbow Standard. It ensures full transparency on certified projects and credits, tracks carbon credits throughout their lifecycle—from issuance to retirement—and connects projects with resellers to facilitate transactions

Total verified climate impact

399,760 tCO₂eq

As of March 2, 2026

Projects Retired credits Issued credits Canceled credits

Q Search Columns

ID	NAME	MECHANISM	DEVELOPER	METHODOLOGY	COUNTRY	COBENEFITS	STATUS
IOJ-132	Earthrevive - India - Biochar facility alongside wood processing industry	Removal	Earthrevive	BICRS	India		Public comment period ↗
IOJ-146	Engrow - India - New biochar production unit	Removal	Engrow Carbon Energy	BICRS	India		Public comment period ↗
IOJ-119	O1th - Spain - Construction of wooden-structured buildings	Avoidance	O1th	Biobased Mat	Spain		Public comment period ↗

The status icon may be clicked to access the consultation form.

← Back

Removal Avoidance

Engrow - India - New biochar production unit

Story Carbon Credit Volumes Cobenefits Infographics Documentation

Estimated deliveries
12277 tCO₂eq

Link to form

General information

Status [Public comment period \[↗\]\(#\)](#)

Developed by Engrow Carbon Energy

Project ID RIV-2025-PROJ-146

Protocol details

Mechanism Removal

Labels

Methodology **Biomass carbon removal and storage**



Jan 01, 2025

The requirements for the public comment period can be found in the Rainbow Procedures Manual, section Project Certification Procedure:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-proced>

[ure#public-comment-period](#)

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

N/A

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

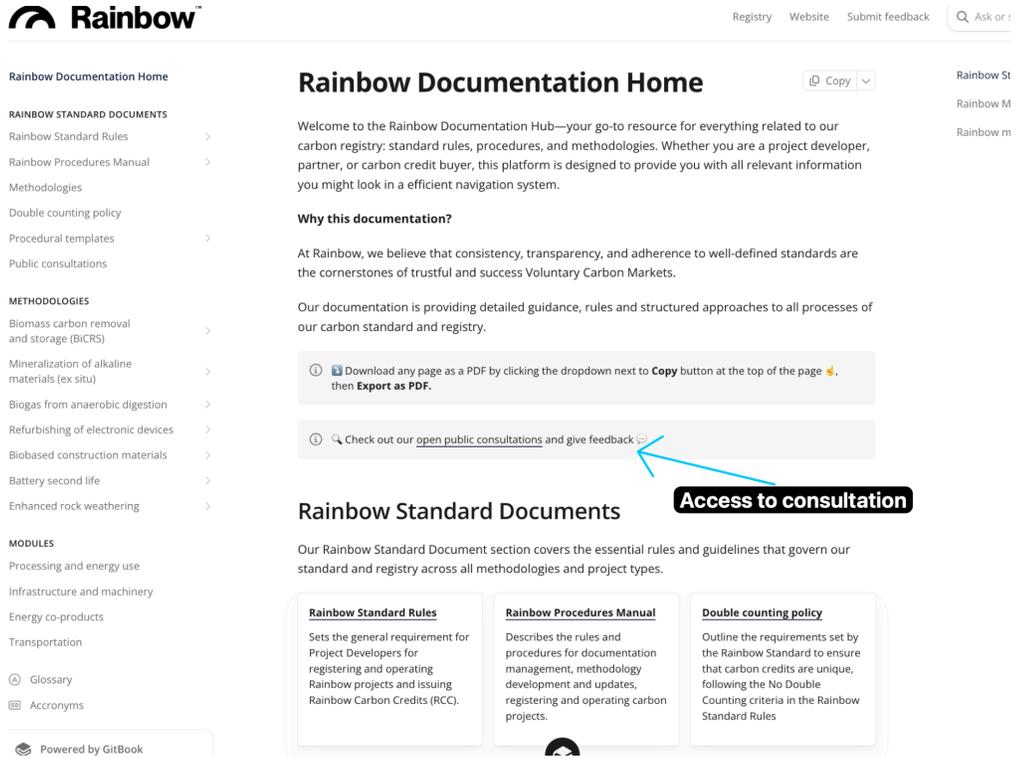
i) public stakeholder consultations for new methodologies, major methodology revisions, and major standard or procedures revision.

“Public consultations are mandatory for:

- *major revisions of the Rainbow Standard Documents*
- *major revisions of a methodology and module and*
- *creation of new methodologies and modules.”*

They are open for a minimum of 30 days.

Screenshot to access public consultations:



“After the public consultation period, the Secretariat compiles all feedback, suggestions, and perspectives collected. The Rainbow Science team assesses and responds to each feedback, deciding and justifying whether to incorporate the feedback or not.

This collective feedback and the Rainbow Science team responses are summarized and published on the Rainbow Documentation Hub under the Closed public consultations section.”

All closed consultation, with comments received and Rainbow’s responses, can be found on the Rainbow Documentation Hub under Public consultations and are publicly available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/public-consultations#closed-public-consultations>

The procedure related to Public consultations can be found in the Procedures Manual, section Standard and Methodologies, section “Public Consultation” and is publicly accessible at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/standard-and-methodologies#public-consultation>

ii) Rainbow requires a public comment period for all projects seeking registration.

“Projects shall undergo a public comment period on the Rainbow Registry for at least 30 days, in parallel with or before the validation audit. The public comment period complements the project stakeholder consultation, and provides an open-access space where stakeholders can check the

project details, provide feedback and raise concerns.”

The requirements for the public comment period can be found in the Rainbow Procedures Manual, section Project Certification Procedure:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#public-comment-period>

- iii) Rainbow encourages continuous stakeholder feedback, there is no formal public comment period for general operational activities.

“Open external feedback: Any interested party can provide feedback on the Rainbow Standard Rules and methodologies at any time. The latest versions of all documentation are published on Rainbow’s website, enabling continuous input—not just during public consultations.

All interested parties, irrespective of their background or involvement, are encouraged to continuously provide their feedback on the current Rainbow Standard Documentation. They can do so by email at hello@rainbowstandard.io, or via this form[<https://rainbowstandard.io/general-inquiries>].”

The procedure for continuous feedback can be found in the Rainbow Procedures Manual, under Standard and Methodologies, section “Revising Rainbow Standard Documentation”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/standard-and-methodologies#feedback-collection-phase>

- iv) For major additions or revisions to programme procedures or rulesets (e.g. *Rainbow Standard Documents*), the same procedure described in in (i) applies
- b) Public comment provisions
 - i) Public consultations are publicly accessible through the Rainbow Documentation Hub. Rainbow Science team prepares a dedicated form that is sent to stakeholders subscribed to methodology development topics at Rainbow.

Example of public consultations:

RAINBOW STANDARD DOCUMENTS

Copy

Public consultations

Explore the results of our public consultations, including feedback summaries and responses that drive improvements in our standards and methodologies.

Open public consultations

Public consultations are open for a minimum of 30 days. All relevant details can be accessed here with the results of these consultations.

The **Rainbow Distributed open-kiln biochar methodology** is open for public consultation, from February 6th to March 11th.

👉 Provide your feedback [here](#) ↗!

👉 Read the methodology [here](#) ↗!

The **Rainbow Distributed closed-kiln biochar methodology** is open for public consultation, from February 6th to March 11th.

👉 Provide your feedback [here](#) ↗!

👉 Read the methodology [here](#) ↗!

Would you like to be notified of future consultations? Please [contact us](#).

For example, the link to last consultation form: <https://tally.so/r/KY1JZV>

- ii) For Project public comment period, the registry clearly label the status and provides at link to a dedicated form

Example of public comment period on the registry:

Rainbow carbon credit registry

The Rainbow Registry is a public ledger for carbon credits issued under the Rainbow Standard. It ensures full transparency on certified projects and credits, tracks carbon credits throughout their lifecycle—from issuance to retirement—and connects projects with resellers to facilitate transactions

Total verified climate impact

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As of March 2, 2026

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Search

NAME	MECHANISM	DEVELOPER	METHODOLOGY	COUNTRY	COBENEFITS	STATUS
IOJ-132 Earthreive - India - Biochar facility alongside wood processing industry	Removal	Earthreive	BICRS	India		Public comment period ↗
IOJ-146 Engrow - India - New biochar production unit	Removal	Engrow Carbon Energy	BICRS	India		Public comment period ↗
IOJ-119 0th - Spain - Construction of wooden-structured buildings	Avoidance	0th	Biobased Mat	Spain		Public comment period ↗

The status icon may be clicked to access the consultation form.

← Back Removal Avoidance

Engrow - India - New biochar production unit

Story Carbon Credit Volumes Cobenefits Infographics Documentation

Estimated deliveries
12277 tCO₂e/eq

Link to form

General information

Status Public comment period

Developed by Engrow Carbon Energy

Project ID RIV-2025-PROJ-146

Protocol details

Mechanism Removal

Labels

Methodology **Biomass carbon removal and storage**



Jan 01, 2025

c) How comments are considered

- i) All closed methodology and standard consultations can be found on the Rainbow Documentation Hub under Public consultations and are publicly available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/public-consultations#closed-public-consultations>

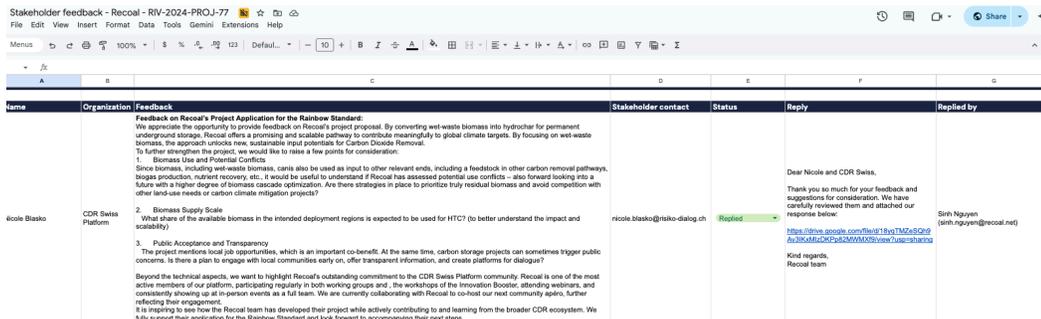
Example of response summary on the Enhanced Rock Weathering methodology: <https://drive.google.com/file/d/1o3QMayuIqBfXPnkWdc1CpQPQC5ItBgtH/view>

- ii) When comments are submitted they are gathered in a spreadsheet attached to the PDD. Comments shall be answered and addressed if any concerns are raised.

For example:

https://docs.google.com/spreadsheets/d/1TIi9d9EykkZ1bmDB2QazNnOkkDOgH734QlO2Wp_mOTc/edit?gid=1985359524#gid=1985359524

Screenshot:



Name	Organization	Feedback	Stakeholder contact	Status	Reply	Replied by
nicole Blasko	CDR Swiss Platform	<p>Feedback on Recoal's Project Application for the Rainbow Standard: We appreciate the opportunity to provide feedback on Recoal's project proposal. By converting wet-waste biomass into hydrochar for permanent underground storage, Recoal offers a promising and scalable pathway to contribute meaningfully to global climate targets. By focusing on wet waste biomass, the approach unlocks new, sustainable input potentials for Carbon Dioxide Removal.</p> <p>To further strengthen the project, we would like to raise a few points for consideration:</p> <ol style="list-style-type: none"> Biomass Use and Potential Conflicts: Since biomass, including wet-waste biomass, can also be used as input to other relevant ends, including a feedstock in other carbon removal pathways, biogas production, nutrient recovery, etc., it would be useful to understand if Recoal has assessed potential use conflicts – also forward-looking into a future with a higher degree of biomass cascading optimization. Are there strategies in place to prioritize truly residual biomass and avoid competition with other land-use needs on carbon climate mitigation projects? Biomass Supply Scale: What share of the available biomass in the intended deployment regions is expected to be used for HTC? (to better understand the impact and scalability) Public Acceptance and Transparency: The project mentions local job opportunities, which is an important co-benefit. At the same time, carbon storage projects can sometimes trigger public concerns. Is there a plan to engage with local communities early on, offer transparent information, and create platforms for dialogue? <p>Beyond the technical aspects, we want to highlight Recoal's outstanding commitment to the CDR Swiss Platform community. Recoal is one of the most active members of our platform, participating regularly in both working groups and the workshops of the Innovation Booster, attending webinars, and consistently showing up at in-person events as a full team. We are currently collaborating with Recoal to co-host our next community apéro, further reflecting their engagement.</p> <p>It is inspiring to see how the Recoal team has developed their project while actively contributing to and learning from the broader CDR ecosystem. We fully support their application for the Rainbow Standard and look forward to accompanying their next steps.</p>	nicole.blasko@risiko-dialog.ch	Reviewed	<p>Dear Nicole and CDR Swiss,</p> <p>Thank you so much for your feedback and suggestions for consideration. We have carefully reviewed them and attached our response below:</p> <p>https://docs.google.com/spreadsheets/d/1BvY7M2a8Cz9Aq3K8M8C9p3AMN803/view?usp=sharing</p> <p>Kind regards, Recoal team</p>	Sinh Nguyen (sinh.nguyen@recoal.net)

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... (<i>Paragraph 2.9</i>)	
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) Rainbow has dedicated safeguards to address environmental risks, as outlined in the Environmental and Social Safeguards section. These include requirements for environmental risk assessment, mitigation, and monitoring throughout the project lifecycle, ensuring compliance with local, national, and international regulations.

“Project Developers shall assess material risks of negative environmental and social impacts or adverse outcomes that could potentially occur across the entire project scope (e.g., onsite, upstream, and downstream). The minimum list of safeguard principles and their general requirements listed in Table 1 below shall be evaluated for all projects, alongside any technology-specific requirements outlined in an applicable methodology. Risk assessment includes the following steps:

- *Any material negative environmental and/or social impacts or adverse outcomes shall be clearly documented in the PDD.*
- *Project Developers shall take measures to minimize and address these impacts in the project design, and document these mitigation measures in the PDD.*
- *Identified impacts and mitigation measures shall also be included in the Monitoring Plan, to ensure they are continuously tracked, addressed, and minimized throughout the project lifetime.*
- *Monitoring results shall inform project adaptation strategies to enhance environmental and social performance over time.*

Project Developers shall complete the methodology’s Risk Assessment Template for their project type, evaluating the likelihood and severity of all potential negative impacts or adverse outcomes that could result in violations of safeguard principles or misalignment with their associated requirements.”

The environmental risk safeguards are addressed in the Rainbow Standard Rules, Principles and requirement, section “Environmental and Social Safeguards”, publicly available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-r>

[requirements#environmental-and-social-safeguards](#)

Rainbow defines the minimum list of safeguard principles and their associated requirements, to be evaluated for all projects with the Risk assessment template.

Environmental and Social Safeguard risk assessment templates are accessible in the Rainbow Documentation Hub under Procedural templates and publicly available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/environmental-and-social-risk-assessment-templates>

- b) Rainbow Environmental and Social Safeguards section also addresses social risks, including labor rights, resource efficiency, pollution prevention, land acquisition, involuntary resettlement, and respect for human rights. Projects must conduct comprehensive stakeholder consultations and, where applicable, obtain Free, Prior, and Informed Consent (FPIC) from Indigenous Peoples and Local Communities (IPLCs).

The environmental risk safeguards are addressed in the Rainbow Standard Rules, Principles and requirement, section “Environmental and Social Safeguards”, publicly available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#environmental-and-social-safeguards>

- c) The list of safeguard principles can be found the Standard Rules, Principles and requirements, section Environmental and Social Safeguards accessible at: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#environmental-and-social-risk-assessment>

Table 1 The minimum list of safeguard principles and their associated requirements, to be evaluated for all projects.

Example extract:

Table 1 The minimum list of safeguard principles and their associated requirements, to be evaluated for all projects.

Safeguard Principle	Associated Requirements
Labor rights and working conditions	<ul style="list-style-type: none"> ● provide safe and healthy working conditions for employees ● provide fair treatment of all employees, avoiding discrimination and ensuring equal opportunities ● prohibit the use of forced labor, child labor, or trafficked persons, and protects contracted workers employed by third parties.
Resource efficiency and pollution prevention	<ul style="list-style-type: none"> ● minimize pollutant emissions to air ● minimize pollutant discharges to water, noise and vibration ● minimize generation of waste and release of hazardous materials, chemical pesticides and fertilizers
Land acquisition and involuntary resettlement	<ul style="list-style-type: none"> ● minimize forced physical and/or economic displacement
Biodiversity conservation and sustainable management of living natural resources	<ul style="list-style-type: none"> ● avoid and/or minimizes negative impacts on terrestrial and marine biodiversity and ecosystems ● protect the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity ● do not convert natural forests, grasslands, wetlands, or high conservation value habitats ● minimize soil degradation and soil erosion ● minimize water consumption and stress in the project

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

N/A

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):

Rainbow develops with each methodology a risk assessment template that Project Developer must use to identify, assess and manage the Environmental and Social risk.

“Project Developers shall complete the methodology’s Risk Assessment Template for their project type, evaluating the likelihood and severity of all potential negative impacts or adverse outcomes that could result in violations of safeguard principles or misalignment with their associated requirements.

Risks are identified in Risk Assessment Templates, which are provided in each methodology and tailored to the given project type. These templates guide Project Developers in evaluating the likelihood and severity of each risk type at project validation. Project Developers must assess the likelihood and severity scores of each risk for their specific project.

The Environmental and Social Risk Assessment template covers risk of environmental and social damages, and responds to the Environmental and Social Do No Harm criteria. This is evaluated to transparently identify environmental and social risks, and determine which risks shall be monitored on an ongoing basis.

Each identified material risk (defined as issues with a risk score of moderate or higher) is subject to creation of a risk mitigation plan, developed by the Project Developer, that details the long-term strategies and investments for preventing, monitoring, reporting and compensating carbon removal reversal and/or environmental and social damages.”

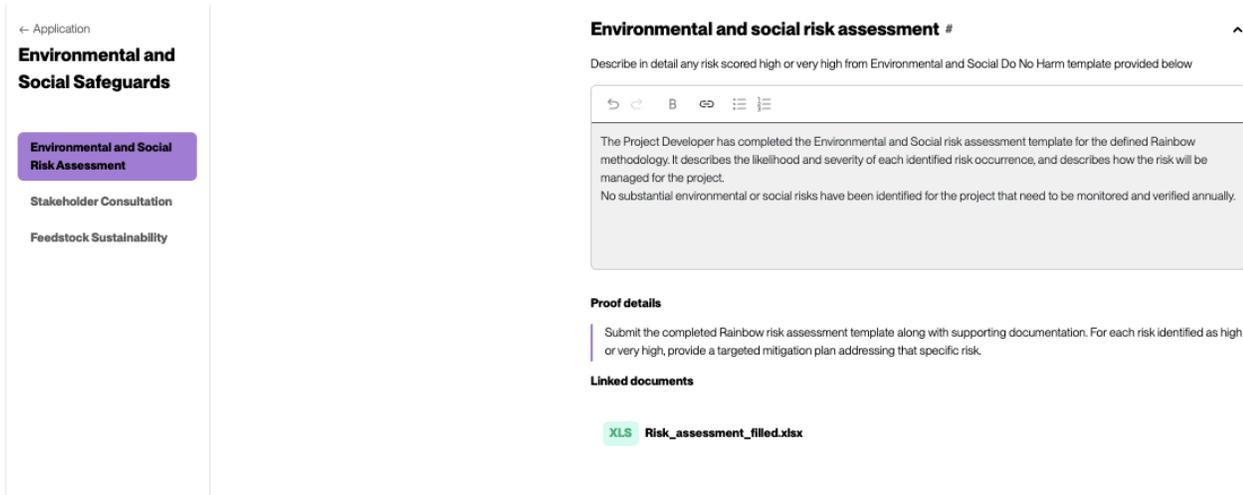
The requirement for the use of the risk assessment template are addressed in the Rainbow Standard Rules, Principles and requirement, section “Environmental and Social Safeguards”, publicly available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#environmental-and-social-safeguards>

For examples:

- Module Biomass:
<https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-capture/biomass-feedstock#id-82n4j72vjt9v>
- Biochar application to soil:
<https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-storage/biochar-application-to-soils#id-82n4j72vjt9v>

Environmental and Social Safeguard risk assessment templates are accessible in the Rainbow Documentation Hub under Procedural templates and publicly available at this weblink: <https://docs.rainbowstandard.io/procedural-templates/environmental-and-social-risk-assessment-templates>

Project Developer submit the risk assessment template through the certification platform:



The Rainbow Certification team reviews it and checks the completeness and accuracy of it.

Rainbow sends the Risk assessment template along with the PDD and other materials in the audit package for the Validation audit to the VVB in charge of the audit. The procedure for the Validation audit can be found in Procedures Manual, Project certification, paragraph “Validation audit” available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation-audit>

After validation the ESS risk evaluation of projects is available through the link provided in the publicly available PDD on the registry.

Here are some examples:

- <https://docs.google.com/spreadsheets/d/1AUy6rT8DUyEZfO3nTlLwr3I-lhUKDFpeGtKcxO-1ffA/edit?gid=1985359524#gid=1985359524>
- <https://docs.google.com/spreadsheets/d/1sY8Fc7qlwdto5bPdU54CyuJ4Ts9vakxXXbrwWjW5Wvo/edit?usp=sharing>
- <https://arc.rainbowstandard.io/document/8d9ae60f-de47-49f7-99e4-0cdd5c4634cf>

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

Following the release of Standard Rules Version 7 (V7) in January, several methodologies are currently still under revision. Updated ESS Risk Assessment Templates will be made available as part of these revisions. The expected timeline for completion is by the end of Q2 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) Rainbow has established dedicated processes and procedures to implement, monitor, and enforce its environmental and social safeguards. These include:

- **Methodology-specific Risk Assessment Templates** provided to Project Developers, guiding the identification, evaluation, and mitigation of environmental and social risks.

Environmental and Social Safeguard risk assessment templates are accessible in the Rainbow Documentation Hub under Procedural templates and publicly available at this weblink:

<https://docs.rainbowstandard.io/procedural-templates/environmental-and-social-risk-assessment-templates>

- **Rainbow Certification Team** that reviews project documentation, risk assessments, and mitigation plans.
- **Validation: Validation and Verification Bodies (VVBs)** are responsible for auditing project compliance with safeguard requirements. The procedure for the Validation audit can be found in Procedures Manual, Project certification, paragraph “Validation audit” available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation-audit>
- **Verification: Monitoring Plans** integrated into each project, requiring regular reporting and audits to ensure ongoing compliance.

“Monitoring Plans shall include parameters that are:

- *material to GHG quantification,*
- *critical for determining project eligibility, including but not limited to environmental and social risks and leakage,*
- *critical to confirm the mitigation measures established in the Environmental and social risk assessment are in place,*
- *critical to confirm the measures established in the Reversal risk assessment are in place,*
- *quantify the claimed co-benefits.”*

The requirement for Monitoring can be found in Standard Rules, Principles and requirements, section “Monitoring”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#monitoring>

The Monitoring template include the mitigation measures to be tracked:

Mitigation measures from in the ESS & Reversal risk assessment

The following mitigation measures were audited as part of the project's Environmental and Social Safeguard Risk Assessment and Reversal risk assessment. These measures are monitored in accordance with the project's Monitoring Plan, as detailed in the Project Design Document (PDD).

Table 3. Audited mitigation measures

Mitigation measure	Audited measure or Parameter	Sources
Mitigation measures 1		

The Monitoring report template can be found on the Rainbow Documentation Hub, in Procedural templates, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/annual-monitoring-template>

- **Complaints and Appeals Policy** for stakeholders to report concerns, with formal mechanisms for investigation and resolution. The complaints and Appeal policy can be found on the Rainbow Documentation Hub, in Governance & Integrity and is available at this weblink: <https://docs.rainbowstandard.io/other/governance-and-integrity/complaints-and-appeals-policy>
- b) Yes, as references above to each example given. For the avoidance of doubt, all relevant institutions, processes, and procedures are publicly disclosed:
 - i) Environmental and Social Safeguard risk assessment templates are accessible in the Rainbow Documentation Hub under Procedural templates and publicly available at this weblink: <https://docs.rainbowstandard.io/procedural-templates/environmental-and-social-risk-assessment-templates>
 - ii) The Monitoring report template can be found on the Rainbow Documentation Hub, in Procedural templates, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/annual-monitoring-template>
 - iii) The procedure for the Validation audit can be found in Procedures Manual, Project certification, paragraph "Validation audit" available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation-audit>

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

N/A

Q15. Are procedures in place to ensure that offset projects do not violate local,	<input checked="" type="checkbox"/> YES
---	---

state/provincial, national or international regulations or obligations? (<i>Paragraph 3.8</i>)	
--	--

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):

Rainbow requires all projects to comply with all applicable local, state/provincial, national, and international regulations. Project Developers must provide relevant documentation (such as permits, licenses, or regulatory applications) at the start of the project. Compliance is checked by the Rainbow Certification Team and is audited by Validation and Verification Bodies (VVBs). These requirements are detailed in the Environmental and Social Safeguards section of the Rainbow Standard, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#environmental-and-social-safeguards>

Specific requirements in the Environmental and Social Safeguards section, *“Project activities shall comply with all applicable local, state, national, and international regulations. Project Developers shall provide any relevant documentation (such as permits, licenses, or regulatory applications) obtained at the start of the project, or on an ongoing basis, to demonstrate this compliance. Depending on the methodology used, **additional evidence may be required** to confirm adherence to regulations specific to the project’s technology type.”*

This requirement is enforced through the project certification and monitoring process. The monitoring requirements are detailed in the Standard Rules, section Monitoring, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#monitoring>

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

Rainbow is updating the General Terms & Conditions for Certification Platform Accounts, the new terms states:

“The Project Developer agrees to use its best efforts to assist Rainbow in fulfilling any legal or regulatory requirements, including providing all information and documentation reasonably requested by Rainbow to comply with applicable laws, Know-Your-Customer (KYC) policies, and anti-fraud obligations.”

The Terms are currently in consultation period, which is 45 days in length, will officially close on March 30, 2026, subsequent to the notification of customers.

During the consultation period, the terms and conditions can be found at: <https://docs.rainbowstandard.io/~ /changes/231/other/terms-and-contracts/terms-and-conditions-for-project-developers-mrv+-registry>

After March 30th, they will be accessible in the Rainbow Documentation Hub in User terms and guidelines: <https://docs.rainbowstandard.io/other/terms-and-contracts/terms-and-conditions-for-project-developers-mrv+-registry>

Criterion: Sustainable development criteriaQ16. Does the programme use sustainable development criteria? (*Paragraph 2.10*) 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):

Rainbow integrates sustainable development criteria into its projects, whereby projects should support at least two **quantifiable and verifiable** environmental or social co-benefits, aligned with the UN Sustainable Development Goals (SDG) framework. These co-benefits must be documented, monitored, and audited by a third-party Validation and Verification Body (VVB) throughout the project lifecycle. The criteria and process for assessing co-benefits are publicly disclosed in the Co-benefits section of the Rainbow Standard Rules, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#co-benefits>

“Projects should support at least two quantifiable and verifiable environmental or social co-benefits, aligned with the UN SDG framework. If a Project Developer claims co-benefits, these:

- *must be in addition to climate benefits already accounted for in the issuance of RCCs, and*
- *must be positive environmental or social impacts that are substantial and additional.*

Claimed co-benefits shall be quantified and audited by a VVB using one of the following methods:

- *the project’s GHG quantification results, calculated using the Rainbow MRV platform and the corresponding methodology quantification model,*
- *primary data collection from the project (e.g. value displayed on an invoice),*
- *an LCA of the project or similar technology, or*
- *other reputable scientific documents, calculated by the Project Developer in a separate file and shared with the VVB and the Rainbow team.*

Project Developers shall provide information in the PDD on any standardized tools and methods that were used to assess the co-benefits.

All claimed co-benefits shall be monitored by the Project Developer. They shall be:

- *included in the project’s Monitoring Plan,*
- *updated with supporting evidence at each credit verification, and*
- *audited by a third-party VVB.”*

Each project’s registry page on the Rainbow Registry (<https://registry.rainbowstandard.io>) details the specific SDGs addressed. For example:

Story Carbon Credit Volumes **Cobenefits** Infographics Documentation



UN SDG

Cobenefits



Explanation from the PDD

Indicator → 10 µg/m³
OF AVOIDED PM EMISSIONS
PER RCC

Engrow recovers cashew nut shell cake, a byproduct that would otherwise be burned in open fields, generating harmful air pollution—a major public health concern in India. Through its biochar production, Engrow avoids the emission of 5.1 kg of particulate matter (PM) per RCC. This reduction is particularly meaningful given that the World Health Organization recommends a maximum annual PM_{2.5} exposure of 5 µg/m³, while India's national limit is set at 40 µg/m³. By preventing these emissions, Engrow directly helps lower exposure to hazardous pollutants, thereby reducing respiratory and cardiovascular diseases in affected communities.

Weblink of example: <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-146>

Since the Rainbow Standard Rules V7, the details of calculation are mandatory in the PDD.

Example of PDD:

6. Co-benefits

6.1. #3 Good health and well-being

Sub-goal 3.9 : "By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination."

Engrow actively contributes to this goal by addressing the critical issue of air pollution caused by agricultural residue burning in India.

Engrow recovers cashew nut shell cake, a byproduct that would otherwise be burned in open fields, generating harmful air pollution—a major public health concern in India. Through its biochar production, Engrow avoids the emission of 5.1 kg of particulate matter (PM) per RCC.



Project Design Document

49

» 50/56

Project Design Document - Engrow

In a localized area of 1 km² with a 500-meter atmospheric mixing height, this reduction equates to a decrease of 17 µg/m³ of PM per tonne of biochar, or 10 µg/m³ per Removal Carbon Credit (RCC). This reduction is particularly meaningful given that the WHO recommends a maximum annual PM_{2.5} exposure of 5 µg/m³, while India's national limit is set at 40 µg/m³. By preventing these emissions, Engrow directly helps lower exposure to hazardous pollutants, thereby reducing respiratory and cardiovascular diseases in affected communities.

Monitoring outcomes :

- Avoided PM emissions per vintage year (kg/RCC) : $\frac{PM\ emission * Amount\ of\ CNSC}{RCC}$

with

- *PM emission* the amount of PM emitted when burning 1 tonne of agricultural residue (3 kg/ t CNSC)
- *Amount of CNSC (tonnes)* for the considered vintage year
- *RCC* Number of Rainbow Carbon Credits for the considered vintage year

Examples of PDD certified under V7 or later:

- <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-146>
- <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-132>

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

<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>	<p><input checked="" type="checkbox"/> YES</p>
--	--

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):

Rainbow provides a framework for identifying and reporting sustainable development indicators. Projects are required to align their claimed co-benefits with the SDG framework, and these alignments are documented in the Project Design Document (PDD) and on the project’s page in the Rainbow Registry. Examples can be found in the answer to the previous question.

“Projects should support at least two quantifiable and verifiable environmental or social co-benefits, aligned with the UN SDG framework. If a Project Developer claims co-benefits, these must:

- *be in addition to climate benefits already accounted for in the issuance of RCCs,*
- *be positive environmental or social impacts that are substantial and additional, and*
- *if applicable, include any SGD indicators that are required by the host country.”*

“Claimed co-benefits shall be quantified and audited by a VVB using one of the following methods:

- *the project’s GHG quantification results, calculated using the Rainbow MRV platform and the corresponding methodology quantification model,*
- *primary data collection from the project (e.g. value displayed on an invoice),*
- *an LCA of the project or similar technology, or*
- *other reputable scientific documents, calculated by the Project Developer in a separate file and shared with the VVB and the Rainbow team.*

Project Developers shall provide information in the PDD on any standardized tools and methods that were used to assess the co-benefits.

Claimed co-benefits shall be monitored by the Project Developer. They shall be:

- *included in the project’s Monitoring Plan,*
- *updated with supporting evidence at each credit verification, and*
- *audited by a third-party VVB.”*

Requirements related to the cobenefits can be found in the Procedures Manual, section Principles and requirements, paragraph “Cobenefits”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#co-benefits>

Rainbow provides a fixed list of most common co-benefits for each methodology under the Co-benefit section,

for example:

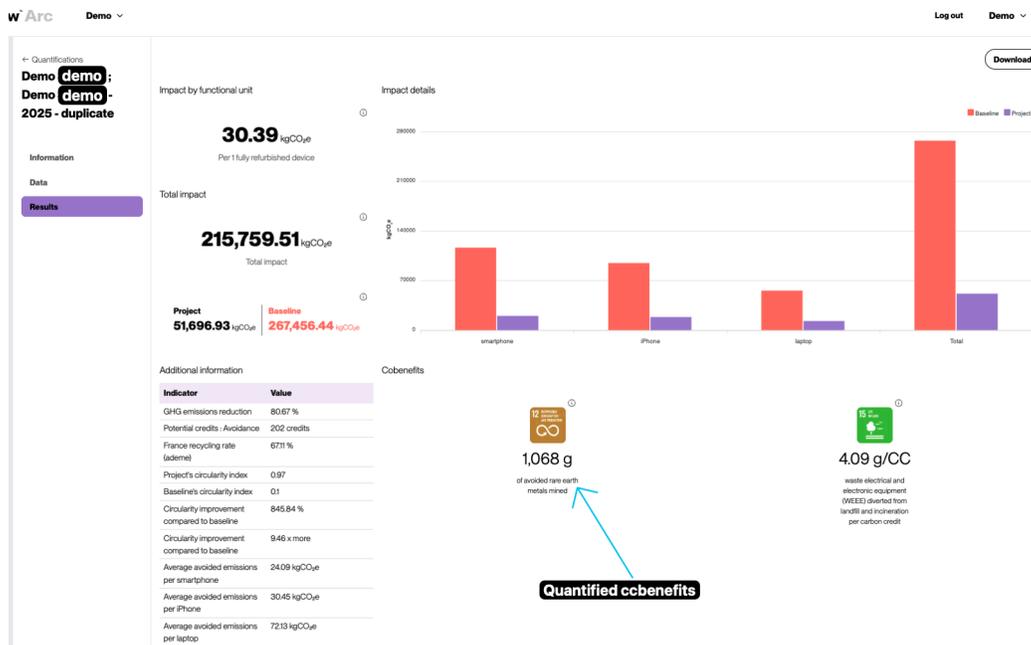
- Biochar application to soil, methodology, section Principles & requirements: <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-storage/biochar-application-to-soils#id-8f3i2uvmiuhl-1>

Table 1 Common co-benefits that projects under this methodology may provide are detailed, including types of proof that can be used to justify each co-benefit.

UN SDG	Example	Proof
SDG 2.4: Ensure sustainable food production systems, increase productivity, help maintain resilient ecosystems, improve land and soil quality.	Biochar application to agricultural soils can <i>increase crop yields</i> , therefore reducing the amount of land, pesticides, fertilizer, and other environmentally impactful resources needed to grow food	Proof of biochar use in agriculture as opposed to other applications: contract, invoices, receipts of sale of biochar to farmers.
SDG 12.2: Achieve the sustainable management and efficient use of natural resources	The project's <i>circularity</i> will be measured by the <i>Material Circularity Indicator (MCI)</i> , according to the Ellen MacArthur Foundation's methodology. The indicator is expected to be 100% circularity for all biochar projects, since they use biomass feedstock and do not landfill or incinerate their product.	Type of feedstocks used, verification of end use of biochar

- Refurbishing of electronic devices methodology, section Principles & requirements: <https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/principles-and-requirements#co-benefits>

The Rainbow Certification platform includes automatic calculation of cobenefits based on the provided data, using Life Cycle Assessment calculation. Screenshot of result page on the Rainbow Certification Platform:



It encourages projects to also consider and report on indicators specified by the host country, where applicable. The process for selecting and reporting these indicators is detailed in the Co-benefits section (as mentioned under Q15), ensuring transparency and relevance to local and global sustainable development priorities.

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

N/A

<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>	<p><input checked="" type="checkbox"/> YES</p>
--	--

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 Rainbow Standard Rules require **any project that claims co-benefits** to report quantifiable and verifiable sustainable development contributions or co-benefit indicators, as outlined in the Co-benefits section. This is detailed in the following requirements:

“If a Project Developer claims co-benefits, these must:

- *be in addition to climate benefits already accounted for in the issuance of RCCs,*
- *be positive environmental or social impacts that are substantial and additional, and*
- *if applicable, include any SGD indicators that are required by the host country.”*

“Claimed co-benefits shall be quantified and audited by a VVB using one of the following methods:

- *the project’s GHG quantification results, calculated using the Rainbow MRV platform and the corresponding methodology quantification model,*
- *primary data collection from the project (e.g. value displayed on an invoice),*
- *an LCA of the project or similar technology, or*
- *other reputable scientific documents, calculated by the Project Developer in a separate file and shared with the VVB and the Rainbow team.*

Project Developers shall provide information in the PDD on any standardized tools and methods that were used to assess the co-benefits.

Claimed co-benefits shall be monitored by the Project Developer. They shall be:

- *included in the project’s Monitoring Plan,*
- *updated with supporting evidence at each credit verification, and*
- *audited by a third-party VVB.”*

Requirements related to the cobenefits can be found in the Procedures Manual, section Principles and requirements, paragraph “Cobenefits”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#co-benefits>

Not all projects under the Rainbow Standard Rules are required to claim co-benefits, but if they choose to do so, they must follow the abovementioned reporting, monitoring and quantification procedures. However, projects issuing credits identified as CORSIA Eligible Emissions Units are **specifically required to claim and report cobenefits** according to the following requirement:

“Project Developers seeking eligibility for CORSIA Phase 1 shall comply with the following:

- *Projects shall have their first crediting period start on or post January 1, 2016*
- *RCCs are issued for vintages 2021 and beyond*
- *RCCs have been authorized by the host country, following the Host Country authorization procedure outlined below.*
- *Projects must be under a Rainbow methodology that has been approved by the CORSIA TAB for issuing CORSIA Eligible Emissions Units*
- ***Projects must report their sustainable development contributions or co-benefits, following the co-benefit reporting requirements outlined in the Rainbow Standard Rules”***

Requirements related to the cobenefits can be found in the Procedures Manual, section CORSIA and Article 6, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#corsia-eligibility-procedure>

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

N/A

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
--	---

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):

Rainbow publicly discloses detailed provisions for the **monitoring, reporting, and verification** of sustainable development contributions and co-benefits.

“All claimed co-benefits shall be monitored by the Project Developer. They shall be:

- *included in the project’s Monitoring Plan,*
- *updated with supporting evidence at each credit verification, and*
- *audited by a third-party VVB”*

This requirement can be found in the Rainbow Standard Rules, Principles and requirements, paragraph

“Cobenefits” and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#co-benefits>

“Monitoring Plans shall include parameters that are:

- material to GHG quantification,
- critical for determining project eligibility, including but not limited to environmental and social risks and leakage,
- critical to confirm the mitigation measures established in the Environmental and social risk assessment are in place,
- critical to confirm the measures established in the Reversal risk assessment are in place,
- **quantify the claimed co-benefits.**

These may include but are not limited to quantitative values, categorical data, qualitative criteria, descriptive parameters, or justification of procedures.”

This requirement can be found in the Rainbow Standard Rules, Principles and requirements, paragraph

“Monitoring” and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#monitoring>

Example of Monitoring template filled by a Project Developers:

Rainbow Monitoring Report - Earthrevive technologies



Claimed Cobenefits (SDGs)

The project's cobenefits, aligned with the Sustainable Development Goals (SDGs), are detailed below. These cobenefits were assessed and verified during the audit, in accordance with the Monitoring Plan included in the Project Design Document (PDD).

Table 3. SDGs related monitored parameters

SDG	Parameter	Value 2026	Sources
SDG 2	Increased yield per RCC	28.8 tonnes of additional wheat grown per removal carbon credit	Biochar co-benefits Earthrevive.xls
SDG 13	additional tCO2eq avoided per RCC due to the reduced N2O emissions due to biochar applied to crop fields	.4 to 23 additional tCO2e	Biochar co-benefits Earthrevive.xls
SDG12	Circularity index	100%	Gasifier at Wood Processing Facility - Audit - Quantification results 363fc11c-6d3b-46fd-b921-ecc4dd52e0a8.xls

The Monitoring template, which provides a specific table to track Claimed Cobenefits, can be found on Rainbow Documentation Hub, in Procedural templates, under the Monitoring report template, and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/annual-monitoring-template>

These provisions are also outlined in the Co-benefits section and include:

- **Monitoring:** Co-benefits must be included in the project’s Monitoring Plan and updated with supporting evidence at each credit verification.
- **Reporting:** All claimed co-benefits are documented in the Project Design Document (PDD) and on the project’s [Rainbow Registry](#) page.
- **Verification:** Co-benefits are audited by an independent Validation and Verification Body (VVB) using primary data, life cycle assessments, or other reputable scientific methods.

These requirements ensure transparency and accountability for all sustainable development claims.

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

N/A

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 checked="" 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) Rainbow ensures that all emissions units are based on accurate measurements and valid quantification methods following ISO 14064-2, as defined in its approved methodologies. Projects must use the Rainbow Certification Platform, and follow methodology-specific quantification models, which are rigorously reviewed and updated to reflect best practices and scientific standards.

“RCCs shall be calculated for each credit issuance by subtracting the GHG emissions and removals of the project scenario from the emissions and removals of a baseline scenario, representing the product or practices that would have occurred without the implementation of the project. Quantification of GHG emissions for the baseline and project scenarios shall follow ISO 14064-2:2019.

One RCC is issued per one tonne of CO2 equivalent avoided or removed by the project, compared to the baseline.

Project quantification of emissions and removals shall follow the instructions outlined in the relevant methodology. These quantifications shall adhere to the following principles:

- *Science-based: Use sound scientific methods, backed up by reputable sources.*
- *Complete: Use a life-cycle approach, and a wide enough scope to encompass all GHG sources, sinks and reservoirs that are materially affected by the mitigation activity.*
- *Transparent: Reproducible using the information provided in the project documentation and the methodologies. All necessary data and calculations shall be made publicly available to ensure transparency and allow for independent verification.*
- *Accurate: Based on project-specific data as much as possible where relevant. The number of RCCs*

issued shall be as close as possible to the actual number of GHGs avoided/removed.

- *Conservative: Ensure that RCC issuance is not likely overestimated, and when faced with uncertainty, choose approaches that systematically underestimate GHG avoidance/removals.”*

The requirements for GHG quantification can be found in the Standard Rules, under GHG quantification and are available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/ghg-quantification#general-principles-and-requirements>

Methodologies define specific scope and equations to be used for baseline and project quantification in the GHG quantification section. For example:

- Mineralization of alkaline materials:
<https://docs.rainbowstandard.io/methodologies/mineralization-of-alkaline-materials-ex-situ/ghg-quantification#project-feedstock-provisioning>
- Refurbishing of electronic devices:
<https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/ghg-reduction-quantification>

- b) Emission reductions and removals are measured, calculated using standardized quantification templates on Rainbow Certification Platform. The equations provided in the methodologies are implemented in the platform.

The emissions factors used are referenced in each methodology appendix. For example:

Appendix 1 : Ecoinvent processes

Table A1 List of ecoinvent 3.12 processes used in the GHG reduction quantification model

Device type	Ecoinvent activity
<i>Smartphone*</i>	consumer electronics production, mobile device, smartphone consumer electronics, mobile device, smartphone Cutoff, U, GLO
Tablet*	consumer electronics production, mobile device, tablet consumer electronics, mobile device, tablet Cutoff, U, GLO
PC**	computer production, desktop, without screen computer, desktop, without screen Cutoff, U, GLO
Laptop*	computer production, laptop computer, laptop Cutoff, U, GLO
Monitor	display production, liquid crystal, 17 inches display, liquid crystal, 17 inches Cutoff, U, GLO
Transport, truck	market for transport, freight, lorry 7.5-16 metric ton, EURO5 transport, freight, lorry 7.5-16 metric ton, EURO5 Cutoff, U, RER

Link <https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/appendix#jfq1kp34xi> to example:

i7

Rainbow provides Project Developers with a dedicated quantification module on its Rainbow Certification Platform.

Rainbow Arc Demo ▾ Log out Demo ▾

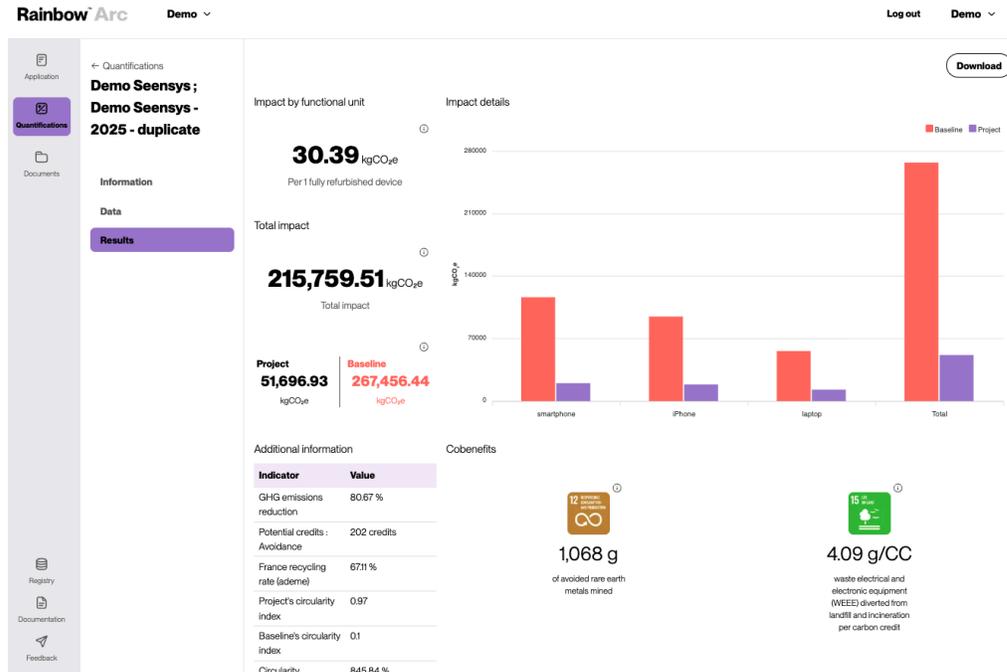
← Quantifications
Biochar Example - Machine 1; Biochar Project - Machine 1 - Year 1

Key Impact Indicators: Biomass carbon removal and storage (BCRS) for Biochar11 (V1.9.2)
 Documentation ⓘ

N.	Variable	Value	Description	Source
1	Discount factor	3	The Discount Factor is a set percentage of verified Rainbow Carbon Credits that are withheld and never issued to account for uncertainty in GHG reduction and potential overestimation.	Link documents
2 Batch metadata Please fill in information about your production batch. Link documents				
Batch ID ⓘ Batch starting date ⓘ Batch duration ⓘ Feedback description ⓘ Pyrolysis residence time ⓘ Pyrolysis target temperature ⓘ				
Data: <input type="text"/> <input type="text"/> (DD/MM/YYYY) <input type="text"/> (days) <input type="text"/> <input type="text"/> (minutes) <input type="text"/>				
3	Location	Select...	Where is your project located? For USA please refer to these maps: Regional entities and ISOs and RTDs	Link documents
4	Infrastructure and machinery approach	Select...	This covers the cradle to grave impacts from the Infrastructure and Machinery module v1.1 . In this section, please select one of the two modeling options outlined in the module.	Link documents
5 Infrastructure and machinery simplified approach If you have selected the Simplified approach option, then fill in the value below, otherwise put 0 here. Link documents				
Annual biomass processing capacity ⓘ Region ⓘ				
Description <input type="text"/> <input type="text"/>				
6 Infrastructure and machinery full approach If you have selected the Full Approach option, please add as many rows as needed to account for the modeling of significant infrastructure and machinery used. Link documents				
Item type ⓘ Material type ⓘ Material amount ⓘ				

Cancel [Save](#) [Calculate](#)

Results are computed and extracts are generated for the audit:



Example of an extract linked in a monitoring report:

- <https://arc.rainbowstandard.io/document/f143961f-5795-48fa-990f-20a14735b9df> , from Monitoring report of this project: <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-132>).
- https://drive.google.com/file/d/1fFEW9j_n9F8sPv7gLK0Tj7eJlnNX51tu/view from this project <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-104>

All project data, including quantification results and monitoring reports, are made publicly available on the Rainbow Registry and in the Project Design Document (PDD).

“Sufficient detail on the quantification of issued RCCs to allow independent replication of calculations at validation and for all subsequent verification events/credit issuances, including but not limited to quantification spreadsheet exports displaying:

- *calculation formulas*
- *default values/secondary data*
- *assumptions, and*
- *project input data/primary measurements.”*

The provision for disclosure of quantification information can be found in the Procedures Manual under Registry requirements, paragraph “Project documents publicly available on the registry” and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#project-documents-publicly-available-on-the-registry>

c) Rainbow requires a project to set monitoring and report monitoring requirements.

“Project Developers shall monitor and report ongoing key parameters about their activities, with proof, to demonstrate that:

- *the ex-post mitigation activity has occurred,*
- *the GHG quantification and credits issued are accurate and real,*
- *the project's ongoing compliance with the Rainbow Standard Rules and the relevant methodology.”*

The Monitoring Plan template can be found in the Rainbow Documentation Hub, in Procedural templates and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/annual-monitoring-template>

Rainbow requires regular monitoring, measuring, and reporting at intervals specified in each methodology and the project’s Monitoring Plan.

“Project Developers shall submit a Monitoring Report at least once per 24 months. Failure to do so shall result in the project being deregistered. The default monitoring period duration is one year, but may be shorter according to the requirements of the relevant Methodology, or at the Project Developer's request.

The Monitoring Report shall document for the monitoring period:

- *any project scope change;*
- *any process change;*
- *all of the parameters laid out in the Monitoring Plan;”*

This requirement Rainbow Procedures Manual, section Project certification, paragraph “Monitoring”, available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#monitoring>

This ensures continuous oversight and data integrity throughout the crediting period.

- d) All mitigation activities and resulting emission reductions or removals are measured and verified by accredited, independent Validation and Verification Bodies (VVBs).

GHG statements are audited as per the Validation procedures.

“All projects shall undergo a validation audit with an accredited third-party VVB to become eligible for issuing RCCs.

Once the Rainbow team completes the PDD review, and approves of the PDD, the Rainbow team puts together the Validation audit package, containing the elements listed below, available to the third-party VVB on the Certification Platform.

VVB shall follow the VVB requirements, to define the audit team, scope and plan.

The audit package shall contain the following elements :

- *PDD*
- *Risk assessment (Environmental and Social Risk Assessment, Reversal Risk Evaluation)*
- *Additionality template*
- *Monitoring Plan*
- ***GHG quantification spreadsheets (extracts from Rainbow Certification Platform)***
- *Stakeholder consultation procedure and outcome*
- *Site registration*
- *All relevant supporting documents and sources”*

This can be found in the Procedures manual, Project certification, paragraph “Validation audit” available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation-audit>

On an ongoing basis Project Developers shall submit Monitoring reports using Rainbow Certification Platform.

“Project Developers shall adhere to the Monitoring Plan, which is established and audited during the validation stage. The Monitoring Plan specifies the key parameters to track to:

- quantify GHG avoidance/removals and
- demonstrate compliance with the Principles and requirements in the Rainbow Standard Rules and the applicable methodology.”

This requirement can be found in the Procedures manual, Project certification, paragraph “Monitoring” available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#monitoring-and-verification>

For example:

- The credit issuance here: <https://registry.rainbowstandard.io/ledger/transactions/245fc84a-b187-41e6-87c1-4c0283fcdfb3>
- Is documented by the audit report available here: <https://arc.rainbowstandard.io/document/0affc728-60ef-4901-a889-c31490937793>
- Which provides links to extract:

Criteria	Indicator	Value 2025	Sources
C1 - Measurability	GHG quantification	<ul style="list-style-type: none"> • Construction: <ul style="list-style-type: none"> ○ Removals: 437RCCs ○ Avoidance: 9,228RCCs • Insulation: <ul style="list-style-type: none"> ○ 424RCCs 	GHG quantification extract from the Rainbow platform: <ul style="list-style-type: none"> • Construction • Insulation
	Updated EPD	Link to extracts	B-EPD PAL36EX.pdf
	Volume of IsoHemp blocks produced and sold for load-bearing walls and insulation (in m ²)	Construction: 20,069 m ² Insulation: 32,400 m ²	<ul style="list-style-type: none"> • Ventes 2025 IsoHemp.xlsx • Invoices Statistics (account.invoice.report) - 2025.xlsx
	Hemp acquisition invoices	2,026.5 tonnes	Achat Chanvre 2025.zip

TAB may use the “Columns” button on the registry to filter V7 and V7.1 projects:

1. Click to customise view

2. Select Standard version

MECHANISM	DEVELOPER	METHODOLOGY	COUNTRY	COBENEFITS	STATUS	AV.
Removal	Earthrevive	BICRS	India		Public comment period	0
Removal	Energias Industriales SA	BICRS	Switzerland		Listed	0
Removal	Revive Biochar	BICRS			Listed	0
Removal	Substrate Biochar Ltd	BICRS	South Africa		Registered	0

Customize view

- Project ID
- Name
- Mechanism
- Developer
- Methodology
- Country
- Cobenefits
- Status
- Available Credits
- Issued Credits
- Methodology version
- Standard version
- Location
- City
- Labels

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

Criterion: Validation and verification procedures

Q2. Does the Programme have in place requirements and procedures for... (<i>Paragraph 2.6</i>)	
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) Rainbow has established comprehensive requirements and procedures for the accreditation of both validators and verifiers, collectively referred to as Validation and Verification Bodies (VVBs).

On one end VVB requirements in Procedures Manual states:

“All Validation and Verification Bodies (VVBs) must undergo accreditation by Rainbow in order to audit projects for validation and verification under the Rainbow Standard Rules and Rainbow methodologies.”

On the other hand Validation procedures state: “All projects shall undergo a validation audit with an

accredited third-party VVB to become eligible for issuing RCCs.”

These include criteria for independence, technical competence, and compliance with Rainbow’s integrity policies. These requirements include notably:

“VVBs shall have a valid accreditation from either:

- *ISO 14065 or EN ISO 14065*
- *ISO 17029 or EN ISO/IEC 17029, with a scope of application related to GHG emissions*

VVBs must be accredited by an Accreditation Body that is part of the IAF MLA/MRA framework.

The VVB company shall prove that they employ auditors with more than 5 years of auditing experience, including at least 2 years in environmental/sustainability auditing (refer to Structure and qualification of VVB audit teams section).

VVBs shall adhere to the Rainbow Conflict of Interest Policy and confirm their independence from the market and carbon credit transactions. VVBs shall submit a declaration of conflict of interest form at each validation or verification audit they perform.

VVBs shall demonstrate that they employ auditors with knowledge of and experience on the sector it seeks accreditation for by providing CVs of the lead auditors, and proof that those auditors have worked on at least 2 projects within the sector within the 2 previous years.”

The accreditation process is detailed in the Procedures Manual, section VVB Requirements, paragraph “VVB accreditation” available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#vb-accreditation>

The Validation procedure is detailed in the Procedures Manual, section Validation, paragraph “Validation audit”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation-audit>

As provided in the accreditation process, accredited VVBs are publicly listed on Rainbow’s website, publicly accessible at this weblink: <https://rainbowstandard.io/standard>

- b) Same procedures apply to both validation and verification. For verification, VVBs have a maximum limit of 3 sequential years for every project.

“A single VVB shall conduct validation/verification audits for a specific project for a maximum of three sequential years. Upon reaching this limit, the Project Developer shall engage a different VVB for subsequent verifications. The Project Developer is granted a transition period of six months to engage a new VVB for the subsequent verification.”

The is detailed in the Procedures Manual, section VVB Requirements, paragraph “VVB rotation” available

at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#vb-rotation>

The verification requirements state that “*Projects shall undergo a verification audit with an accredited VVB for each RCC issuance.*” This can be found in the Procedures Manual, section Monitoring and verification, paragraph “Verification audit”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#verification-audit>

- c) Yes, VVB accreditation procedures are detailed in the Procedures Manual, section VVB Requirements, paragraph “VVB accreditation” available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#vb-accreditation>

The accredited VVBs are publicly listed on Rainbow’s website, publicly accessible at this weblink:

<https://rainbowstandard.io/standard>

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... (<i>Paragraph 2.6</i>)	
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) Rainbow has established standards and procedures for the validation of project activities, as outlined in the Project Certification Procedure. This includes:
 - the review of the audit package (including Project Design Documents (PDDs), Risk assessment (Environmental and Social Risk Assessment, Reversal Risk Evaluation), Additionality template, Monitoring Plan, GHG quantification, stakeholder consultations)
 - The site audit, ensuring “*the project exists and is functional, The scale of the project is in line with the description, Key processes operate as described in the project PDD*”
 - The public comment period
 - A validation review by Rainbow, ensuring all concerned are addressed

“All projects shall undergo a validation audit with an accredited third-party VVB to become eligible for issuing RCCs.

Once the Rainbow team completes the PDD review, and approves of the PDD, the Rainbow team puts together the Validation audit package, containing the elements listed below, available to the third-party VVB on the Certification Platform.

VVB shall follow the VVB requirements, to define the audit team, scope and plan.”

The audit procedure detailed in the VVB requirements of the Procedures Manual requires that :

“The Validation and Verification audits shall be conducted by VVB in accordance ISO 14064-3 and ISO 14065, and in compliance with the requirements of EN ISO/IEC 17021-1 in conjunction with EN ISO/IEC 19011 (or equivalent standards).

Validation and verification audits shall cover at least the following elements:

- *identification of the activity undertaken by the Project Developer which is relevant for the methodology*
- *identification of the relevant methodology and Rainbow Standard Rules requirements of the project and the Project Developer's organisation, and check its effective implementation;*
- *analysis of the risks which could lead to a material misstatement, based on the auditor's professional knowledge and the information submitted by the Project Developer. The analysis of risks shall take into consideration the overall risk profile of the activity, depending on the level of risk of the operator. The audit intensity or scope, or both, shall be adapted to the level of overall risk items.*
- *an audit plan which corresponds to the risk analysis and the scope and complexity of the Project Developer's activity, and which defines the sampling methods to be used with respect to that operator's activity;*
- *implementation of the audit plan by gathering evidence in accordance with the defined sampling methods, plus all relevant additional evidence, upon which the auditor's conclusion will be based;*
- *a request by the auditor to the Project Developer to provide any missing elements of audit trails, an explanation of variations, or the revision of claims or quantification, before reaching a final audit conclusion;*
- *Internal Review by an auditor who is not the Audit Leader, in the same VVB organization, to perform a final QA/QC review (Quality Assurance/Quality Control), attesting to accuracy of data and of the Audit Leader's findings.”*

The Validation procedure is detailed in the Procedures Manual, section Validation, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation>

The Validation and Verification process can be found in Procedures Manual, VVB Requirements, paragraph “Validation and Verification process” available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#v>

Validation-and-verification-process

- b) Rainbow provided Monitoring and verification procedures. The audit procedures for VVB is the same as the one provided in a) where *“the audit package shall contain the following elements :*
- *Monitoring Plan,*
 - *Monitoring Report,*
 - *GHG quantification spreadsheets (extracts from Rainbow Certification Platform),*
 - *Any relevant supporting documents and sources”*

At the end of the audit and prior to the issuance of RCC *“the Rainbow Certification Team directly reviews the following content:*

- *the VVB’s remarks and the Project Developer’s responses*
- *the verification Audit Report*
- *the Monitoring Report”*

The verification procedure is detailed in the Procedures Manual, section Monitoring and verification, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#monitoring-and-verification>

- c) All validation and verification standards, procedures, and requirements are publicly disclosed:
- i) The Validation and Verification process can be found in Procedures Manual, VVB Requirements, paragraph *“Validation and Verification process”* available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/vvb-requirements#validation-and-verification-process>
 - ii) The Validation procedure is detailed in the Procedures Manual, section Validation, available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation>
 - iii) The verification procedure is detailed in the Procedures Manual, section Monitoring and verification, available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#monitoring-and-verification>

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) Rainbow requires that validation of project activities must be completed before, or in tandem, any verification of emissions reductions or removals can occur.

“Validation is always the first audit for a project. Validation only occurs once at the beginning of each crediting period.

A project may undergo:

- *validation only, if they are in the early stages of operation, have activities that can be assessed in the site audit, but may not want to issue credits yet. In this case, no RCCs are issued as an outcome of the audit, or*
- *validation and verification simultaneously, if it is operational and ready to issue ex-post RCCs.”*

This sequential process is clearly defined in the Procedures Manual, section Validation, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation>

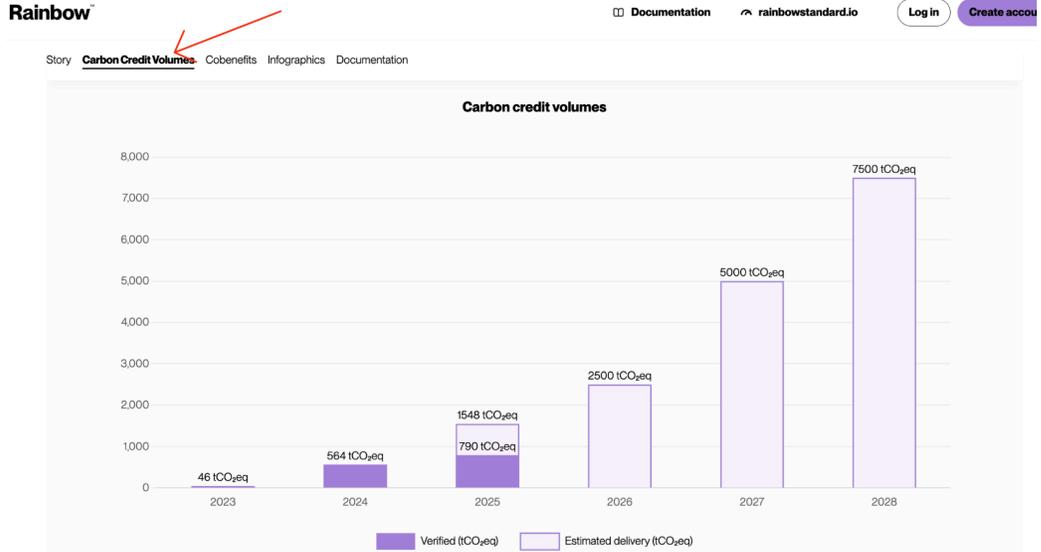
- b) Yes, *“upon project validation, Project Developers shall provide an estimate of total GHG avoidance and/or removals for the entire crediting period.”* This requirement can be found in the Standard Rules, section GHG quantification, paragraph “General principles and requirements” and is available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/ghg-quantification>

During validation audit, VVBs assess and document the expected mitigation results, including quantification of emission reductions or removals, in the Project Design Document (PDD).

The validation audit package shall include the GHG quantification as listed in the Validation audit package in Validation audit in Procedures Manual, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation-audit-package>

This information is made publicly available on the Rainbow Registry directly on the project page, in the section “Carbon Credit Volumes”.

Screenshot example:



Link to example: <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-104>

And also detailed in the PDD:

Project Design Document - Biokol

3.4. Results

Year 2023

Table 7. - Emission removals for biochar produced in 2023 per site

Modules	Hällekis site	Hjo site
	Impact (tCO ₂ e)	Impact (tCO ₂ e)
Biomass feedstock	0	0
Infrastructure and machinery	1.0	1.8
Processing and energy use	0.2	0.3
Transportation	0.2	0.2
Biochar soil amendment	-9.2	-43
Total Carbon Removal per year	-7.7	-40.7
Total Carbon Removal Credits for the period, including discount factor (3%)	7	39
Amount of biochar produced and spread in the period (tonnes)	4.01	14.2
Removed emissions per FU	-1.74	-2.74

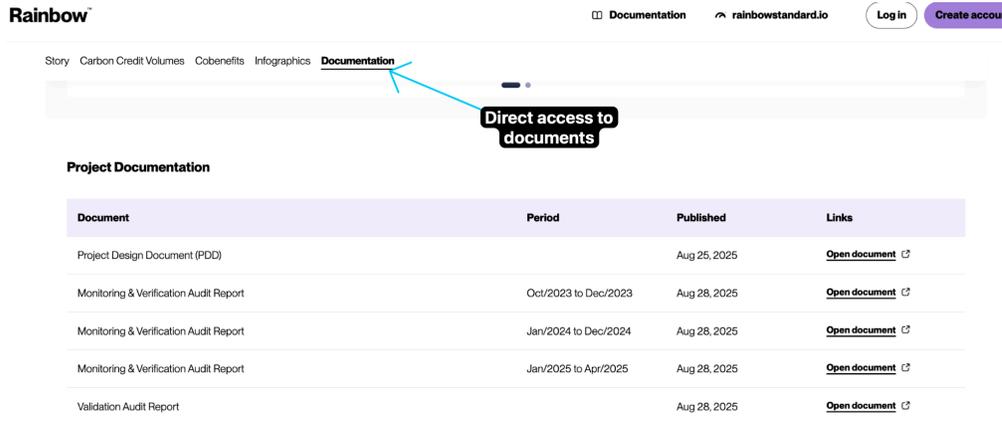
Year 2024

Table 8. - Emission removals for biochar produced in 2024 per site

Modules	Hällekis site	Hjo site
	Impact (tCO ₂ e)	Impact (tCO ₂ e)
Biomass feedstock	0	0
Infrastructure and machinery	4.2	7.4
Processing and energy use	1.1	0.4
Transportation	6.6	2.8
Biochar soil amendment	-463.8	-141.8
Total Carbon Removal per year	-456	-131.2
Total Carbon Removal Credits for the period, including discount factor (3%)	437	127
Amount of biochar produced annually (tonnes)	163.94	48.64
Removed emissions per FU	-2.66	-2.61

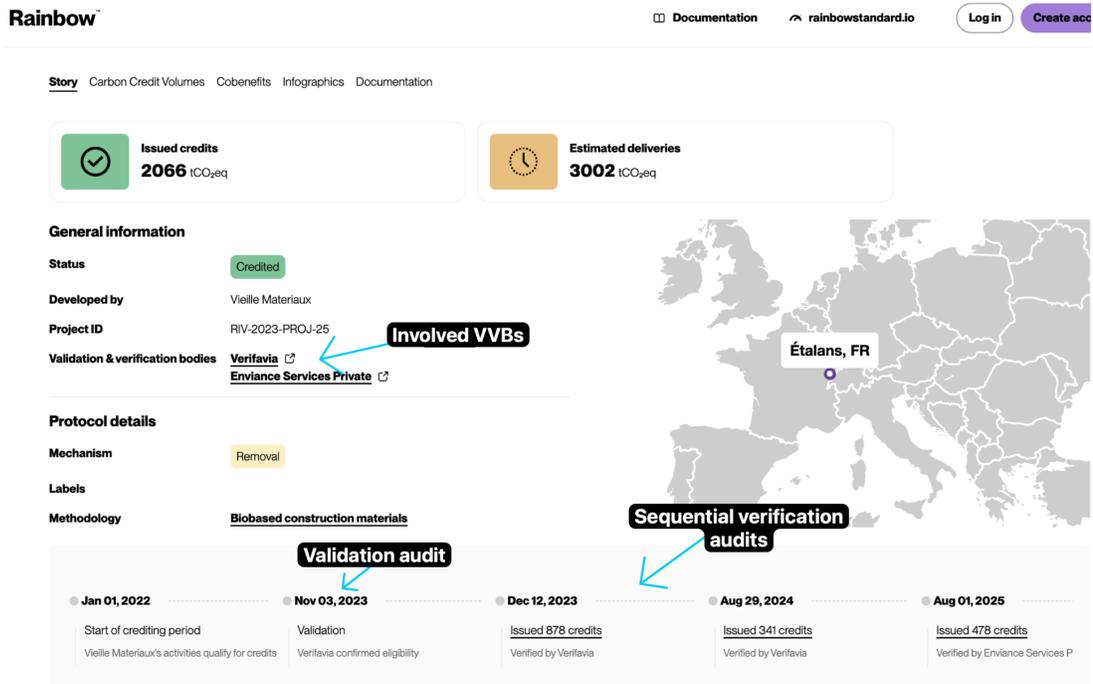
PDD example available at this link:
<https://arc.rainbowstandard.io/document/af9a2b4f-c62a-46cb-b42f-a02398c5968b>

- c) The results of both validation and verification, including all reports and certificates, are published on the project’s page in the Rainbow Registry, ensuring full transparency.



Link to example: <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-104>

- i) Rainbow publishes the PDD at validation, which includes the Monitoring Report. For example, a PDD available at this link: <https://arc.rainbowstandard.io/document/af9a2b4f-c62a-46cb-b42f-a02398c5968b>
- ii) The project page header summaries the audits and the accredited VVBs involved in validation and verification audits.



- iii) VVBs submit to Rainbow the Validation/Verification Audit reports. Those are published in the

registry.

- 1) Validation report:
<https://arc.rainbowstandard.io/document/7da43986-a428-4137-9543-987821ae0881>
- 2) Verification report:
<https://arc.rainbowstandard.io/document/9e4f9a10-950f-40fd-86e1-bfa70ccde077>

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) Rainbow requires **ex-post verification** of mitigation activities before any Rainbow Carbon Credits (RCCs) are issued. This is a mandatory step in the certification process, as detailed in Procedures Manual, in the Project Certification section, available at:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#monitoring-and-verification>

Furthermore, the RCC issuance procedures state that, *“The issuance of RCCs is operated by the Rainbow Certification team once the project's monitoring & verification is conducted, and all Audit Reports are available.*

A member of the Rainbow Certification team initiates the issuance, and their name is registered and tracked in the Registry. The issuance details are reviewed by a second Rainbow Certification team member who verifies the accuracy, completeness, and compliance of the issuance with Rainbow’s procedures. The second team member must explicitly approve the issuance in the system. Only upon approval are the RCCs officially issued in the registry.”

This procedure is available in the Procedures Manual, in Rainbow Carbon Credit section, paragraph “Issuance”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#issuance>

- b) For the avoidance of doubt, Rainbow **does not issue credits ex ante**; all RCCs are issued only after ex-post verification of actual mitigation results. Therefore, there is no need to identify ex ante units as

ineligible for CORSIA.

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... (Paragraph 2.3)	
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) Rainbow has clear procedures for the issuance of Rainbow Carbon Credits (RCCs), which are detailed in the Rainbow Carbon Credits section. Ex-post issuance occurs only after successful verification by an accredited VVB and approval by the Rainbow Certification Team.

“The issuance of RCCs is operated by the Rainbow Certification team once the project’s monitoring & verification is conducted, and all Audit Reports are available.

A member of the Rainbow Certification team initiates the issuance, and their name is registered and tracked in the Registry. The issuance details are reviewed by a second Rainbow Certification team member who verifies the accuracy, completeness, and compliance of the issuance with Rainbow’s procedures. The second team member must explicitly approve the issuance in the system. Only upon approval are the RCCs officially issued in the registry.

Upon issuance of removal RCCs, a portion of credits are automatically and immediately transferred from Project accounts to the shared Rainbow Buffer Pool account. The number of RCCs, when calculated as a percentage of the buffer pool contribution, is always rounded up to the nearest whole credit.

All issuance events shall be recorded on the Rainbow registry with at least the following details:

- *Verified by: Accredited VVB that conducted the audit*
- *Monitoring period: period covered by the issuance*
- *Audit Report: audit report produced by the VVB*

The initial owner of all RCCs shall be the Project Developer.”

The issuance procedure can be found in Rainbow Procedures Manual, section Rainbow Carbon Credits, paragraph “Issuance”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#issuance>

- b) Definition for retirement and cancellation are outlined in the Rainbow Carbon Credits section and copied below.

Status	Definition
Available	RCCs issued ex-post at the end of the reporting period, following submission of a Monitoring Report and <u>verification audit</u> by a third-party VVB. Available to be transferred and retired.
Retired	Once retired, an RCC and its climate benefit are locked, with its designated purpose for the beneficiary. They are no longer transferable, ensuring exclusivity and preventing any further use or transfer.
Canceled	RCCs that were Available but were found to be invalid (e.g., issued in error, or reversed in the case of removal RCCs. See the <u>Cancellation</u> procedure).
Buffer	Verified removal RCCs issued to the Project Developer account and immediately and automatically transferred to the Rainbow Buffer Pool to cover potential reversal events.

These definitions are available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#rcc-status>

Rainbow treats cancellations and retirements as different procedures. Whereby:

- i) A retirement *“marks the final ownership and event for an RCC. By retiring an RCC, the associated climate benefit is locked into a specific accounting purpose, preventing any future use whether by the original owner, the designated beneficiary, or any other party. This guarantees the unit’s exclusivity in its intended claim.*

The beneficiary of a retirement is the organization on behalf of whom the RCC was retired, and must be publicly identified on the Rainbow registry. Beneficiaries can be the current holder, or an organization that is specified by the owner of the unit during the Retirement procedure.

Users may request retirements of the RCC owned by their organization, by following the process on the Rainbow registry.”

Screenshots example of retirement process enforced on Rainbow Registry.

Retire credits ×

STEP 1 / 3 Select which and how many credits you want to retire

Project	Mechanism	Durability	Vintage	Labels	Owned	To be retired
Chemin du Roi Transforming agricultural waste into biogas and Org...	Removal	1000 years	2024	CORSIA ICVCM	1234	<input type="text" value="100"/>
Chemin du Roi Transforming agricultural waste into biogas and Org...	Avoidance		2024	CORSIA	1234	<input type="text" value="100"/>
Electronic devices recycling and reconditioning center	Removal	500 years	2024	CORSIA	1234	<input type="text"/>
Electronic devices recycling and reconditioning center	Removal	500 years	2023	CORSIA	1234	<input type="text"/>

Retire credits ×

STEP 2 / 3 Review the credits you have selected to be retired

Project	Selected credits	To be retired
Chemin du Roi Transforming agricultural waste into biogas and Org...	Removal 1000 years 2023	100 <input type="text"/>
Chemin du Roi Transforming agricultural waste into biogas and Org...	Avoidance 2024	500 <input type="text"/>

Total credits to be retired: 600

Retire credits ×

STEP 3 / 3 Specify a retirement reason and who is retiring the credits

Retiring credits on behalf of another company

Company name

Company country

Reason

Additional notes Optional

The retirement procedure can be found in Rainbow Procedures Manual, section Rainbow Carbon Credits, paragraph “Retirements”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#retirements>

Retirements are recorded immutably on the Rainbow Registry, with public access to all transaction records at this weblink: <https://registry.rainbowstandard.io/ledger/retired-credits>

ii) A cancellation is the event where RCCs are no longer available for use or retirement following a reversal or erroneous over-issuance. *“RCCs shall be canceled in the event of a reversal or erroneous over-issuance. The cancellation of RCCs is operated by the Rainbow team once a Cancellation Notice is submitted and is validated by the Rainbow Secretariat.”*

“After investigation and compensation by the Rainbow team, a Cancellation Report is generated, stating the party responsible for the compensation”.

The cancellation procedure can be found in Rainbow Procedures Manual, section Rainbow Carbon Credits, paragraph “Cancellation”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#cancellation>

And recorded on the Registry here: <https://registry.rainbowstandard.io/ledger/canceled-credits>

For the avoidance of doubt no credits have been cancelled.

- c) Rainbow applies an **uncertainty discount**, based on the results of an **uncertainty assessment** as described in the GHG Quantification section.

This discount is calculated according to methodology-specific requirements and is designed to ensure conservative and robust quantification of mitigation outcomes. The discount factor reflects both methodology-level uncertainty and project-level uncertainty by combining a methodology- and project-level uncertainty assessment. These requirements are outlined **at the standard-level**:

*“Methodologies shall **establish a minimum discount factor** for all projects certified under them. This factor shall reflect all unmanaged sources of uncertainty, their impact on quantification, and any conservative measures already applied to mitigate uncertainty. Complemented by a project-specific uncertainty assessment, a higher factor may be applied for any given project.*

Discount factors shall be determined by qualitatively scoring the uncertainty of each source as none, low, medium, high or very high, after accounting for conservative approaches. The IPCC framework for outcome probability should be used for assessing the uncertainty of each element, as presented in the “Assigning uncertainty level” column of the table below.”

This requirement can be found in the Standard Rules, under GHG quantification, in the paragraph “Uncertainty assessment” available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/ghg-quantification#uncertainty-assessment>

Furthermore, the Procedures Manual provides that *“A fraction of a project’s quantified RCCs may be eliminated using the uncertainty discount factor to mitigate carbon credit overestimation. These verified avoided/removed emissions are never issued as RCCs and will not appear on the registry...”*

A discount factor shall be applied when material uncertainty is identified in the project's GHG quantification. This may be related to, for example, the project’s measured data, assumptions, or the selection of the baseline scenario.

When material uncertainty is detected:

- *Steps shall be taken to reduce uncertainty wherever possible.*
- *Conservative choices must be adopted.*

- *If uncertainty remains, a discount factor is applied.”*

The Discount factor procedure can be found in Rainbow Procedures Manual, section Rainbow Carbon Credits, paragraph “Discount factor”, available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#discount-factor>

Below is an example of an **uncertainty assessment at the methodology level**, for the Refurbishing of electronic devices methodology:

“An uncertainty assessment is presented below for all aspects of GHG quantification set at the methodology level. The findings from this assessment are then applied at the project level, where project-specific GHG quantification also undergoes an uncertainty assessment.

The overall project GHG quantification uncertainty is determined by qualitatively combining both the methodology-level and project-specific uncertainties for each identified source of uncertainty.

The assumptions that are estimated to have high uncertainty (i.e. high variability and high impact) are:

- *The amount of devices avoided in the baseline scenario is proportional to the ratio of new and refurbished device lifetimes.*
- *The ratio of new and refurbished device GHG emissions from ADEME can be extrapolated to represent the refurbishing process of all similar devices.*
- *The residual economic value of used devices represents the GHG emissions that should be allocated from production Device A first life to the refurbished Device B.*

The assumptions that are estimated to have moderate uncertainty are:

- *Similar devices have similar characteristics (mass, emission factor, lifetime), leading to grouping devices into device type categories rather than assessing specific device models and brands.*
- *The distribution of Device B in the baseline and project scenarios is assumed to be the same.*

The assumptions that are estimated to have low uncertainty (i.e. low variability and low impact) are:

- *Non-functioning parts are assumed to be recycled.*
- *The distance for e-waste collection of Device A in the baseline scenario is assumed to be 100 km.*
- *Packaging, use, and waste treatment of Device B are assumed to be the same in the baseline and project scenarios.*
- *Monitors with no size breakdown are assumed to be <25". This assumption is conservative, as smaller monitors are associated with lower impacts from new device production, resulting in reduced avoided emissions.*

The baseline scenario selection has low uncertainty and is mostly standardized. It accounts for project-specific information regarding the number, type and fate of devices, and national e-waste

management statistics.

The equations used in this methodology consist of basic conversions and have low uncertainty.

Many estimates and secondary data are used in this methodology to enable a reasonable amount of project data collection. These data have varying levels of uncertainty, and are assessed in Table 6.

The uncertainty at the methodology level is estimated to be moderate. This translates to an expected discount factor of at least 10% for projects under this methodology.”

The full text can be found in the Refurbishing of electronic devices methodology, section GHG quantification, sub-section Uncertainty assessment: <https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/ghg-reduction-quantification#uncertainty-assessment>

Below is an **an excerpt from an uncertainty assessment at the project level**, for project Biokol - Sweden - New biochar production site, Project ID [RIV-2025-PROJ-104](#), using the Biomass carbon removal and storage (BiCRS) methodology and its associated modules (Biomass feedstock, Processing and energy use, Biochar application to soil, Transport, and Infrastructure and machinery):

“According to the Rainbow Biomass carbon removal and storage V1.0 methodology, the model at the methodology-level has a low level of uncertainty. At the project-module-level, the uncertainty for the following components is assessed.

Biomass feedstock

- ***Assumptions:***
 - *No project-level assumptions were made for this quantification. These were assessed at the methodology level.*
- ***Measurements:***
 - *No project-level measurements were made for this quantification.*
- ***Estimates or secondary data used for the project assessment:***
 - *For estimating the amount of feedstock sourced for each batch, an approximate ratio was used. This ratio was determined on initial observations made by the project developer while they monitored the amount of biochar produced for the amount of feedstock fed to the pyrolyzers. This ratio was then applied to back-calculate the feedstock used for all the biochar amounts produced.*
 - *However, the impacts from feedstock have been excluded as they are sourced sustainably as per the FSC and PEFC certifications, and have negligible impact on project emissions. Therefore, even though these estimates have a moderate level of uncertainty, due to their exclusion from the system boundary and use of the full approach for infrastructure, this assumption carries no uncertainty on the overall quantification of results.*

Processing and energy use

- ***Assumptions:***
 - *No project-level assumptions were made for this quantification. These were assessed at*

the methodology level.

- **Measurements:**
 - *No project-level measurements were made for this quantification.*
- **Estimates or secondary data used for the project assessment:**
 - *The external 3rd party LCA of Hjelmsäter’s biochar production estimates that 25.8 kWh of electricity is consumed for every m3 of biochar produced. This was roughly converted to around 125 kWh per tonne of biochar, which is estimated to be applicable to both project sites. These estimates have a moderate level of uncertainty, however, the impact from the ‘Processing and energy use’ module constitutes far less than 1% of the net removals done by the project. Therefore, these estimates carry a low level of uncertainty on the overall results.*
 - *For this project, it is estimated that a maximum of 0.001 kg/h of methane is emitted, as mentioned in BIOMACON pyrolyser specifications (page 11). Conservatively considering that the plant operates the entire year (8,750 hours), this translates to a total 8.75 kg of methane per year. Accordingly, methane emissions from each batch and for each issuance year have been calculated based on the number of days the batch was operating in the particular year. These estimates carry a low level of uncertainty and have minimal impact on the overall results.*

...

Based on the above assessments of the project and the model, the overall level of uncertainty for this project is estimated to be low. This corresponds to a 3% discount factor.”

The full project uncertainty assessment can be found in the PDD at this link under the uncertainty assessment section: <https://arc.rainbowstandard.io/document/af9a2b4f-c62a-46cb-b42f-a02398c5968b>

d) Yes and the above answers to each question links to the relevant publicly disclosed sections.

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
---	---

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):

Rainbow utilizes the **Rainbow Registry**, an electronic registry that ensures the transparent, secure, and traceable issuance, transfer, and retirement of all Rainbow Carbon Credits (RCCs). The registry is publicly accessible and provides real-time data on all transactions and credit statuses.

Link to the registry: <https://registry.rainbowstandard.io>

Rainbow™

Documentation

rainbowstandard.io

Log in

Create account

Rainbow carbon credit registry

The Rainbow Registry is a public ledger for carbon credits issued under the Rainbow Standard. It ensures full transparency on certified projects and credits, tracks carbon credits throughout their lifecycle—from issuance to retirement—and connects projects with resellers to facilitate transactions

Total verified climate impact

399,760 tCO₂eq

As of March 3, 2026

Projects Retired credits Issued credits Canceled credits

PROJECT ID	NAME	MECHANISM	DEVELOPER	METHODOLOGY	COUNTRY	COBENEFITS	STATUS
RIV-2025-PROJ-104	Biokl - Sweden - New biochar production site	Removal	BC Trading AB	BICRS	Sweden		Cred
RIV-2025-PROJ-116	Cânhamor - Portugal - New hemp concrete blocks facility	Removal	Cânhamor Lda.	Biobased Mat	Portugal		Cred
RIV-2025-PROJ-106	Carbon centric - France - Expansion of biochar production unit - Aquitaine	Removal	Carbon centric	BICRS	France		Cred

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? (Paragraph 2.4.3)	<input checked="" type="checkbox"/> YES
b) ...clearly identify unit owners or holders? (Paragraph 2.4 (d))	<input checked="" type="checkbox"/> YES
c) ...identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement? (Paragraphs 2.4 (a) and (d) and 2.4.4)	<input checked="" type="checkbox"/> YES
d) ...identify unit status, including retirement / cancellation, and issuance status? (Paragraph 2.4.4)	<input checked="" type="checkbox"/> YES
e) ...assign unique serial numbers to issued units? (Paragraphs 2.4 (b) and 2.4.5)	<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? (Paragraph 2.4.5)	<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) The Rainbow Procedures Manual details the attributes of a Rainbow Carbon Credit (RCC) and requires

labelling of project and credits. The ICAO-eligible unit shall be labeled following the CORSIA eligibility criteria, that can be found in the Procedures Manual under CORSIA eligibility procedure, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#corsia-eligibility-procedure>

This information is visible in all account types and transaction records, ensuring full transparency and compliance with CORSIA requirements.

“Each RCC credit block is uniquely described on the registry by:

- *Credit serial numbers*
- *Number of credits in the block*
- *Project registry ID*
- *Vintage year (year of verified activity in verification)*
- *Type of mechanism (avoidance or removal)*
- *Methodology ID and version number*
- *Rainbow Standard Rules version number*
- *Host country (inherited from Project)*
- *Durability (in years, for removal RCCs only)*
- *Credit status*
- ***Labels where relevant (e.g. CORSIA-eligible, Article 6, CCP...)”***

The list of attributes defining a RCC can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Credit Attributes”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#credit-attributes>

- b) The Procedures Manual requires the Rainbow Registry clearly identifies the owners or holders of all RCCs, with account details and transaction histories publicly accessible as required.

“The Rainbow Registry identifies and tracks the following:

- *RCC status according to the definitions outlined below*
- *RCC ownership/holding, from issuance to cancellation/retirement.”*

The issuance procedures state that “The initial owner of all RCCs shall be the Project Developer.”

The requirement for ownership can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “RCC Status”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#rcc-status>

- c) The registry tracks and facilitates the transfer of unit ownership from issuance through to cancellation or retirement, providing a full audit trail for each credit. As stated in the Procedures Manual, Rainbow Carbon Credits section:

“Transfer of RCCs are subject to the following rules

- *Users can only transfer RCCs that they own; and*
- *Users can only transfer RCCs to Buyers who have an active registry account.*

All transfer events shall be recorded on the Rainbow registry with the former owner of the units and the recipient.

The Rainbow registry shall ensure that transactions are secure, with a double validation system, requiring both sender and recipient to acknowledge and validate the transfer.

Rainbow does not allow any transfer of RCCs outside of the Rainbow registry.”

The requirement for transfer and ownership can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Transfer”, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#transfers>

Example from the Registry (feel free to choose a more relevant one):

Rainbow Documentation rainbowstandard.io Log in Create account

20 credits transferred to PATCH TECHNOLOGIES, INC. Transfer

● Oct 27, 2025 **Verification**
251 credits issued to Manufacture Bois Paille

● Feb 27, 2026 **Transfer**
20 credits transferred

General information		Transaction details		Credits details	
From	Manufacture Bois Paille	Amount	20 tCO ₂ e _q	Mechanism	Removal
To	PATCH TECHNOLOGIES, INC.	Completed at	27/02/2026	Credit IDs	RIV-FR-14-RMV-2024-637e6/99:118
		Transaction ID	c9627ded-dd4d-4c7d-atb4-1faa63d8fafd	Vintage year	2024

Project information	
Status	Credited
Developed by	Manufacture Bois Paille
Project ID	RIV-2023-PROJ-14
Methodology	Biobased construction materials

Villefranche-sur-Saone, FR

- d) The status of each RCC (including issuance, transfer, and retirement, and if required cancellation) is recorded and publicly visible on the Rainbow Registry. The definitions followed are in the RCC Status of the Rainbow Procedures Manual.

“The Rainbow Registry identifies and tracks the following:

- *RCC status according to the definitions outlined below*
- *RCC ownership/holding, from issuance to cancellation or retirement.*

Rainbow Carbon Credits (RCCs) shall have an assigned status on the Rainbow Registry, including one of the following:”

Status	Definition
Available	RCCs issued ex-post at the end of the reporting period, following submission of a Monitoring Report and <u>verification audit</u> by a third-party VVB. Available to be transferred and retired.
Retired	Once retired, an RCC and its climate benefit are locked, with its designated purpose for the beneficiary. They are no longer transferable, ensuring exclusivity and preventing any further use or transfer.
Canceled	RCCs that were Available but were found to be invalid (e.g., issued in error, or reversed in the case of removal RCCs. See the <u>Cancellation</u> procedure).
Buffer	Verified removal RCCs issued to the Project Developer account and immediately and automatically transferred to the Rainbow Buffer Pool to cover potential reversal events.

”

The requirement for status tracking can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “RCC Status”, available at:

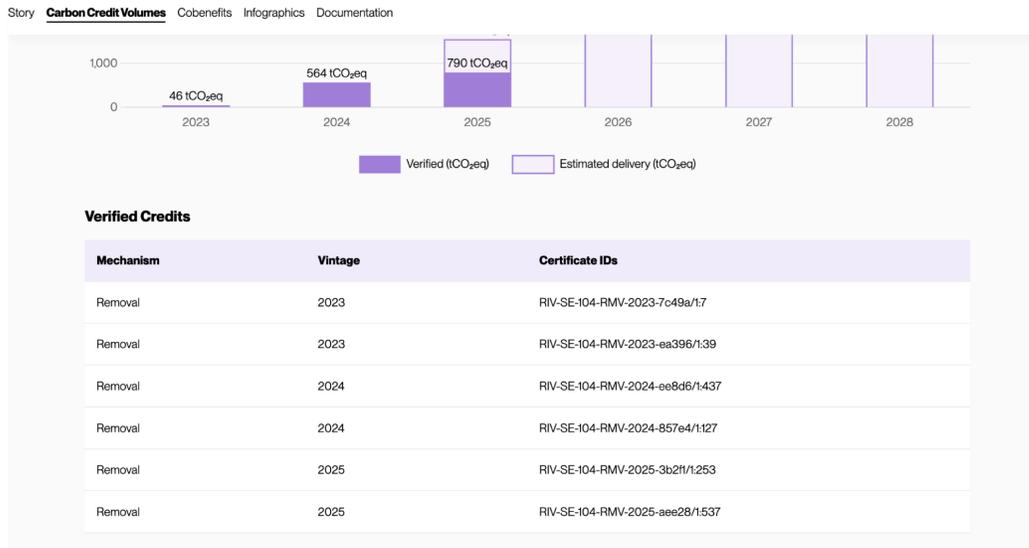
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#rcc-status>

- e) Every RCC is assigned a unique serial number upon issuance, ensuring traceability and preventing double counting. As stated in the Credit Serial Number of the Procedures Manual, *“Each RCC has its own unique serial number on the Rainbow Registry. Credit IDs are generated using a consistent naming convention”*

The requirement for serial numbers can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Credit serial numbers”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#credit-serial-numbers>

Credits serial numbers of issued credits can be found on each project page under “Carbon Credits volume” section:



And on any transaction (eg retirement, issuance, transfer, cancellation) page:

Rainbow Documentation rainbowstandard.io Log in Create account

24 credits retired by PATCH TECHNOLOGIES, INC. on behalf of Patch's customers and/or their end users. Retirement

Timeline:

- Sep 16, 2024: Verification (4263 credits issued to Sens Technologies)
- Feb 26, 2026: Transfer (24 credits transferred)
- Feb 26, 2026: Retirement (24 credits retired by PATCH TECHNOLOGIES, INC.)

Transaction details:

- Amount: 24 tCO₂eq
- Completed at: 26/02/2026
- Transaction ID: c9035a53-096f-4a02-a8a6-94f360657d9d

Credits details:

- Mechanism: Avoidance
- Credit IDs: RIV-FR-5-AVD-2023-8d7b3/381:404
- Vintage year: 2023

General information:

- Retired by: PATCH TECHNOLOGIES, INC.
- On behalf of: Patch's customers and/or their end users.
- Reason: On behalf of Patch's customers and/or their end users.
- Certificate: Download

f) The serialization includes detailed information for each unit, such as country, project ID, vintage year, and mechanism (which may be a proxy for sector), all of which are publicly accessible. As stated in the rules:

- “Registry identifier: RIV or RBW
- Country code (e.g. FR, DE)
- Project ID (internal registry identifier)
- Mechanism abbreviated as:
 - AVD for avoidance
 - RMV for removal
- Vintage year (e.g. 2023)
- Last 5 characters of the issuance transaction UUID
- Credit number within the issuance transaction (e.g. 1 or 248)”

The requirement for serial numbers can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Credit serial numbers”, available at:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#credit-serial-numbers>

And an example:

i For example, a credit block may have the following serial number:

RIV-FR-P123-AVD-2025-3f9a1-1:100

This ID indicates a credit block from project **P123** in France, with avoidance credits from 2025, issued under a transaction ending in **3f9a1**, and covering credits numbered from 1 to 100. This credit block contains the following credit, representing credit number 3 within the credit block:

RIV-FR-P123-AVD-2025-3f9a1-3

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

N/A

Q9. Are provisions in place for registry account screening, including...	
a) ...provisions ensuring the screening of requests for registry accounts? (<i>Paragraph 2.4.7</i>)	<input checked="" type="checkbox"/> YES
b) ...provisions restricting the programme registry (or registries) accounts to registered businesses and individuals? (<i>Paragraph 2.4.7</i>)	<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) Rainbow requires Account holders to go through Know Your Customer (KYC) and Anti-Money Laundering (AML) assessment as well as signing up to the General Terms, enabling screening all requests for registry accounts, as outlined in the Registry requirements section.

“Account holders shall accept the Terms of Use and go through KYC and AML assessment.

To open an account, the organization must submit all required documentation and identification information to Rainbow, including:

- *Account holder type*
- *Legal entity name*
- *Organization registration number*
- *Organization phone number*
- *Registration address (postal code, city, address)*
- *Country*
- *Industry/Sector*
- *Website*
- *VAT number (if relevant)*

The requirement for Account Holders can be found in the Procedures Manual, section Registry requirements, paragraph "Account creation", available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#account-creation>

Under the section Governance & Integrity of the Rainbow Documentation Hub can be found:

- The Know Your Customer (KYC) policy, available:
<https://docs.rainbowstandard.io/other/governance-and-integrity/kyc-policy>
- The Anti-Money Laundering (AML) policy, available at this weblink:
<https://docs.rainbowstandard.io/other/governance-and-integrity/anti-money-laundering-aml-policy>

Furthermore Rainbow team shall adhere and follow the Anti-Bribery and Corruption Policy, that can be found in the Governance & Integrity of the Rainbow Documentation Hub, and is available at:

<https://docs.rainbowstandard.io/other/governance-and-integrity/anti-bribery-and-corruption-policy>

- b) Access to the Rainbow Registry is restricted to registered businesses and individuals who have completed the required due diligence and onboarding process, as specified in the Terms & Conditions for Registry Users . As stated in the Account creation procedure: "*Account holders shall accept the **Terms of Use** and go through KYC and AML assessment.*"

The Terms & Conditions for Buyers can be found in the Rainbow Documentation Hub, under User Terms & Guidelines, and are available at:

<https://docs.rainbowstandard.io/other/terms-and-contracts/terms-and-conditions-for-registry-users>

The Terms & Conditions for Project Developer can be found in the Rainbow Documentation Hub, under User Terms & Guidelines, and are available at:

<https://docs.rainbowstandard.io/other/terms-and-contracts/terms-and-conditions-for-project-developers-mrv+-registry>

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

Rainbow is updating the General Terms for its user which will simplify the process into one document for both Project Developer and Buyers

The Terms are currently in consultation period, which is 45 days in length, will officially close on March 30, 2026, subsequent to the notification of customers.

During the consultation period, the terms and conditions can be found at:

<https://docs.rainbowstandard.io/~/changes/231/other/terms-and-contracts/terms-and-conditions-for-project-developers-mrv+-registry>

After March 30th, they will be accessible in the Rainbow Documentation Hub in User terms and guidelines:

<https://docs.rainbowstandard.io/other/terms-and-contracts/terms-and-conditions-for-project-developers-mrv+-registry>

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>	<input checked="" type="checkbox"/> YES
b) ...ensuring the periodic audit or evaluation of registry compliance with these security provisions? <i>(Paragraph 2.4.8)</i>	<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) Rainbow implements robust security provisions for the Rainbow Registry, including data encryption, multi-factor authentication, and regular security assessments. These measures are designed to protect against unauthorized access, fraud, and data breaches, as detailed in the Registry IT security procedures by implementing:
 - Adherence to security standards for data transfers, authentication and database encryption
 - Regular security checks
 - Incident procedures

The procedures for security of the registry can be found in the Procedures Manual, section Registry requirements, paragraph “Registry IT security”, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#registry-it-security>

- b) The Rainbow Registry undergoes periodic audits and evaluations to ensure ongoing compliance with security standards.

“The following elements shall be verified:

- *Verify compliance with the above requirements*
- *Verify security vulnerability status and upgrade all JavaScript dependencies with npm.*
- *Review Authentication provider access*
- *Review Cloud provider IAM accounts and access*

- Rotate database passwords, API keys (internal and external)
- Review Database connection allowlist
- Review repository history for leaked secrets
- Verify application authorization rules”

These audits are conducted by the Product & Tech Team and are documented by the Secretariat in the Administrative Oversight Record.

The procedures for security of the registry can be found in the Procedures Manual, section Registry requirements, paragraph “Registry IT security”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#registry-it-security>

The reports can be found Administrative Oversight Record on Rainbow Documentation Hub, in the section “Miscellaneous”, available at:

<https://docs.rainbowstandard.io/other/administrative-oversight#miscellaneous>

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

Rainbow has contracted with a certification provider to conduct a SOC2 assessment and certification by the end of Q3. The engagement letter may be accessed at this weblink:

<https://drive.google.com/file/d/1VySrKbmMzpz4s9CmPOEAEkzDND0KEQH/view?usp=sharing>

The scope of this assessment covers Rainbow Registry and Rainbow Certification. This includes the implementation of recurring automated tests to improve the security standards.

Rainbow will update TAB on the progress on this assessment.

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):

The **Rainbow Registry** does not support transfer of units to/from any other registries, but supports direct linkages through APIs to enable robust, automated integrations with third parties, including other registries, project developers, and buyers, eliminating the need for manual data entry and reducing the risk of errors. Example of such linkage:

- **Public API:** The Rainbow Registry offers a public API, enabling secure and standardized data exchange with external platforms.
- **CADTrust:** The Rainbow Registry has been connected to **Climate Action Data Trust meta registry** for over a year, demonstrating its capability to link with meta-registries and ensuring interoperability with other carbon credit tracking systems. (<https://data.climateactiondata.org/>)

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

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):

The Rainbow Registry exposes multiple external-facing Application Programming Interfaces (APIs) that conform to the OpenAPI Specification (OAS) v3.0 standard. By adhering to the OAS v3.0 standard, Rainbow ensures clear, consistent, and well-documented API endpoints. This facilitates seamless integration for external partners, supports the generation of client libraries and API documentation, and promotes interoperability across different systems and programming languages.

The API documentation may be shared upon request by Account Holders that have accepted the Terms of Use.

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

Q13. Does the programme Registry publicly display information... (<i>Paragraph 2.3.1</i>)	
a) ...on each batch of cancelled units?	<input checked="" type="checkbox"/> YES
b) ...in a machine-readable format (<i>e.g., XLS, CSV</i>) that is searchable and downloadable?	<input checked="" type="checkbox"/> YES
c) ...at no cost?	<input checked="" type="checkbox"/> YES
d) ...with no login credentials required?	<input checked="" type="checkbox"/> 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) The **Rainbow Registry** publicly displays detailed information on each batch of retired Rainbow Carbon Credits (RCCs), including the date, quantity, and associated project or account. The batch ID is included in the serial number of the credit ID.

Example:

The screenshot shows the Rainbow Registry interface. At the top, there is a navigation bar with 'Rainbow' logo, 'Documentation', 'rainbowstandard.io', 'Log in', and 'Create account' buttons. The main heading is '1000 credits retired by Schneider Electric France on behalf of Groupe Canal+'. Below this is a timeline showing four stages: 'Aug 21, 2023' (Verification: 4183 credits issued to Alt Eco Production), 'Oct 20, 2025' (Transfer: 660 credits transferred), 'Feb 09, 2026' (Transfer: 1000 credits transferred), and 'Feb 10, 2026' (Retirement: 1000 credits retired by Schneider Electric France). Below the timeline are three panels: 'General information' (Retired by: Schneider Electric France, On behalf of: Groupe Canal+, Reason: Contribution positive au titre de nos émissions de l'année 2025, Certificate: Download), 'Transaction details' (Amount: 1000 tCO₂e, Completed at: 10/02/2026, Transaction ID: 146e2398-d27a-435d-908f-3d16a603721d), and 'Credits details' (Mechanism: Avoidance, Credit IDs: RIV-FR-16-AVD-2022-152f6/6971356, RIV-FR-16-AVD-2022-152f6/13821721, Vintage year: 2022). A callout box labeled 'Serial numbers' points to the Credit IDs.

Link to example:

<https://registry.rainbowstandard.io/ledger/transactions/146e2398-d27a-435d-908f-3d16a603721d>

For the avoidance of doubt, Credit IDs are displayed on any transaction type, including cancellation. Although there are no cancellations to date, the ID will be displayed similarly to this retirement.

b) All retirement data is available in machine-readable formats (such as CSV) and can be easily searched and downloaded directly from the Rainbow Registry, available at: <https://registry.rainbowstandard.io/ledger/retired-credits>

c) By clicking the download button  at no cost.

Rainbow carbon credit registry

The Rainbow Registry is a public ledger for carbon credits issued under the Rainbow Standard. It ensures full transparency on certified projects and credits, tracks carbon credits throughout their lifecycle—from issuance to retirement—and connects projects with resellers to facilitate transactions

Total verified climate impact

399,760 tCO₂eq

As of March 3, 2026

Download button

Projects **Retired credits** Issued credits Canceled credits

Q Search  **Columns**

DATE ↓	AMOUNT (tCO ₂ e)	RETIRED BY	BENEFICIARY	VINTAGE	MECHANISM	COUNTRY	METHODOLOGY
27 Feb 26	20	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2024	Removal	France 🇫🇷	Biobased Mat
27 Feb 26	18	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France 🇫🇷	Biobased Mat
27 Feb 26	26	Rainbow	Rainbow.	2023	Avoidance	France 🇫🇷	General Std Rules
26 Feb 26	24	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France 🇫🇷	E-Refurb
26 Feb 26	10	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2022	Avoidance	France 🇫🇷	E-Refurb

Users may adapt the content of the downloaded file using the “Columns” button and selecting the relevant fields.

d) Without any log in required.

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

N/A

<p>Q14. Does the machine-readable information on cancelled units contain discrete fields for each of the following, in respect of each batch of units (<i>please select</i>)? (<i>Paragraph 2.3.1</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Quantity of emission units cancelled <input type="checkbox"/> Start of serial numbers <input type="checkbox"/> End of serial numbers <input type="checkbox"/> Date of cancellation <input type="checkbox"/> Name of Programme (<i>if the Registry holds units from multiple Programmes</i>) <input type="checkbox"/> Unit type <input type="checkbox"/> Host country <input type="checkbox"/> Methodology¹⁴ <input type="checkbox"/> Start date of the activity’s first crediting period <input type="checkbox"/> Vintage year of the unit or batch of units <input type="checkbox"/> CORSIA compliance period(s) for which each batch of units is eligible 	<input checked="" type="checkbox"/> YES
--	---

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

<p>Q14. Does the machine-readable information on cancelled units contain discrete fields for each of the following, in respect of each batch of units (<i>please select</i>)? (<i>Paragraph 2.3.1</i>)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Quantity of emission units cancelled <input type="checkbox"/> Start of serial numbers <input type="checkbox"/> End of serial numbers <input type="checkbox"/> Date of cancellation <input type="checkbox"/> Name of Programme (<i>if the Registry holds units from multiple Programmes</i>) <input type="checkbox"/> Unit type <input type="checkbox"/> Host country <input type="checkbox"/> Unique identifier of the registry account where the batch was cancelled <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>) 	<input checked="" type="checkbox"/> YES
--	---

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):

Using the “Columns” button user may select necessary fields:

Projects **Retired credits** Issued credits Canceled credits

Columns

DATE ↓	AMOUNT (TCO _{2e} ...	RETIRED BY	BENEFICIARY	VINTAGE	MECHANISM	COUN
27 Feb 26	20	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2024	Removal	Frar
27 Feb 26	18	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	Frar
27 Feb 26	26	Rainbow	Rainbow.	2023	Avoidance	Frar
26 Feb 26	24	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	Frar
26 Feb 26	10	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2022	Avoidance	Frar
26 Feb 26	24	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	Frar

Customize view

- Date
- Amount (tCO_{2e})
- Retired by
- Beneficiary
- Vintage
- Mechanism
- Country
- Methodology
- Project ID
- Name
- Developer

Currently the extract contains:

- Quantity of emission units cancelled
- Date of retirement
- Unit type (e.g. mechanism)
- Host country
- Methodology
- Vintage year of the unit or batch of units

- Last owner of the unit (Identifier of the registry account unit where retired from)
- Beneficiary in whose name the unit was cancelled

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

Rainbow Product & Tech team is currently working on an update of this download feature to allow for the selection of the following additional columns to the retirement list:

- Durability
- Serial numbers
- Label/Accreditations (eg CORSIA eligible period)

This will be live by the end of April 2026.

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):

Rainbow’s qualification and quantification methodologies that are **finalized, approved, and available for immediate use** are publicly disclosed include:

- Biomass carbon removal and storage (BiCRS)
- Mineralization of alkaline materials (ex situ)
- Enhanced rock weathering
- Biogas from anaerobic digestion
- Refurbishing of electronic devices
- Biobased construction materials
- Battery second life

Each methodology document includes detailed procedures for project eligibility, baseline setting, monitoring, quantification, and verification.

For further transparency, each methodology is version-controlled and accompanied by a Version History logging

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*”.

all changes, ensuring users always have access to the most current and applicable standards

They are accessible in the **Methodologies** section under the Rainbow Standard Documentation section.

This document is publicly available at

<https://docs.rainbowstandard.io/rainbow-standard-documents/methodologies>

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

A public consultation will close on March 11th 2026 on two new methodologies:

- Distributed open-kiln biochar
- Distributed closed-kiln biochar

The final versions of these methodologies will be released in April 2026.

Rainbow is also working on:

- A revision and restructuring of the Biomass carbon removal and storage (BiCRS) methodology. Currently it is a “modular methodology”, with requirements at both the methodology level (BiCRS document, here <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs>) and the module level (e.g. Biochar application to soils module, here <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-storage/biochar-application-to-soils>). The revision will remove the modular structure, and result in complete methodologies, for example instead of the Biochar application to soils module which is used in conjunction with the Biomass feedstock module, we expect to have a complete Biochar methodology that takes requirements from the current BiCRS methodology, Biochar application to soils module, and Biomass feedstock module. This updated version of the biochar methodology will be published for public consultation in May 2026, and finalised in Q3 2026.
- The creation of a BioCCS methodology, to be published for public consultation in April 2026, and finalised in Q2 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):

Rainbow’s process for developing and revising methodologies and protocols is **transparent, science-based, and stakeholder-inclusive**, ensuring alignment with best practices and continuous improvement. Procedures are outlined for the creation and revision of methodologies, including submission of new methodology creation proposals to the Standard Advisory Board (SAB), collaborating with a technical working group, public consultation, finalization and approval.

1. Development of New Methodologies

The creation of a new methodology must be **approved by the Standard Advisory Board**:

“Any interested party may submit a request for a new methodology at any time. The requests are summarized by the Secretariat into a Methodology Creation Proposal (template [here](#)).

The Methodology Creation Proposal is reviewed first by the Rainbow Science Team, and if approved then it is reviewed by the SAB for final approval.

The reviews consider factors such as:

- *Maturity of the technology*
- *Number of existing projects*
- *Scientific consensus of substantial carbon avoidance/removal potential*
- *Feasibility of MRV*
- *Feasibility of meeting other Principles and requirements from the Rainbow Standard Rules*

If the proposal is validated by the SAB, a Methodology Creation Mandate is granted to the Secretariat and the Rainbow Science Team. This mandate assigns the designated teams to research, develop, and finalize the methodology. The current Methodology Creation Mandates are presented below.”

Then, the science team **collaborates with a technical working group** to make decisions and **draft the methodology document**:

“The Secretariat gathers a technical working group composed of at least 3 individuals, including members of the Expert Community and at least one independent external expert (i.e. an individual with relevant technical expertise who is not affiliated with Rainbow, its funders, or eligible projects, and who has declared no conflict of interest). The technical working group collaborates with the Rainbow Science Team to develop the methodology...”

To research and develop the methodology, the Rainbow Science team gathers and consults the technical working group on a regular basis. Final decisions rest with the Rainbow Science team.”

Then, a **public consultation** is launched for the methodology draft, after which the science team assesses and incorporates feedback, gets final approval from the Standard Advisory Board, and **finally publishes the new methodology**:

“Once the initial methodology draft is complete, the Secretariat launches a public consultation for a minimum of 30 days, following the Public consultation procedures outlined below.

The Secretariat and the Rainbow Science team then assess all feedback, deciding and justifying whether to incorporate each feedback into the final methodology draft. This draft is validated by the SAB, which verifies that input from the Expert Community, other experts, and the public consultation has been fully integrated.”

2. Revision of Existing Methodologies

Procedures for methodology revision are separated into major and minor revisions. Major revisions to methodologies follow the same procedure as major revisions to the Rainbow Standard documents, including collaboration with a technical working group and public consultation. Minor revisions are published regularly by the Rainbow Science Team, without full public consultation.

“Major updates involve substantive changes and undergo a rigorous vetting process, following the Rainbow Standard Documentation Major revision procedure and the technical working group requirements described in the Creating a new methodology section, including a public consultation. These updates are indicated by changes to the first number after the methodology name (e.g. BiCRS methodology V1 → V2). Major updates include:

- *Changes to eligible project types, technologies, or geographies*
- *Revisions to Principles & requirements that could disqualify previously validated projects (compliance procedures apply as outlined in the Versioning and project compliance section)*
- *Adjustments to quantification methodologies, such as scope reviews or database updates, that result in at least a 20% average change in avoided or removed emissions*
- *Any changes deemed as major by the SAB*

Minor updates and clarifications are published regularly and remain open for continuous public feedback on the Rainbow website. These updates are tracked by changes to the second number after the methodology name (e.g. BiCRS methodology V1.1 → V1.2).”

3. Timing

Regarding the timing of methodology revisions, the Procedures Manual states:

“All methodologies shall be reviewed and undergo public consultation at least every three years...

A methodology may be discontinued if:

- *shifts in scientific consensus indicate it no longer aligns with best practices*
- *it fails to achieve measurable carbon avoidance/removal*
- *it is no longer additional*
- *it consistently overestimates credits and cannot be revised to ensure conservativeness*
- *projects under that methodology consistently fail to meet the Principles and requirements outlined in the Rainbow Standard Rules*
- *Methodologies are evaluated against these criteria **at least once every three years** during the mandatory major revision process, though they can also be reviewed and discontinued at any time if necessary.”*

The full contents of these procedures can be found in the Procedures Manual, section Standard and Methodologies, sub-sections Creating a new methodology and Revising a methodology, available at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/standard-and-methodologie>

5

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

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):

Rainbow currently allows **project-level activities only**. Aggregation of smaller activities into a "Programme of Activities" or jurisdiction-scale interventions is not permitted under the current rules. The project scope is strictly defined as **individual, clearly bounded projects** with specific technologies, locations, and monitoring plans.

*"Compliance with a methodology is determined **on a per-project basis**. Every project seeking certification under the Rainbow Standard shall be evaluated individually and independently audited against the Standard's Principles and requirements, and those of the relevant methodology. All projects must be certified with a Rainbow Methodology."*

The full contents of these procedures can be found in the Standard Rules, section Overview of Rainbow, sub-section Standard Scope, accessible at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/organization-of-rainbow#standard-scope>

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

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):

All eligible activities shall comply with the Rainbow Standard Rules, where requirements are detailed in section Principles and requirements, accessible at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements>

Rainbow defines detailed instruction and eligibility criteria for each type of activity within its **methodologies**. Each methodology specifies:

- **Applicability conditions** (technology, sector, and activity requirements)

- **Eligible sectors** (e.g., carbon removal, energy efficiency, waste management)
- **Project types** (e.g., biomass carbon removal, enhanced rock weathering, battery second life)
- **Geographic scope** (global unless other specified, with project-specific location requirements)

The Procedures Manual requires methodologies to define these eligibility criteria:

“The minimum requirements for a Rainbow methodology include the following:

Scope/general

- *Eligible technologies and activities, description of the practices and processes covered*
- *Scope/delineation of a project (e.g. number of sites can be included in one project)*
- *Geographic locations covered, if not global”*

These can be found in each methodology in the Eligibility and Scope section (formerly referred to as “Eligible technologies” under Standard Rules v6.2, for methodologies not yet updated to V7), below is an example extract from the Refurbishing of electronic devices methodology:

“Projects eligible under this methodology are the activities that carry out the technical aspects of refurbishment. Refurbishment is defined according to the EU Regulation 2024/1781 as “actions carried out to prepare, clean, test, service and, where necessary, repair a product or a discarded product in order to restore its performance or functionality within the intended use and range of performance originally conceived at the design stage at the time of the placing of the product on the market”. Activities that only collect used devices (e.g. buyback schemes) or serve as marketplaces for refurbishers are not eligible projects.

Marketplaces may act as intermediaries between Rainbow and refurbishers to assist in the certification process. Signed agreements shall be provided ensuring that the refurbishers are the principal and final beneficiaries of carbon finance.

Devices eligible under this methodology include: small consumer electronics such as smartphones, laptops, tablets, desktop computers, gaming consoles, and monitors. Other device types may be included in future versions of this methodology... Both full and light refurbishing activities are eligible for Rainbow Carbon Credits (RCCs) under this methodology.”

This example extract can be found here:

<https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/eligible-technologies#eligible-technologies>

The full contents of these procedures can be found in the Procedures Manual, section Standards and Methodologies, sub-section Creating a new methodology, sub-section Development, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/standard-and-methodologies#minimum-requirements-for-a-methodology>

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

N/A

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) Rainbow defines the length of crediting periods within each **approved methodology**. The crediting period duration is typically **5 years**, with some methodologies allowing longer periods depending on project type and risk profile. This is specified in the **Eligibility and Scope/Certification requirements** section of each methodology. The Procedures Manual requires methodologies to define these eligibility criteria:

“The minimum requirements for a Rainbow methodology include the following:

Scope/general

- ...
- *Maximum duration of the crediting period”*

Methodologies define the crediting period in the section Eligibility and scope, sub-section Certification requirements. Below is an example extract from the Refurbishing of electronic devices methodology:

“Crediting period duration: the maximum duration of the crediting period for projects certified under this methodology is 5 years.”

The specific methodology requirements can be found in Eligibility and scope, sub-section Certification requirements, for example at this link for the Refurbishing of electronic devices methodology: <https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/eligible-technologies#certification-requirements>

Below is an example extract from the BiCRS methodology (which will be revised and restructured soon, see response to part B):

“Crediting period duration: the maximum duration of the crediting period for projects certified under this methodology is 5 years.”

The specific methodology requirements can be found in Biomass carbon removal and storage (BiCRS) methodology, Eligibility and scope, sub-section Certification requirements, at this link: <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs#certification-requirements>

The standard-level requirement to define this in methodologies can be found in the Procedures Manual, section Standards and Methodologies, sub-section Creating a new methodology, sub-section Development.

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/standard-and-methodologies#minimum-requirements-for-a-methodology>

- b) Crediting periods may be renewed, subject to re-validation and verification of continued additionality and compliance with the methodology. Renewal procedures state that:

“Upon renewal of the crediting period, projects must comply with the most recent version of the applicable methodology and the Rainbow Standard Rules, and undergo a new validation assessment by performing the following steps, including all elements described in the Project validation section:

- *Preparation of a new PDD, with updated responses to all principles and requirements, updated GHG quantification, and an updated selection of a baseline scenario*
- *Validation audit*
- *Site audit*
- *Stakeholder consultation*
- *Project validation review*

Upon renewing a crediting period, a new crediting period start and end date shall be defined for the project.”

The full contents of these procedures can be found in the Procedures Manual, section Project Certification, sub-section Crediting period renewal, at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#crediting-period-renewal>

- c) All procedures regarding crediting periods and renewals are linked above to show where the rules are publicly disclosed and for completeness listed below:

- i) Rainbow Methodologies (individual methodology documents, for example here: <https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/eligible-technologies#eligible-technologies>)
- ii) Procedures Manual, Project Certification Procedure: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#crediting-period-renewal>
- iii) Procedures Manual, Minimum requirements for a methodology: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/standard-and-methodologies#minimum-requirements-for-a-methodology>

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

The requirement that all methodologies define crediting period durations was recently created, with the update to Rainbow Standard Rules V7.0. All methodologies must be subsequently revised and updated to comply with

this requirement. These methodology updates and addition of crediting period duration requirements are in-progress. Here is the status and timelines of the methodology updates:

- **Complete, no further changes:** Refurbishing of electronic devices
- **Complete but expecting changes by end of May 2026:** Biomass carbon removal and storage (BiCRS), which has already been updated to align with the Standard Rules V7 requirements, and at the methodology level will undergo a revision and restructuring. Currently it is a “modular methodology”, with requirements at both the methodology level (BiCRS document, here <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs>) and the module level (e.g. Biochar application to soils module, here <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-storage/biochar-application-to-soils>). The revision will remove the modular structure, and result a single methodology, for example instead of the Biochar application to soils module which is used in conjunction with the Biomass feedstock module, we expect to have a new Biochar methodology that takes requirements from the current BiCRS methodology, Biochar application to soils module, and Biomass feedstock module.
- **Methodologies not yet updated to align with V7.0, expecting changes by end of May 2026:**
 - Mineralization of alkaline materials (ex situ)
 - Enhanced rock weathering
 - Biogas from anaerobic digestion
 - Biobased construction materials
 - Battery second life

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

<p>Q6. Does the Programme have procedures in place to ensure, and to support activities to analyze and demonstrate, legal or regulatory additionality¹⁶?</p>	<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):

Rainbow requires all projects to demonstrate legal and regulatory additionality as part of the validation process. The Standard Rules state:

“Mitigation activities must go beyond what is required by regulations. Project Developers shall prove the following:

¹⁶ Legal or regulatory additionality means that the programme’s carbon offsets represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate

- *There is no enforced law, regulation, statute, legal ruling or other regulatory framework that makes the implementation of the project or specific mitigation activity mandatory.*
- *If there is an enforced regulation related to the project, the project results in greater GHG emission avoidance/removals than what is required by regulations. In this case, only the project activities that surpass the mandated amount are eligible for RCCs.*
- *If regulations promote or subsidize technologies, set targets for increased adoption of a technology, or otherwise support the technology, the resulting lower baseline scenario emissions shall be explicitly considered and accounted for in the establishment of the baseline scenario.*

Project Developers shall describe the current and upcoming regulatory environment related to their mitigation activity in the Rainbow Additionality Template.

Upcoming regulations include those that are confirmed and set to go into effect within 5 years.”

Project Developers are assisted in preparing this using the Rainbow Additionality Evaluation Template. This can be found in the Procedural templates, section Additionality evaluation template, at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/additionality-evaluation-template>

The full contents of these procedures can be found in the Rainbow Standard Rules, section Principles and requirements, sub-section Additionality, sub-section Regulatory surplus analysis, at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#regulatory-surplus-analysis>

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):

Rainbow requires all projects to demonstrate additionality by passing **Regulatory Surplus Analysis**, and either

Investment Analysis or Barrier Analysis:

- a) Regulatory Surplus Analysis
 - Projects must prove they exceed all applicable legal/regulatory requirements.
 - If regulations exist, only the portion of mitigation surpassing mandated levels is eligible for Rainbow Carbon Credits (RCCs).
 - Projects describe the current and upcoming regulatory environment in the additionality template.
- b) Investment Analysis
 - Projects must show that carbon finance is **necessary for financial viability**.
 - Required: Investment analysis/business plan with and without carbon revenue, including IRR calculations and all funding sources.
 - Only additional mitigation enabled by carbon finance is eligible.
- c) Barrier Analysis
 - Projects must identify and quantify **financial, institutional, or technological barriers** preventing the activity from proceeding or expanding.
 - Carbon revenue must be decisive in overcoming these barriers.
 - Projects must demonstrate that at least one alternative activity does not face significant barriers.

This is stated in the following extract from the Rainbow Standard Rules:

“All projects shall prove their additionality by meeting the requirements of at least two additionality tests: regulatory surplus analysis, plus either investment or barrier analysis.

Project Developers shall fill in the Rainbow Additionality Template to demonstrate their additionality, using project-specific justifications and verifiable evidence. Methodologies may provide further instructions or requirements for demonstrating additionality.

Note that RCCs are only issued for GHG reductions and/or removals that are additional to the baseline environmental conditions. This is sometimes referred to as environmental or carbon additionality. This is addressed in the baseline scope requirements.

Regulatory surplus analysis

Mitigation activities must go beyond what is required by regulations. Project Developers shall prove the following:

- *There is no enforced law, regulation, statute, legal ruling or other regulatory framework that makes the implementation of the project or specific mitigation activity mandatory.*
- *If there is an enforced regulation related to the project, the project results in greater GHG emission avoidance/removals than what is required by regulations. In this case, only the project activities that surpass the mandated amount are eligible for RCCs.*
- *If regulations promote or subsidize technologies, set targets for increased adoption of a technology, or otherwise support the technology, the resulting lower baseline scenario emissions shall be explicitly*

considered and accounted for in the establishment of the baseline scenario.

Project Developers shall describe the current and upcoming regulatory environment related to their mitigation activity in the Rainbow Additionality Template.

Upcoming regulations include those that are confirmed and set to go into effect within 5 years.

Investment analysis

Project Developers using investment analysis shall prove that revenue from carbon finance is necessary to make the project investment financially viable.

Project Developers shall prove that revenue from carbon finance is necessary for investments to launch or expand the project. Note that for investments in expansion, only the additional avoided or removed carbon enabled by the expansion shall be eligible for Rainbow Carbon Credits.

Project Developers shall provide an investment analysis and/or business plan, with accompanying spreadsheet and calculations, showing that funding from carbon finance is necessary for the project investment. They shall include all funding sources in the investment analysis and/or business plan. The analysis should be based on the project's Internal Rate of Return (IRR) with and without carbon finance.

Barrier analysis

Project Developers using barrier analysis shall prove that barriers prevent the mitigation activity from continuing or expanding, and that revenue from carbon finance is necessary to allow projects to overcome these barriers. These may be financial, institutional, or technological barriers.

Examples of barriers include but are not limited to:

- *Financial: high upfront costs, uncertain or low returns on investment, long payback periods*
- *Institutional: complex or costly regulatory requirements, limited access to financing, lack of supportive infrastructure, limited market demand, resistance from incumbents*
- *Technological: cost competitiveness and economic viability, scale and manufacturing challenges*

Project Developers shall identify, describe and quantify the barrier, with verifiable proof.

Project Developers shall demonstrate that revenue from carbon finance is decisive in overcoming this barrier, including justification that:

- *the magnitude of revenue from carbon finance is similar to the amount of funding needed to overcome the barrier, and*
- *the project could not have provided the funding itself, providing financial results and considering all project funding sources.*

Project Developers shall demonstrate that at least one alternative to the project activity does not face significant

barriers, including the barriers faced by the project.

Note that for overcoming barriers to expansion, only the additional avoided or removed carbon enabled by the expansion shall be eligible for Rainbow Carbon Credits.”

Project Developers are assisted in these additionality analyses using the Rainbow Additionality Evaluation Template. This can be found in the Procedural templates, section Additionality Evaluation template, at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/additionality-evaluation-template>

The full contents of these procedures can be found in the Rainbow Standard Rules, section Principles and requirements, sub-section Additionality, at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#additionality>

Procedures and Documentation

- **Project Developers** submit the Additionality Evaluation as part of the Project Design Document (PDD).
- **Validation and Verification Bodies (VVBs)** independently review the assessment for compliance.
- **Public Disclosure:** All additionality assessments and validation reports are published for each project on the [Rainbow Registry](#). These state:

“The following information must be publicly accessible in linked project documents available on the registry:

- *Demonstration of project compliance with the Rainbow Standard Rules and the applicable methodology. This includes, at a minimum:*
 - *Additionality template*
 - *...*
 - *The Audit Reports of every project validation and verification audit”*
- are required to be made publicly available on the registry according to the Procedures Manual, section Registry requirements, sub-section Project documents publicly available on the registry, at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#project-documents-publicly-available-on-the-registry>. It

Ongoing Compliance

- Additionality is re-assessed at each crediting period renewal. This is stated in the Procedures Manual:

“Upon renewal of the crediting period, projects must comply with the most recent version of the applicable methodology and the Rainbow Standard Rules, and undergo a new validation assessment by performing the following steps, including all elements described in the Project validation section:

- Preparation of a new PDD, with updated responses to all principles and requirements, updated GHG quantification, and an updated selection of a baseline scenario
- Validation audit...”

The full contents of these procedures can be found in the Procedures Manual, section Project certification, sub-section Crediting period renewal, at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#crediting-period-renewal>

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):

N/A

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):

- All additionality and baseline-setting assessments for Rainbow projects, regardless of the test or method used, are **mandatorily reviewed and validated by an accredited, independent Validation and Verification Body (VVB) upon project validation.** The requirements are described in the following extract about Validation audit requirements:

“All projects shall undergo a validation audit with an accredited third-party VVB to become eligible for issuing RCCs.

Once the Rainbow team completes the PDD review, and approves of the PDD, the Rainbow team puts

together the Validation audit package, containing the elements listed below, available to the third-party VVB on the Certification Platform.

VVB shall follow the VVB requirements, to define the audit team, scope and plan.

*The audit package **shall contain the following elements:***

- *PDD*
- *Risk assessment (Environmental and Social Risk Assessment, Reversal Risk Evaluation)*
- *Additionality template*
- *Baseline setting ...”*

The full content of these requirements can be found in the Rainbow Procedures Manual, section Project certification, sub-section Validation audit, at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation-audit>

- b) Rainbow reviews additionality and baseline-setting assessments in the PDD review, before the VVB’s validation audit, plus the Project validation review step, after the VVB has completed the validation audit. The requirements state:

PDD review

“The Rainbow team evaluates the PDD and any supporting documents to ensure they respect Rainbow’s general and methodology GHG quantification steps and eligibility requirements.”

Project validation review

“Once approved by the VVB, the PDD is sent back to the Rainbow Team to review the VVB’s remarks, and evaluate feedback from the registry public comment period.

The Rainbow Certification Team ensures that the VVB has followed the VVB requirements and thoroughly audited the following elements:

- *Project Design Document (PDD)*
- *Risk assessment (i.e. Environmental and Social Evaluation, Reversal Risk Evaluation)*
- *Additionality template*
- *Monitoring Plan*
- *GHG quantification spreadsheets (extracts from Rainbow Certification Platform)*
- *Stakeholder consultation materials”*

The full content of these requirements can be found in the Rainbow Procedures Manual, section Project certification, sub-section PDD review at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#pdd-review> and for Project validation review, at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#project-validation-review>

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 a “positive list” of eligible project types)(<i>Paragraph 3.1</i>):	
a) Are the criteria for such positive lists conservative?	<input type="checkbox"/> YES
b) Are these criteria publicly disclosed?	<input 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 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):

Rainbow does not automatically designate certain activities as additional.

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., sector-wide performance benchmarks or standards, which do not rely on business-as-usual analysis</i>) 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) Rainbow’s baseline-setting procedures require that **all methods—whether modelling, benchmarking, or historical data—use conservative assumptions, robust methodologies, and transparent values** to prevent overestimation. Baselines must be **realistic, defensible, conservative, and transparent**, with all

assumptions, data sources, and models fully justified and documented in the methodology and Project Design Document (PDD).

“Baselines shall be set according to the following principles:

-
- *Conservative: The baseline shall be set in a conservative way that does not lead to overestimating project benefits and over issuing RCCs. In cases of uncertainty, the modeling approach, assumptions, and data sources for the baseline scenario should adopt conservative estimates.”*

Furthermore, uncertainty in setting the baseline is addressed by adopting conservative estimates, as described in the following extract:

“The degree of conservativeness in this choice shall be based on the level of the overall uncertainty, taking into account the choice of assumptions, models, parameters, data sources, measurements methods and other factors (e.g., assuming a better-performing baseline in case of higher uncertainties).”

The full content of these requirements can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section General baseline setting requirements and Approach to setting the baseline, at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#baseline-scope>

This is enforced through VVB validation and Rainbow review of all baseline choices during validation:

“The choice of the baseline scenario is approved by the Rainbow team, and audited by the third-party VVB in the validation audit and the ongoing verification audits.”

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section General baseline setting requirements at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#general-baseline-setting-requirements>

- b) Rainbow mandates that baselines are set **conservatively and below business-as-usual (BAU) projections**. The baseline must represent a plausible, technically justified scenario that does not inflate mitigation outcomes. Projects must account for regulatory conditions, market context, and rebound effects, and must demonstrate that the baseline is at least as stringent as the standard performance of comparable activities. The following extract states the requirements for setting conservative baselines:

“Baselines shall be set according to the following principles:

-
- *Conservative: The baseline shall be set in a conservative way that does not lead to*

overestimating project benefits and over issuing RCCs. In cases of uncertainty, the modeling approach, assumptions, and data sources for the baseline scenario should adopt conservative estimates.”

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section General baseline setting requirements at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#general-baseline-setting-requirements>

The following extract states the requirements for setting below BAU baselines:

*“The selected baseline scenario shall be highly **representative of the standard performance of comparable practices and processes** in similar social, economic, environmental, technological and regulatory circumstances. It shall take into account the geographical context, including local environmental and market conditions. After identifying the representative baseline scenario, conservative choices shall be made to **adjust this baseline downward and result in below-BAU baseline emissions.**”*

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section Approach to setting the baseline at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#approach-to-setting-the-baseline>

This is enforced through VVB validation and Rainbow review of all baseline choices during validation:

“The choice of the baseline scenario is approved by the Rainbow team, and audited by the third-party VVB in the validation audit and the ongoing verification audits.”

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section General baseline setting requirements at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#general-baseline-setting-requirements>

- c) For non-traditional baselines (such as sector-wide benchmarks or standardized baselines), the same requirements apply as mentioned above, to **demonstrate that these baselines are as conservative and representative as a project-specific BAU analysis.**

“Baselines shall be set according to the following principles:

- ...
- *Conservative: The baseline shall be set in a conservative way that does not lead to overestimating project benefits and over issuing RCCs. In cases of uncertainty, the modeling approach, assumptions, and data sources for the baseline scenario should adopt conservative estimates.”*

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section General baseline setting requirements at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#general-baseline-setting-requirements>

The following extract states the requirements for setting below BAU baselines:

*“The selected baseline scenario shall be highly **representative of the standard performance of comparable practices and processes** in similar social, economic, environmental, technological and regulatory circumstances. It shall take into account the geographical context, including local environmental and market conditions. After identifying the representative baseline scenario, conservative choices shall be made to **adjust this baseline downward and result in below-BAU baseline emissions.**”*

Standardized baselines must be updated at least every five years, as outlined in the following text:

“Standardized baselines shall be updated in the methodology at a minimum every 5 years. Activity-specific baselines shall be updated for a given project at a minimum frequency of each crediting period renewal.

The chosen baseline for a project may be revised more frequently due to changing baseline conditions, such as regulatory or market changes.

A project's updated baseline shall be audited by the VVB upon the next verification.”

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section Updating the baseline at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#updating-the-baseline>

This is enforced through VVB validation and Rainbow review of all baseline choices during validation:

“The choice of the baseline scenario is approved by the Rainbow team, and audited by the third-party VVB in the validation audit and the ongoing verification audits.”

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section General baseline setting requirements at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#general-baseline-setting-requirements>

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

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
--	---

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):

Rainbow requires projects to **respond to unexpected changes in baseline conditions** (such as new regulations, market shifts, or technological advancements) through the following requirements:

“Standardized baselines shall be updated in the methodology at a minimum every 5 years. Activity-specific baselines shall be updated for a given project at a minimum frequency of each crediting period renewal.

The chosen baseline for a project may be revised more frequently due to changing baseline conditions, such as regulatory or market changes.

A project's updated baseline shall be audited by the VVB upon the next verification.”

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section Updating the baseline at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#updating-the-baseline>

All baseline updates must maintain conservativeness and are subject to Rainbow’s approval, according to the Rainbow Standard Rules and the following five key principles for baseline setting:

“Baselines shall be set according to the following principles:

- **Realistic:** *The baseline shall include the likely, appropriate, technically-plausible scenario and/or product that is substituted by the project mitigation activity.*
 - *For projects that manufacture a product, and claim RCCs from their product's substitution of a baseline product, Project Developers shall prove that their product has similar performance metrics to the baseline product and delivers equivalent functions. Project Developers shall identify and quantify performance metrics to compare between the baseline and the project scenario.*
- **Defensible:** *The method for setting the baseline shall be backed up by verifiable, reputable proof. Where specific proof is not available, and assumptions are made, these shall be transparently ds*
- **Conservative:** *The baseline shall be set in a conservative way that does not lead to overestimating project benefits and overissuing RCCs. In cases of uncertainty, the modeling approach, assumptions, and data sources for the baseline scenario should adopt conservative estimates.*
- **Transparent:** *The baseline, the method for setting baselines, and/or their underlying assumptions shall be transparently described, with proof and justification, in the methodology and PDD. The choice of the baseline scenario is approved by the Rainbow team, and audited by the third-party VVB in the validation audit and the ongoing verification audits.*
- **Consistent:** *The quantification approach for the baseline scenario shall be comparable to the project scenario. Methodologies shall establish baseline scenarios, or baselining setting methodologies, that*

ensure consistent results across similar circumstances.”

The full content of this requirement can be found in the Rainbow Standard Rules, section Project and baseline scope, sub-section General baseline setting requirements at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/project-and-baseline-scope#general-baseline-setting-requirements>

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
--	---

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):

Rainbow ensures **full public disclosure** of all baselines and their underlying assumptions. Projects must document and justify their baseline choices, methods, data sources, and assumptions in the **Project Design Document (PDD)**, which is required to be made publicly available on the Rainbow registry. This is outlined in the following requirement extracted from the Standard Rules:

“PDDs shall contain, at a minimum, the following information:

- *GHG quantification*
 - *Information on how the methodology was applied for the purpose of*
 - *determining the baseline,*
 - *demonstrating additionality and*
 - *quantifying GHG emission reductions or removals, including but not limited to assumptions, data sources, and emission sources/sinks, that are not already defined at the methodology level”*

PDDs, including the abovementioned baseline setting information are required to be made publicly available on the Rainbow Registry, according to the following requirement extracted from the Procedures Manual:

“The following information must be publicly accessible in linked project documents available on the registry:...

- *The Project Design Document (PDD) and any subsequent Monitoring Reports, with the following minimum content:*
 - *...*
 - *GHG quantification*
 - *Information on how the methodology was applied for the purpose of*
 - *determining the baseline”*

The full content of this requirement can be found in the Rainbow Procedures Manual, section Project certification, sub-section PDD creation, sub-section Minimum requirements for the PDD at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#minimum-requirements-for-the-pdd>

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):

Please find below an example of the baseline setting procedure for a project “Engrow - India - New biochar production unit”, Project ID [RIV-2025-PROJ-146](#), using the methodology Biomass carbon removal and storage (BiCRS).

For some context, in addition to producing biochar and issuing removal credits, the project produces bio-oil as an energy co-product. This co-product replaces fossil fuels in industrial uses, for which Rainbow issues **avoidance credits**, and sets the baseline scenario as outlined below.

“1.4.4. Energy-Co -Product : Baseline

Engrow’s pyrolysis process generates bio-oil, a liquid co-product alongside its primary output. The process involves feeding biomass into a pyrolyser, where it is thermally decomposed in the absence of oxygen. The resulting syngas is then condensed, and the liquid fraction, known as bio-oil, is collected in a dedicated storage tank. It is a complex mixture of oxygenated organic compounds, water (15–30%), and solids, resulting in a dark brown, viscous liquid with a smoky odor. While it has an energy content lower than diesel, it is characterized by its renewable origin (Oasmaa & Peacocke, 201012).

In 2025, the bio-oil produced by Engrow was sold exclusively to Grassroots, a biomass trading company. Grassroots supplied the bio-oil to Seshasayee Paper and Boards Ltd., a paper manufacturing facility located in Erode, Tamil Nadu State.

At this facility, the bio-oil was utilized as a direct replacement for furnace oil in their industrial furnaces. Furnace oil, a heavy residual fuel derived from petroleum, is commonly used in high-temperature industrial processes such as those found in paper manufacturing (like black liquor evaporation, chemical pulp making, and the drying of paper)¹³. The energy density of bio-oil is lower than that of furnace oil, which typically ranges from 39–41 MJ/kg, requiring adjustments in fuel volume to achieve equivalent energy output....

1.4.5. Energy Co-Product: Quantity and Type

The project activity involves the production of bio-oil through pyrolysis, specifically intended as a substitute for furnace oil in industrial applications. The substitution is calculated on the basis of equivalent energy content, with laboratory reports indicating that the bio-oil produced by Engrow has a gross calorific value of 38.4 MJ/kg (9,180 kCal/kg). For comparison, furnace oil is assumed to have a gross calorific value of 44.2 MJ/kg (Oasmaa &

Peacocke, 2010, Table G5). This results in a substitution factor of 0.86 kg of furnace oil per kg of bio-oil.

The calculation assumes direct use of bio-oil without further processing or blending post-pyrolysis. It does not account for potential variations in combustion efficiency or bio-oil quality, as the replacement is based solely on energy equivalence. Over the reporting period, a total of 217 t of bio-oil was supplied, which corresponds to the displacement of approximately 189 t of furnace oil.”

The uncertainty of the baseline setting is described here:

“4.3.2. Assumptions and uncertainties

Energy co-products

Assumptions:

- Bio-oil produced by the pyrolysis is assumed to substitute diesel for industrial application. While the exact substituted product is furnace oil, diesel remains a good representative of fossil fuel to be a good proxy. This has a low level of uncertainty.

Measurements:

- The amount of bio-oil delivered was measured with invoices delivered by Engrow. These measurements are primary, and have a low level of uncertainty. The gross calorific value of Engrow’s bio-oil was measured at 9180 kcal/kg by SGS (38.4 MJ/kg). This measurement is primary and has a low level of uncertainty.

Estimates or secondary data used for the project assessment:

- The conversion ratio between bio-oil and diesel is estimated to be 0.86 kg diesel/ kg bio-oil. It is based on the gross calorific value of the diesel (44.2 MJ/kg) (Oasmaa & Peacocke, 2010, Table G519). This has a low level of uncertainty”

The full content can be found in the project’s PDD, accessible on their project page.

Here is the link to the project page: <https://registry.rainbowstandard.io/projects/RIV-2025-PROJ-146>

Here is the link to the PDD, in sections 1.4.4. Energy-Co -Product : Baseline, 1.4.5. Energy Co-Product: Quantity and Type, and 4.3.2. Assumptions and uncertainties. The PDD is available at this link: <https://arc.rainbowstandard.io/document/0f030db2-9141-47b7-b76f-d4710003af5e> .

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? (Paragraph 3.3.4)	<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):

Rainbow requires that all crediting period renewals include a comprehensive re-validation of the project, which

includes a re-evaluation of all project components that were initially validated by the VVB for the project acceptance at the validation audit, including but not limited to the following updates:

- Baselines are updated to reflect current regulatory, market, and technological conditions, and remain conservative and realistic.
- Quantification and monitoring procedures are reviewed and adjusted as needed to maintain accuracy and conservativeness.
- Assumptions and data sources are re-assessed for continued validity and relevance.

This is described in the following requirement from the Procedures Manual:

“Upon reaching the end of the crediting period, the crediting period must be renewed for the project to remain registered with Rainbow, and to continue issuing credits.

Upon renewal of the crediting period, projects must comply with the most recent version of the applicable methodology and the Rainbow Standard Rules, and undergo a new validation assessment by performing the following steps, including all elements described in the Project validation section:

- ***Preparation of a new PDD, with updated responses to **all principles and requirements, updated GHG quantification, and an updated selection of a baseline scenario*****
- *Validation audit*
- *Site audit*
- *Stakeholder consultation*
- *Project validation review”*

The full content of this requirement can be found in the Rainbow Procedures Manual, section Project certification, sub-section Crediting period renewal, at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#crediting-period-renewal>

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 between verification events?	<input checked="" type="checkbox"/> YES
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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):

The maximum allowable number of years between verification events is 24 months, although methodologies

may specify a shorter amount of time. This is defined in the Procedures Manual:

*“Monitoring period: the duration of project activities covered by a single monitoring report, and eligible for credit issuance. The default monitoring period duration is one year, but may be shorter at the Project Developer's request for more frequent credit issuance. The first monitoring period may begin up to 18 months before the registration date, and **subsequent monitoring periods shall be no longer than 24 months long.**”*

The full requirement can be found here in the Procedures Manual, section Project certification, subsection Timeline:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#timeline>

Projects that have exceeded the allowable time between verification events will be deregistered, after which they must undergo a new validation to re-register, which includes but is not limited to a full re-evaluation of the baseline, quantification methods, monitoring plans, and verification procedures. This is defined in the Procedures Manual:

“Projects shall be automatically deregistered if they do not conduct monitoring and verification according to the minimum specified frequency (every 1 or 2 years, depending on the methodology).

*Once a project is deregistered, it must **undergo a new validation assessment and audit** in order to become registered and issue credits again.”*

The full requirement can be found here in the Procedures Manual, section Project certification, subsection Deregistration:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#deregistration>

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):

N/A

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):

Rainbow supports some sectors and activity types that present a potential risk of reversal of emissions reductions, avoidance, or carbon sequestration. These include:

1. BioCCS with Geological Storage carries a **very low reversal risk**, depending on the integrity and monitoring of storage sites.
2. Biobased Construction Materials may present low to **moderate reversal risks**, depending on the durability of the materials, their use phase, and end-of-life management. This methodology is being reviewed at the moment and has been excluded from the CORSIA eligibility assessment. **Rainbow is not seeking CORSIA eligibility for this methodology.**

For the avoidance of doubt, Rainbow does not currently support afforestation/reforestation, soil carbon sequestration, or other nature-based activities with higher reversal risks. Pathways such as biochar, mineralization, and enhanced rock weathering are considered to have **very low to no** reversal risks under Rainbow's current methodologies. For more details, see the Durability and Reversal Risk Assessment section of the Standard Rules, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#reversal-risk-assessment>

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

Rainbow is currently working on the methodology development for **BioCCS (Biogenic Carbon Capture and Storage)**. The methodology is currently under development and will be published for public consultation in April 2026, and finalised in Q2 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):

The minimum scale of reversal which Rainbow requires notification is for at least 1 tCO₂e as stated, "A GHG reversal is defined as any event that re-emits at least 1tCO₂e of the carbon removed by the project mitigation activity, before the monitoring period ends."

This can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph on "Canceling removal credits due to reversals", available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

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) Rainbow Standard requires all removal projects with potential reversal risks to undergo a thorough reversal risk assessment during validation. This process is structured with the following steps: methodology level provided by Rainbow Science team, project level conducted by the Project Developer, review by Rainbow Certification team and validation by an accredited VVB.

- **Methodology-Level Reversal Risk Assessment:** *“Methodologies shall assess the risk of reversals for the technology type. Where material risk is identified, they shall establish project design requirements that mitigate reversal risk, which may render the reversal risk negligible or lowered.”* At this level, the focus is on the technology type used by the project. The methodology assesses the inherent risks of reversal associated with the specific carbon removal technology (e.g., the Rainbow Marine Sub-Sediment Burial Risk Evaluation for marine burial projects). Methodologies evaluate the general risks of reversal for the technology, considering factors such as environmental, social, and delivery risks, and provide a list of minimum reversal risks to assess for each project under that methodology.

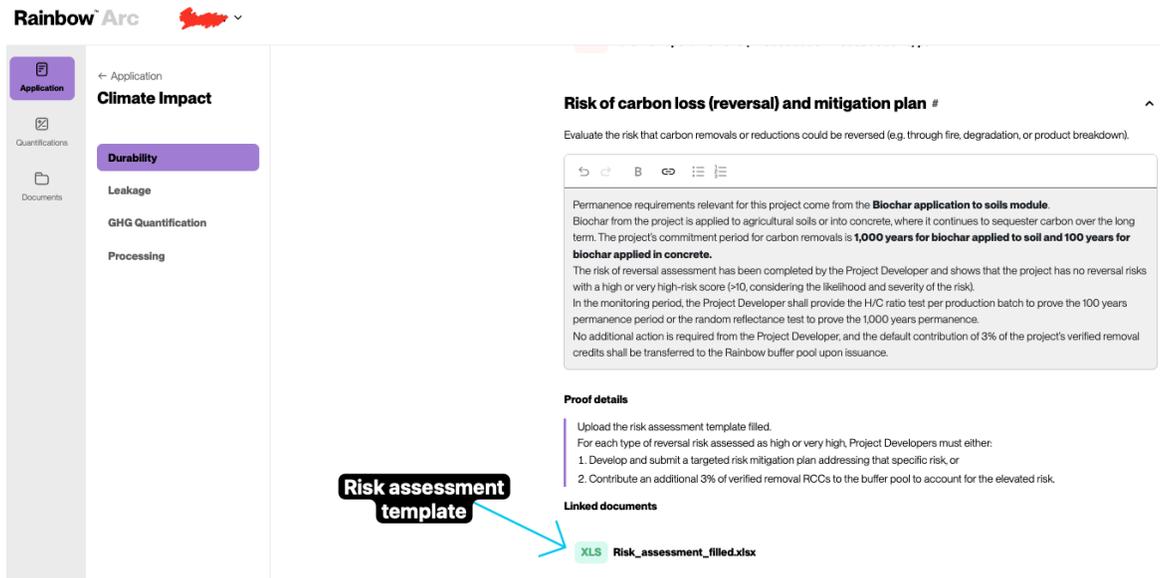
Example of reversal risk assessment for Marine Sub-sediment module can be found at: <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-storage/marine-sub-sediment-burial#risk-evaluation-template>

- **Project-Level Reversal Risk Assessment:** *“All projects eligible for removal RCCs under methodologies that have identified outstanding material reversal risks must assess reversal risks during the validation step. An assessment procedure and a minimum list of reversal risks to assess shall be provided in each methodology, tailored to the specific technology. Further details on completing the assessment are in the Reversal risk assessment instructions section below.”* At the project level, the assessment is project-specific and conducted during validation. It uses the templates and procedures defined by the methodology but adapts them to the unique context of the project. Project Developers must assess the likelihood and severity of each identified risk for their specific project, using the methodology’s template. Risks are scored, and material risks (moderate or higher) require a risk mitigation plan.

Here is an example that can be found through the PDD of project RIV-2025-PROJ-104, Biokol -

Sweden - New biochar production site, using the BiCRS methodology, on the registry:
https://docs.google.com/spreadsheets/d/144rHkP26Jgh8ZdU5z3yaT_PsmEZqz5lxt9piWrIFuxU/e/dit?gid=2002717950#gid=2002717950

- The above requirements can be found in the Standard Rules, section Principles and requirements, paragraph on “Reversal risk assessment”:
<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#reversal-risk-assessment>
- Through the certification journey Project Developers are requested to use the Rainbow Certification platform and provide the Risk assessment template which is reviewed by the Rainbow Certification team before submission to validation audit. See screenshot below:



- “Once the Rainbow team completes the PDD review, and approves of the PDD, the Rainbow team puts together the Validation audit package, containing the elements listed below, available to the third-party VVB on the Certification Platform.

VVB shall follow the VVB requirements, to define the audit team, scope and plan.

The audit package shall contain the following elements :

- PDD
- Risk assessment (Environmental and Social Risk Assessment, Reversal Risk Evaluation)”

Validation procedures can be found in the Procedures Manual, section Project certification, paragraph on “Validation”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#validation>

- b) Projects must include all identified material reversal risks in their Monitoring Plan, with regular monitoring throughout the crediting period - and potentially beyond depending on the requirements of the methodology - until risks are deemed negligible.

Projects shall follow instructions provided in the Revesal risk assessment paragraph of the Standard

Rules and states *“that some risks shall be monitored and reported regardless of the risk score. These are defined at the methodology level, and include technology-specific risks that are particularly sensitive, likely, or variable, and/or subject to project design requirements.”*

This is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#reversal-risk-assessment-instructions>

Furthermore monitoring requirements are tailored to each project type and are enforced through verification audits. *“Project Developers shall monitor and report ongoing key parameters about their activities, with proof, to demonstrate that:*

- ...
- *the measures established in the Reversal risk assessment are in place,”*

Screenshot of the monitoring template:

Rainbow Monitoring Report - [project_name]



Mitigation measures from the ESS & Reversal risk assessment

The following mitigation measures were audited as part of the project’s Environmental and Social Safeguard Risk Assessment and Reversal risk assessment. These measures are monitored in accordance with the project’s Monitoring Plan, as detailed in the Project Design Document (PDD).

Table 3. Audited mitigation measures

Mitigation measure	Audited measure or Parameter	Sources
Mitigation measures 1		

The monitoring requirements can be found in the Standard Rules, section Principles & requirements, paragraph “Monitoring”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#monitoring>

The Monitoring Plan template can be found in the Procedural template on the Rainbow Documentation hub and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/annual-monitoring-template>

- c) For each material risk identified, projects must develop and implement a **risk mitigation plan**, detailing strategies for prevention/mitigation, monitoring and reporting. The Standard Rules, section Principles & requirements, paragraph “Monitoring”,
- “Any remaining reversal risks that could not be fully prevented and deemed negligible by risk mitigation shall be monitored regularly and added to the project’s Monitoring Plan. Methodologies shall define whether reversal monitoring requirements are set at the methodology level, and/or whether they shall be*

assessed at the project level. Reversal monitoring may continue after the project's crediting period ends, until a negligible risk of reversal has been proven, using models or other scientifically-backed methods."

This is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#reversal-risk-assessment-instructions>

Mitigation measures are audited by VVBs and updated as needed, based on the Monitoring plan, see b) for details.

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

N/A

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) Rainbow places full liability on Project Developer create and implement risk mitigation plans to **monitor, mitigate, and respond to reversals** according to the programme’s procedures. This is outlined in the Standard Rules:

“Where a material risk of reversal is identified in the project reversal risk assessment step, Project Developers shall address those risks by creating a risk mitigation plan. The risk mitigation plan shall account for both the technology type and the project design, and outline how the project will prevent, monitor, report and compensate identified reversal risks...”

Each identified material risk (defined as issues with a risk score of moderate or higher) is subject to creation of a risk mitigation plan, developed by the Project Developer, that details the long-term strategies and investments for preventing, monitoring, reporting and compensating carbon removal reversal and/or environmental and social damages.”

The full requirement is in the Rainbow Standard Rules, section Principles and requirements, sub-section Durability, sub-section Project-level reversal risk assessment, at this link: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#project-level-reversal-risk-assessment>, and under the sub-section Reversal risk assessment instructions at this link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#reversal-risk-assessment-instructions>

[requirements#reversal-risk-assessment](#) .

In the unlikely event of a reversal, the credit cancelation and compensation procedure described in the Rainbow Carbon Credits section of the Procedures Manual shall be applied:

“The Project Developer must submit a Cancelation Notice to notify Rainbow within 30 calendar days of becoming aware of the reversal event. Rainbow shall then cancel an equivalent amount of RCCs from the buffer pool, matching the tCO₂eq estimated to have been released in the reversal event.”

This can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph on “Canceling removal credits due to reversals”:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

Furthermore, the Standard Rules requirements for the Monitoring Plan specifies:

“Project Developers shall monitor and report ongoing key parameters about their activities, with proof, to demonstrate that:

- *the ex-post mitigation activity has occurred,*
- *the GHG quantification and credits issued are accurate and real,*
- *any mitigation measures established in the Environmental and social risk assessment are implemented,*
- ***any measures established in the Reversal risk assessment are in place...***

This can be found in the the Standard Rules, section Principles and requirement, paragraph on “Monitoring”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#monitoring>

Project Developers must submit frequent Monitoring Reports, audited by accredited independent auditors, ensuring Projects Developers consistently mitigate and monitor the reversal risks, as outlined in the Procedures Manual:

“Project Developers shall submit a Monitoring Report at least once per 24 months.”

This can be found in the Procedures Manual, section Project certification, paragraph on “Monitoring”, at the following link:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#monitoring>

- b) Project proponents must immediately notify Rainbow of any material reversal event, with formal reporting required within 30 days of detection, by submitting a **Cancellation Notice** to Rainbow, following these requirements:

“The Project Developer must submit a Cancellation Notice to notify Rainbow within 30 calendar days of becoming aware of the reversal event. Rainbow shall then cancel an equivalent amount of RCCs from the buffer pool, matching the tCO₂eq estimated to have been released in the reversal event.

This procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Cancellation”, sub-section Canceling removal credits due to reversals, and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

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

N/A

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>)	<input checked="" 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):

Upon notification of a material reversal event, Rainbow is responsible for ensuring and confirm full compensation as follows:

- **Verification:** The reversal event is investigated by the Rainbow team and deemed avoidable or unavoidable, to outline the applicable compensation requirements:

“Classification of a reversal as avoidable or unavoidable will be decided by Rainbow, following inputs from the Project Developer and a VVB.”

“After investigation by the Rainbow team, and the execution of the applicable compensation, a Cancellation Report is generated, confirming or updating the information of the Cancellation Notice and stating the party responsible for the compensation.”

This procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Cancellation”, sub-section Canceling removal credits due to reversals, and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

- **Compensation:** Rainbow cancels the equivalent amount of credits from the reversal from the buffer pool.

“The Project Developer must submit a Cancellation Notice to notify Rainbow within 30 calendar days of

becoming aware of the reversal event. Rainbow shall then cancel an equivalent amount of RCCs from the buffer pool, matching the tCO₂e estimated to have been released in the reversal event”

This procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Cancellation”, sub-section Canceling removal credits due to reversals, and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

Project Developers are responsible for compensating those canceled credits depending on if the reversal was avoidable or unavoidable:

“Reversals are classified as avoidable or unavoidable. The replacement of canceled credits in the buffer pool shall be managed according to the procedure in Table 1, depending on the type of reversal.”

Table 1 The different types of reversals are defined. In case of any reversal, credits from the Buffer Pool of the same type are canceled to compensate the reversal. The Buffer Pool replacement requirements column outlines the requirements for Project Developers to replace those canceled Buffer Pool credits, depending on the reversal type.

Type of reversal	Definition	Buffer Pool replacement requirements
Avoidable	<p>Reversal that</p> <ul style="list-style-type: none"> ● results from actions or omissions within the project’s control, ● could have been prevented with reasonable foresight and risk mitigation ● typically a result of failure to maintain equipment, follow protocol, or update systems; human error or negligence; or foreseeable and mitigable natural disturbances. 	<p>The Project Developer shall fully compensate the cancelled Buffer Pool credits with credits of the same type,</p> <p>The Project Developer shall do this by either:</p> <ul style="list-style-type: none"> ● transferring already issued credits from their project/s to the buffer pool immediately; ● transferring all credits issued in future monitoring periods from their project/s to the buffer pool, or ● purchasing credits of the same type, and transferring them to the buffer pool.
Unavoidable	<p>Reversals that</p> <ul style="list-style-type: none"> ● are caused by events beyond reasonable control or prediction, ● where mitigation was not feasible or would have imposed unreasonable burden, ● resulted from natural disasters (e.g. wildfire, earthquake, extreme weather); pest or disease outbreaks; or policy or regulatory change beyond project control 	<p>The Project Developer is not liable for replacing the buffer pool credits.</p>

This procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Cancellation”, sub-section Canceling removal credits due to reversals, and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

If the buffer pool is insufficient for **compensating avoidable reversals**, the Project Developer must compensate by transferring credits from their own projects or purchasing equivalent credits:

“If the buffer pool holds an insufficient balance of RCCs to fully compensate a project's avoidable reversal event, all subsequent removal RCCs of the same type issued by the Project Developer shall be transferred to the buffer pool and immediately canceled until the full amount of the reversal has been compensated.”

This procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Cancellation”, sub-section Cancellation and insufficient buffer pool size, and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#cancellation-and-insufficient-buffer-pool-size>

- **Cancellation Report:** following investigation and oversight of the completion of the required compensation mechanism, Rainbow generates and publishes a Cancellation Report, detailing the outcome and steps taken to fully compensate for the reversal. This report is attached to the cancellation event in the Rainbow Registry and includes the original Cancellation Notice.

“A Cancellation Report will be generated and attached to the cancellation event in the Registry, that includes the Cancellation Notice provided by the Project Developer, plus a detailed description of the outcome and steps taken to fully compensate the reversal.”

This procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Cancellation”, sub-section Canceling removal credits due to reversals, and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

- **Public disclosure and oversight:** All actions related to reversals, cancellation and compensation are documented and publicly disclosed on the Rainbow Registry. The registry cancellation list can be found here: <https://registry.rainbowstandard.io/ledger/canceled-credits> The Cancellation Notice and Report are published on the project page. For the avoidance of doubt, Rainbow has not canceled credits during its operations.

“A Cancellation Report will be generated and attached to the cancellation event in the Registry, that includes the Cancellation Notice provided by the Project Developer, plus a detailed description of the outcome and steps taken to fully compensate the reversal.”

This procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Cancellation”, sub-section Canceling removal credits due to reversals, and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

[dits#canceling-removal-credits-due-to-reversals](#)

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

N/A

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 checked="" 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 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):

All Rainbow Carbon Carbon credits are issued ex-post. We understand this question to be focused on activities with a high risk of reversal, and for the avoidance of doubt, Rainbow does not currently have methodologies for activities with a high risk of reversal.

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

Rainbow’s upcoming BioCCS methodology, currently under development, will follow the EU's CCS Directive and therefore have the requirement to monitor for up to 20 years after the crediting period. The methodology is currently under development and will be published for public consultation in April 2026, and finalised in Q2 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
---	---

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, all emissions units allocated to the Buffer Pool must be derived from activities carried out by Rainbow validated projects. Shall a project issue CORSIA-eligible units the portion of units transferred to the buffer shall also be CORSIA-eligible.

“All projects that issue removal RCCs are required to allocate at least 2% of their verified removal RCCs to the

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.

Rainbow Buffer Pool. Methodologies may determine a higher minimum buffer pool contribution for projects under them, and/or further instructions for how to determine a project-specific buffer pool contribution amount.

This pool acts as an insurance mechanism against the risk of reversal of sequestered carbon before the agreed upon commitment period. RCCs shall be canceled from the buffer pool if there is a reversal event (see details in the Cancellation section). This may occur due to, for example, natural disaster (fires, drought, pests) or project mismanagement. These RCCs cannot be retired by buyers. The buffer pool is shared across all projects.”

This is set out in the Rainbow Procedures Manual, section Rainbow Carbon Credits, paragraph on “Buffer pool” accessible at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#buffer-pool>

Therefore, the credits set aside in the Buffer Pool for compensation of reversals would by definition also meet the criteria of CORSIA eligible emissions units, since they are the same type of units. And the procedure for “Canceling removal credits due to reversal” applies, which states:

“The canceled RCCs must correspond to the same type as the reversed removal RCCs, including durability and labels.”

This procedure is available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#canceling-removal-credits-due-to-reversals>

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

N/A

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? (<i>Paragraph 3.5.7</i>)	<input checked="" 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):

Yes, Rainbow is willing and able to demonstrate, upon request, that its permanence provisions fully compensate for any reversal of mitigation issued as emissions units, and used under CORSIA.

The list of available credits in the buffer pool may be downloaded by any stakeholder at the bottom of the “Issued credits” page.

ISSUANCE DATE	QUANTITY	YEAR	MECHANISMS	COUNTRY	DEVELOPER	STATUS
23 Dec 24	4368	2023	Avoidance	UK	Alchemy Telco Solutions Limited	E-Refurb
23 Dec 24	5316	2023	Avoidance	Ireland	Alchemy Telco Solutions Limited	E-Refurb

Page Size: 50 | 1 to 50 of 118 | Page 1 of 3

Buffer pool

The Rainbow Standard requires removal projects to transfer a portion of their issued credits to the buffer pool to cover a minimum inherent reversal risk. You can review the credits currently held in the buffer pool by clicking below.

[Download summary](#)

This registry public page is available at this weblink: <https://registry.rainbowstandard.io/ledger/issued-credits>

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

Rainbow Registry will be updated by the end of Q2 2026 to make the buffer pool credits summary more accessible with a dedicated page accessible from the registry landing page, with a dedicated “Buffer pool” page to list available credits in the Buffer pool.

See a screenshot of the expected view:

Rainbow | Documentation | rainbowstandard.io | Login | Create account

Rainbow carbon credit registry

Total tons of carbon dioxide verified
17,000 tCO₂e_q
As of 31 October 2024

Projects | Retirements | Issuances | Cancellations | Credits | **Buffer pool**

Search

PROJECT ID	NAME	VINTAGE	MECHANISMS	DURABILITY	LABELS	DEVELOPER	AV
IV-2023-PROJ-5	Agro Bioenergies - France - New biogas for agri-waste unit	2024	Removal	1000 yrs, 500 yrs	CORSIA, ICVCM	Lorem	12%
IV-2023-PROJ-6	Alt Eco - France - New devices refurbishment center - Rhône	2024	Avoidance			Ipsium	12%
IV-2023-PROJ-7	Biokol - Sweden - New biochar production site	2024	Removal	1000 yrs, 500 yrs, 100 yrs, 50 yrs, 50 yrs	CORSIA, ICVCM, DGEC, 2 more	Dolor	12%
IV-2023-PROJ-7	Biokol - Sweden - New biochar production site	2024	Removal	1000 yrs	CORSIA	Sit	12%

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):

Rainbow is willing and able to demonstrate that its permanence provisions fully compensate for any reversal of mitigation issued as emissions units, and used under CORSIA, by providing:

- Documentation of buffer pool contributions, risk assessments, and mitigation plans for all CORSIA-eligible projects.
- Public disclosure of all reversal events and cancellation on the [Rainbow Registry](#), ensuring transparency and compliance with CORSIA requirements.
- Technical justification that the 2% minimum buffer pool, combined with project-level liability and conservative baseline setting, ensures full compensation for any material reversals.

Rainbow’s procedures are designed to meet and exceed CORSIA’s permanence and compensation standards.

As explained in the answer to Q2, the Rainbow rules and procedures regarding the assessment, mitigation and monitoring of reversal risk are very important actions to reduce the risk of reversal which make a reversal event highly unlikely.

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

N/A

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):

Rainbow Standard Rules defines leakage as being *“the displacement of emitting activities from the project scope to areas outside the project scope, resulting in an indirect transfer of GHG emissions rather than the absolute avoidance/removal of emissions.”*

This rule can be found in the Standard Rules, section Principles & requirements, paragraph on “Leakage”, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

Rainbow currently identifies the following sectors/activity types as presenting a **potential risk of material emissions leakage**:

Methodology	Leakage Risk Notes	Reference
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<p>Biomass Carbon Removal and Storage (BiCRS) - Biomass module</p>	<p>Risk of indirect land-use change or displacement of biomass sourcing, if not managed according to methodology requirements.</p>	<p>https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-capture/biomass-feedstock#lc9eewbyvlyk</p>
<p>Mineralization of Alkaline Materials (ex situ)</p>	<p>Potential leakage from upstream material sourcing or energy use, if not accounted for in project boundaries.</p>	<p>https://docs.rainbowstandard.io/methodologies/mineralization-of-alkaline-materials-ex-situ/eligibility-criteria#ekfzu5nkmdm</p>
<p>Enhanced Rock Weathering (ERW)</p>	<p>Risk of emissions displacement in mining, transport, or application of rock materials.</p>	<p>https://docs.rainbowstandard.io/methodologies/enhanced-rock-weathering/eligibility-criteria#leakage</p>
<p>Battery Second Life</p>	<p>Risk of emissions leakage if improper end-of-life management or displacement of battery production occurs outside project boundaries.</p>	<p>https://docs.rainbowstandard.io/methodologies/battery-second-life/eligibility-criteria#leakage</p>
<p>Refurbishing of Electronic Devices</p>	<p>Potential leakage from displaced production or waste management outside the project scope.</p>	<p>https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/principles-and-requirements#viuf5av97jb8</p>

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

Biomass carbon removal and storage (BiCRS) methodology will undergo a revision and restructuring. Currently it is a “modular methodology”, with requirements at both the methodology level (BiCRS document, here <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs>) and the module level (e.g. Biochar application to soils module, here <https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-storage/bio>

[char-application-to-soils](#)). The revision will remove the modular structure, and result in complete methodologies, for example instead of the Biochar application to soils module which is used in conjunction with the Biomass feedstock module, we expect to have a new Biochar methodology that takes requirements from the current BiCRS methodology, Biochar application to soils module, and Biomass feedstock module. This change will take place near **the end of May 2026**.

Q9.b) What is the minimum scale of leakage 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):

The Rainbow Standard Rules require projects to identify, quantify, and mitigate leakage risks during validation and verification:

*“Project Developers shall perform a robust leakage assessment, and justify any steps taken to mitigate leakage. **Any material sources of leakage** identified shall be quantified or conservatively estimated and deducted in the project GHG quantification. Material sources of leakage shall be monitored and added to the project's Monitoring Plan.”*

This rule can be found in the Standard Rules, section Principles & requirements, paragraph on “Leakage”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

The threshold for all quantification cutoffs is 1%, therefore the minimum scale for leakage to be considered is 1% of the total impact.

All projects shall quantify the leakage referring to the GHG quantification requirement:

“The project system boundary shall include:

- *all processes under direct control of the project,*
- *the key upstream and downstream processes,*
- ***indirect processes, such as activity shifting, identified in the leakage assessment, and...***

Processes with the lowest contributions to impacts, which each account for less than 1% of total impacts, may be excluded from the GHG quantification, up until the cumulative excluded processes exceed:

- *2% of total induced emissions for avoidance credit calculation and*
- *2% of gross removals for removals credit calculation.”*

This rule can be found in the Standard Rules, section GHG quantification paragraph on “Project system boundary”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/ghg-quantification#project-system-boundary>

An example extract of a project leakage assessment can be found in the May-October 2025 Monitoring Report for the project Releaf - Nigeria - New biochar production unit, Project ID RIV-2024-PROJ-82, under the BiCRS

methodology:

“A leakage assessment was performed in line with Rainbow’s requirements. The primary theoretical leakage risk is whether the valorisation of palm kernel shells (PKS)—a by-product of palm-nut processing—could create an incentive for smallholders to expand oil-palm cultivation into forested land.

Based on economic analysis, historical market behaviour, structural land-tenure constraints, and the technological safeguards (SITE and SALT), the project’s leakage risk is low.

...

Prior to the project, palm kernel shells were largely unused or disposed of through burning, application as a soil cover, or minor local uses such as bedding. Given the availability of alternative materials for these purposes (e.g., wood shavings, leaves, other agricultural residues), diverting palm kernel shells to biochar production is unlikely to cause significant activity shifting or replacement, and therefore presents low leakage risk.

While none of the alternative uses of the feedstock provide permanent carbon sequestration, they each pose potential leakage risks, in addition to the emissions leakages linked to palm tree cultivation. The main leakage risks in the RELEAF project are identified and explained below:

1. Deforestation risk due to palm oil production expansion:

RELEAF sources palm nuts from existing smallholder trees and generates PKS only as a residue of nut de-shelling. Farmers do not grow palm trees for shells. They grow trees for crude palm oil (CPO) and for nut value. Shells have no farmer-level price signal capable of influencing land-use decisions.

As detailed in the sections below, financial comparison shows that PKS represents less than 1% of the economic value per hectare, whereas Crude Palm Oil (CPO) accounts for >90–95% of the value.

Additionally, large-scale deforestation is unlikely, as plantations require significant capital, a decade for returns, and extensive labor and land investment, resources that smallholders lack. Smallholders also lack maps of restricted areas, risking encroachment on high-conservation lands. RELEAF’s SITE tool and farmer engagement guide sustainable planting, combining crop purchasing with ecological planning. RELEAF is currently the only organization in Africa providing this integrated approach to support smallholder livelihoods while preventing unsustainable expansion.

2. Displacement of Other Biomass Uses:

Palm shells previously used for fuel, soil amendments, and animal bedding may be redirected to biochar production. Other residues exist locally, and alternative biomass sources are available, such as cocoa, rice, maize, and pineapple residues.

...

Conclusion

PKS accounts for less than 1% of per-hectare value, while crude palm oil—the main revenue driver—has tripled

without causing deforestation. Structural and cultural barriers limit expansion, and SITE/SALT actively excludes deforestation-linked supply. RELEAF project in Nigeria poses low leakage risk. By leveraging smallholder constraints, cultural practices, and Releaf’s SITE tools, it prevents local and indirect deforestation while providing economic benefits to rural communities. Valorizing PKS through biochar does not seem to create relevant incentives for land conversion that would lead to substantial emission leakages.”

The full document can be found in the document Monitoring Report - RELEAF, Q2-3 2025, section Updated eligibility requirements, sub-section Leakage evaluation, available at this link: <https://arc.rainbowstandard.io/document/4605df44-e5a3-440a-9854-898f7cbe9fa1> which can be accessed from the project page here: <https://registry.rainbowstandard.io/projects/RIV-2024-PROJ-82>

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

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
--	---

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 Rainbow Standard Rules requires all projects to assess, quantify, and mitigate material leakage through the following measures:

- **Leakage assessment:** Project Developers must identify and evaluate potential leakage sources during validation, using methodology-specific templates and guidance. All significant leakage risks must be documented in the Project Design Document (PDD), and if leakage impacts are more than 20% of the potential benefit then the project will be ineligible to be validated by the Rainbow standard.

“Projects shall minimize leakage, where carbon-emitting activities are geographically displaced or relocated to areas outside the project boundaries as a direct result of the project’s implementation.

*Project Developers shall **perform a robust leakage assessment, mitigate any identified leakage, and justify any steps taken to do so...***

Projects are ineligible if their quantified leakage impacts exceed:

- *20% of total induced emissions for avoidance credit calculation or*
- *20% of gross removals for removals credit calculation.”*

This can be found in the Standard Rules, section Principles & requirements, paragraph on “Leakage”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

- **Quantification:** Material sources of leakage must be quantified and included in the project’s GHG accounting. If leakage is quantified, projects must conservatively manage and disclose all material leakage.

“Any material sources of leakage identified shall be quantified or conservatively estimated and deducted in the project GHG quantification.”

This can be found in the Standard Rules, section Principles & requirements, paragraph on “Leakage”, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

- **Monitoring:** The leakage assessment is included in the PDD audited at Validation audit, and any material sources of leakage identified in the assessment are required to be monitored, ensuring ongoing mitigation:

“Material sources of leakage shall be monitored and added to the project's Monitoring Plan.”

This can be found in the Standard Rules, section Principles & requirements, paragraph on “Leakage”, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

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

N/A

Q10.b). Are procedures in place requiring and supporting activities to monitor identified leakage? (<i>Paragraph 3.6.3</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):

As stated in the Leakage section: *“Project Developers shall perform a robust leakage assessment, mitigate any identified leakage, and justify any steps taken to do so. Any material sources of leakage identified shall be quantified or conservatively estimated and deducted in the project GHG quantification. **Material sources of leakage shall be monitored and added to the project's Monitoring Plan.**”*

This can be found in the Standard Rules, section Principles & requirements, paragraph on “Leakage”, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

[ents#leakage](#)

When leakage has been identified and quantified, Rainbow requires projects to **monitor in the GHG quantification and monitoring since** “*Monitoring Plans shall include parameters that are: material to GHG quantification*”. Projects must include leakage monitoring in their Monitoring Plan, with requirements tailored to the project type and risk level. Monitoring Reports shall report that the mitigation measures established in the Reversal risk assessment are in place. This is reviewed by Rainbow and audited by the VVB at each verification Audit.

The requirements for monitoring plans can be found in the Standard Rules, section Principles and requirements, paragraph on “Monitoring”, available at:
<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#monitoring-plan>

The Monitoring Plan template can be found in the Procedural template of the Rainbow Documentation Hub, and is available at this weblink:
<https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/annual-monitoring-template>

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

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? (Paragraph 3.6.4)	<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):

Rainbow mandates that all identified material leakage must be deducted from the project’s emissions accounting if it reduces the mitigation benefits. “*Project Developers shall perform a robust leakage assessment, mitigate any identified leakage, and justify any steps taken to do so. Any material sources of leakage identified shall be quantified or conservatively **estimated and deducted in the project GHG quantification**. Material sources of leakage shall be monitored and added to the project’s Monitoring Plan.*”

This can be found in the Standard Rules, section Principles & requirements, paragraph on “Leakage”, available at:
<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

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

N/A

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 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):

N/A

As noted in TAB’s first report to Council (Oct. 2020), this Leakage guideline specifically applies to REDD+ activities as defined in the UNFCCC’s Warsaw Framework and related decisions.

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

N/A

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:

Equipment replacement projects are relevant across a multitude of sectors, including energy generation, industrial processes, and transportation, offering tangible opportunities for emissions mitigation. The following, activity types may involve equipment or system replacement as part of their baseline and be eligible for Rainbow methodologies, is available:

- Power Generation: pyrolyser, biomass boilers and anaerobic digesters (Rainbow methodologies Biomass carbon removal and storage (BiCRS) energy co-product module and Biogas from anaerobic digestion)
- Circular value chains: repurposing of batteries for energy storage, refurbishment of electronic devices (Rainbow methodologies Refurbishing of electronic devices and Battery second life)

For the activity types listed above, does the programme have procedures ensuring that (<i>select all that apply</i>): (<i>Paragraph 3.6.4</i>)	
(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 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 checked="" 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) The Rainbow Standard does not prescribe standardized procedures for ensuring and verifying the decommissioning, destruction, or scrapping of baseline equipment. Instead, Rainbow’s sector-specific

methodologies prioritize emission avoidance calculations and leakage accounting, reflecting a focus on **operational emission reductions** rather than equipment disposal.

The absence of explicit verification procedures means that the emphasis remains on baseline emission calculations and accounting for the potential continued use of displaced equipment. This approach acknowledges the complexity of standardizing disposal emission factors and verification procedures across diverse equipment types and disposal methods.

In cases where baseline equipment may be resold or remain in use, Rainbow methodologies include provisions to account for emissions from its continued operation, where the resulting emissions differ from the project scenario, ensuring robust and transparent carbon accounting. This would be considered leakage, which is included in all GHG quantification, according to the Rainbow Standard Rules:

*Any material sources of leakage identified shall be quantified or conservatively **estimated and deducted in the project GHG quantification**. Material sources of leakage shall be monitored and added to the project's Monitoring Plan."*

This can be found in the Standard Rules, section Principles & requirements, paragraph on "Leakage", available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

The specific implementation of this requirement can be seen in the Refurbishing of electronic devices methodology:

"A conservative and representative baseline is ensured by accounting for two main factors in the substitutability of refurbished devices for new devices:

- *Device quality: Project developers must demonstrate refurbished project devices are appropriate substitutes for newly manufactured devices, ensuring that the baseline remains representative of the project scenario. To do so, the developer must provide evidence of the quality of refurbished devices, confirming that they meet the standards required to serve as valid replacements for new products. Acceptable evidence may include documentation of quality control procedures, the device grading system, and the quality thresholds that devices must meet to be sold rather than recycled.*
 - *Devices sold by the project that are not fully functional shall not be considered as substitutes for new devices, and therefore will not be counted towards avoided emissions from new device production. The avoided emissions from e-waste treatment are still counted.*
- *Device lifetime: Refurbished devices are assumed to have shorter lifetimes than new devices. This difference in performance is acceptable because it is accounted for in the GHG reduction calculations to calculate the number of RCCs to issue a project (see Equation 19 in the section New device production)."*

The full text can be found in the Refurbishing of electronic devices methodology, section on GHG quantification, sub-section Baseline scope, at this link: <https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/eligible-technologies#baseline-scope>

- b) When relevant and in scope, the emissions for the end-of-life are taken into account (see question Q13.c) and the recycling processes are mandatory.

The Standard Rules require that methodologies:

*“For activities that physically replace or decommission baseline equipment, methodologies shall outline requirements to quantify any leakage emissions from disposal and continued use of baseline equipment outside the project boundary (unless under the GHG quantification cutoff). **Methodologies may require such baseline equipment to be destroyed, decommissioned, or otherwise phased out.**”*

This can be found in the Standard Rules, section Principles & requirements, paragraph on “Leakage”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#leakage>

For the avoidance of doubt, none of the sectors mentioned above involve replacing equipment or other physical systems that are deemed harmful and are required to be phased out under the applicable methodologies.

- c) Yes, emissions from disposal (e.g., end-of-life treatment of electronic devices or batteries) are assessed, mitigated, and deducted from the project’s verified results.

- i) Battery Second Life Methodology, “Battery waste treatment”:
<https://docs.rainbowstandard.io/methodologies/battery-second-life/ghg-quantification#battery-waste-treatment-project>

“Battery waste treatment (project)

Battery packs and/or parts collected by the project that cannot be successfully prepared for reuse are processed through recycling.

Battery second life projects typically partner with certified recycling companies that are equipped to handle hazardous materials. These companies must be capable of managing BU, BMS and auxiliary components

Project Developers shall provide the percent of collected BUs, BMS, and ACs that are recycled.

Battery recycling is modeled using either hydrometallurgical or pyrometallurgical treatment depending on the battery chemistry (seeecoinvent processes in Appendix 1).”

- ii) Refurbishing of electronic devices, “E-waste treatment of non-refurbished devices”: <https://docs.rainbowstandard.io/methodologies/refurbishing-of-electronic-devices/ghg-reduction-quantification#civ1j3sjdull>:

“E-waste treatment of non-refurbished devices

Devices collected by the project that cannot be refurbished undergo e-waste recycling. Refurbishing projects typically have contracts with e-waste recycling companies that collect and recycle such devices.

Project Developers shall provide the fraction of devices that are recycled, and they will be modeled as mechanical e-waste recycling with shredding and separation (see ecoinvent processes in Appendix 1).

Some non-refurbished devices may be kept onsite to harvest spare parts in the future, but due to limited project data on this topic, they are assumed to be recycled.

Devices that are sold by the project in a non-functional state shall be treated in the calculations as recycled devices.”

When baseline equipment remains in use (e.g., charcoal production, BAU construction materials), their emissions are addressed through conservative leakage assessment and market-level substitution rates, ensuring all residual emissions are accounted for and deducted.

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

N/A

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?(Paragraph 3.7.1 and 3.7.5)	<input checked="" type="checkbox"/> YES
b) ...to ensure that only one unit is issued for one tonne of mitigation? (Paragraph 3.7.1 and 3.7.5)	<input checked="" type="checkbox"/> YES
c) ...to ensure that one unit is issued or transferred to, or owned or cancelled by, only one entity at any given time? (Paragraphs 3.7.2 and 3.7.6)	<input checked="" type="checkbox"/> 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? (Paragraph 3.7.7)	<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) Rainbow and Rainbow Registry doesn't allow for transfer or units to another registry.

"Rainbow does not allow any transfer of RCCs outside of the Rainbow registry."

This can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph on "Transfers", available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#transfers>

For the avoidance of doubt:

- i) The requirement for project moving to Rainbow can be found in the Standard Rules, section Principles and requirements, paragraph "Double issuance", available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#double-issuance>

"If a project transfers from another crediting program to the Rainbow registry, the monitoring period shall not overlap. The Project Developer shall provide the deregistration certificate from the other carbon-crediting program, stating from which date the project's activity is no longer credited under the other carbon-crediting program, and the end date of the last monitoring period."

- ii) The requirement for project moving from Rainbow can be found in the Procedures Manual, section Project certification, paragraph "Deregistration": <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/project-certification-procedure#deregistration>

And states that: *"The Project Developer shall choose how to manage any credits that were issued but not transferred, sold, or retired on the Rainbow registry. They may choose between:*

- *keeping those credits available on the Rainbow registry, or*
- *canceling those credits on the Rainbow registry, e.g. to convert and re-issue them by the other GHG program on its registry."*

- b) Each Rainbow Carbon Credit (RCC) represents one tonne of CO₂e avoided or removed, as verified by accredited VVBs. The General principles and requirements for GHG quantification available at <https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/ghg-quantification#general-principles-and-requirements> states that: *"One RCC is issued per one tonne of CO₂ equivalent avoided or removed by the project, compared to the baseline."*

The Rainbow Registry assigns a unique identification number to each RCC, preventing duplicate issuance for the same mitigation activity. The requirement for unique identifier can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph "Credit serial numbers" and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#credit-serial-numbers>

Furthermore *"GHG emissions shall be calculated by default using the following IPCC Global Warming*

Potential values for a 100 year horizon (GWP100) according to IPCC 2021 AR6, Chapter 7.” Alternative GWP100 values from other IPCC versions may be used by projects in order to comply with host countries NDC and regulations.

The guidance for GWP can be found in the Standard Rules, section on GHG quantification, paragraph “Global Warming Potential” and is available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/ghg-quantification#global-warming-potentials>

- c) The Rainbow Registry tracks the full lifecycle of each RCC, from issuance to retirement, ensuring exclusive ownership and preventing simultaneous claims. For example, *“The Rainbow Registry identifies and tracks the following:*
- *RCC status according to the definitions outlined below*
 - *RCC ownership/holding, from issuance to cancellation/retirement.”*

This shows that an RCC can only be owned by 1 entity at a time:

*“All **events** (issuance, transfer, retirement, cancellation) shall be recorded on the registry, including the following details:*

- **Transaction ID:** *unique identification of the transaction*
- **Completed at:** *date of the event*
- **From:** *organization initial owner of the units*
- **To:** *new organization owner of the units*
- **Credit serial numbers**
- **Amount of credits**

All events are made public and shall allow for tracking history of ownership of the units.”

This can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph on “RCC status”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#rcc-status>

For example from a retirement, one can find the intermediary owners:

74 credits retired by Cloverly on behalf of Wascosa Group Holding S.A.R.L..

Retirement

Change of ownership



<p>General information</p> <p>Retired by Cloverly</p> <p>On behalf of Wascosa Group Holding S.A.R.L..</p> <p>Reason CO2 Compensation for 2025</p> <p>Certificate Download</p>	<p>Transaction details</p> <p>Amount 74 tCO₂eq</p> <p>Completed at 24/02/2026</p> <p>Transaction ID 6fe0163f-d343-4779-af64-4d3b773209a0</p>	<p>Credits details</p> <p>Mechanism Removal</p> <p>Credit IDs RIV-FR-14-RMV-2024-637e6/25:98</p> <p>Vintage year 2024</p>
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Link to screenshot:

<https://registry.rainbowstandard.io/ledger/transactions/6fe0163f-d343-4779-af64-4d3b773209a0>

One can click on "Transfer" to access the transfer event page and access the "General information: From/to"

74 credits transfered to Cloverly

Transfer



<p>General information</p> <p>From Manufacture Bois Paille</p> <p>To Cloverly</p>	<p>Transaction details</p> <p>Amount 74 tCO₂eq</p> <p>Completed at 24/02/2026</p> <p>Transaction ID a71ab11e-65fd-40ad-968d-197da118b8ff</p>	<p>Credits details</p> <p>Mechanism Removal</p> <p>Credit IDs RIV-FR-14-RMV-2024-637e6/25:98</p> <p>Vintage year 2024</p>
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Link to screenshot:

<https://registry.rainbowstandard.io/ledger/transactions/a71ab11e-65fd-40ad-968d-197da118b8ff>

Furthermore, an immutable certificate is generated upon retirement, publicly recording the transaction and preventing reuse. As stated "Once RCCs are retired, any event type linked to them shall be

prohibited.”

The retirement procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Retirements”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#retirements>

- d) The Rainbow Registry’s unique serial numbering and public ledger prevent double-selling. Furthermore, Rainbow Registry offers to manage transaction and settlement for Account Holder ensuring all transactions are digitally tracked and preventing double-selling, this can be found in section 8 of the Terms and conditions.

The Terms of use can be found in the Rainbow Documentation Hub, in User Terms and Guidelines, available at this weblink:

<https://docs.rainbowstandard.io/other/terms-and-contracts/terms-and-conditions-for-registry-users>

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

Relevant update for d)

Rainbow is revising the Terms of Use of the Rainbow Registry so that Section 6.5 states that:

“The Account Holder undertakes to remain the sole legal and beneficial owner of any Rainbow Carbon Credit acquired through the Rainbow Registry until such credit is retired within the Rainbow Registry.

The Account Holder shall not resell or transfer Rainbow Carbon Credits to third parties outside the Rainbow Registry.”

The Terms are currently in consultation period, which is 45 days in length, will officially close on March 30, 2026, subsequent to the notification of customers.

During the consultation period, the new terms and conditions can be found at:

<https://docs.rainbowstandard.io/~ /changes/231/other/terms-and-contracts/terms-and-conditions-for-registry-users>

After March 30th, they will be accessible in the Rainbow Documentation Hub in User terms and guidelines:

<https://docs.rainbowstandard.io/other/terms-and-contracts/terms-and-conditions-for-registry-users>

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? (<i>Paragraph 3.7.10.1</i>)	<input checked="" type="checkbox"/> YES
b) ...that provide for the use of any other method(s) to avoid double-claiming? (<i>Paragraph 3.7.10.2</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) Rainbow requires a Letter of Authorization (LoA) from the host country, explicitly confirming that CORSIA-eligible units will not be counted toward the host country's Nationally Determined Contribution (NDC). *"To ensure that credits are not counted toward both a Host Country's NDCs and CORSIA compliance, Project Developers shall obtain explicit authorization from the Host Country, in the form of a Letter of Authorization (LoA). This shall be issued by an authorized representative of the Host Country's national focal point, and completed using the UNFCCC template or country's own template or Rainbow's template Letter of Authorization for CORSIA."*

The requirements for operators under CORSIA can be found under the Procedures Manual, section CORSIA and Article 6, paragraph "CORSIA eligibility procedure" available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#corsia-eligibility-procedure>

The host country must apply a Corresponding Adjustment (CA) to its national GHG inventory when RCCs are transferred as Internationally Transferred Mitigation Outcomes (ITMOs) or used for CORSIA compliance. To ensure this *"Rainbow will review each Host Country's biennial transparency report under Article 13 of the Paris Agreement to verify that required Corresponding Adjustments have been applied.*

If the Host Country has applied the CA, Rainbow will identify the affected credits (e.g., by unique batch identifiers) and publish evidence of the Adjustment on the Rainbow Registry."

This scrutiny and reporting procedure can be found in the Procedures Manual, section CORSIA and Article 6, paragraph "Review of Host Country Adjustments", publicly available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#review-of-host-country-adjustments>

- b) Rainbow ensures the prevention of double-counting through the Rainbow Standard Rules double-counting requirements . For example:

"Double claiming with other GHG-related environmental credit frameworks is not allowed. This is prevented by the signing of the Rainbow MRV & Registry Terms & Conditions, where all Project Developers agree to follow the requirements outlined in the present document.

For double claiming between entities retiring carbon credits, and the end-users of products that have been issued carbon credits, guidance from reporting schemes, GHG Protocol, and other accounting mechanisms shall be followed.

For purposes of voluntary climate pledges and reporting (e.g. GHG protocol), Project Developers must inform upstream and downstream supply chain entities of claimed project/intervention/insetting

emission reductions, report them to Rainbow, document any transfer of emission reduction units, and seek guidance in cases of conflicting claims from reporting bodies like the GHG Protocol.”

This can be found in the Standard Rules, section Principles and requirement, paragraph “Double claiming”, available at:

<https://docs.rainbowstandard.io/rainbow-standard-documents/rainbow-standard-rules/principles-and-requirements#double-claiming>

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

N/A

Q3. Does the Programme have procedures in place for the following: (<i>Paragraph 3.7.8</i>)	
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 checked="" type="checkbox"/> YES
b) for host country attestations to be obtained and <u>made publicly available prior to the use of</u> units from the host country in the CORSIA?	<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) Rainbow requires Project Developers to obtain a Letter of Authorization (LoA) from the host country’s national focal point or designated authority. As stated, *“To ensure that credits are not counted toward both a Host Country’s NDCs and CORSIA compliance, Project Developers shall obtain explicit authorization from the Host Country, in the form of a Letter of Authorization (LoA). This shall be issued by an authorized representative of the Host Country’s national focal point, and completed using the UNFCCC template or country’s own template or Rainbow’s template Letter of Authorization for CORSIA.”* The LoA must confirm authorization for CORSIA use, specify the project details, and commit to a Corresponding Adjustment (CA).

Rainbow provides a template and supports Project Developers in identifying the correct national point of contact.

This can be found in the Procedures Manual, section CORSIA and Article 6, paragraph “CORSIA eligibility procedure”, publicly available at this weblink:

<https://docs.rainbowstandard.io/~ /changes/227/rainbow-standard-documents/procedures-manual/corsia-and-article-6#letter-of-authorization>

- b) The LoA must be submitted to Rainbow before RCCs are labeled as “CORSIA-eligible.” All approved LoAs are published on the Rainbow Registry alongside project documentation, ensuring transparency and public access.

“The Letter of Authorization, reconciliation mechanism, and insurance policy shall be evaluated by the Rainbow to assess completeness and compliance with the present requirements.”

Once Rainbow has reviewed the requirements and approved, and the Letter of Approval (LoA) is publicly made available on the Rainbow Registry, the units shall be labeled as CORSIA-eligible.”

This can be found in the Procedures Manual, section CORSIA and Article 6, paragraph “CORSIA eligibility procedure”, publicly available at this weblink:

<https://docs.rainbowstandard.io/~/changes/227/rainbow-standard-documents/procedures-manual/corsia-and-article-6#corsia-approval>

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

N/A

Q4. Does the Programme have procedures in place in place to guide the contents of host-country attestations? (<i>Paragraph 3.7.9</i>)	<input checked="" 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 checked="" type="checkbox"/> YES
(ii) authorized unit vintages,	<input checked="" type="checkbox"/> YES
(iii) authorized activity types, if applicable,	<input checked="" type="checkbox"/> YES
(iv) the CORSIA compliance period for which the units are authorized,	<input checked="" 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 checked="" 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 checked="" 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):

Rainbow provides detailed requirements and a template to guide the contents of host country attestations (Letters of Authorization). *“The Letter of Authorization must include the following information:*

- (i) *The official name of the Host Country and the name and title of its authorized representative*
- *The date the authorization is issued.*
- (iii) *The name, details, and project code of the project covered by the authorization.*
- (ii) *The sector, activity type, and crediting period for which the authorization applies (or vintage).*
- *Explicit confirmation that the host country authorizes the use of the specified credits for CORSIA or Article 6.*
- (iv) *Any limits on the number of credits permitted for CORSIA (e.g. CORSIA compliance period) or Article 6 use and any applicable time restrictions.*
- *A formal declaration that the host country will not count the mitigation outcome toward its Nationally Determined Contribution (NDC)*
- (v) *A definition of “first transfer,” specifying when a Corresponding Adjustment will be applied, this may*

be at the time of authorization, issuance, or use/cancellation of the mitigation outcome

- *A statement confirming that a Corresponding Adjustment will be made in accordance with the Paris Agreement to account for the use under CORSIA or Article 6.*
- *(vi) A commitment to demonstrate that Corresponding Adjustments have been completed and reported in the country’s biennial transparency reports, as required by the Annex to decision 18/CMA.1 and consistent with decisions in 2/CMA.3, as well as any relevant future decisions by the CMA.*
- *An assurance that the host country will transparently report on granted authorizations and the use of carbon dioxide avoidance/removals for CORSIA or Article 6 in its biennial transparency reports under Article 13 of the Paris Agreement or in subsequent reports as required by future CMA decisions.”*

This can be found in the Procedures Manual, section CORSIA and Article 6, paragraph “Letter of Authorisation”, publicly available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#information-to-include-in-the-loa>

The template letter for authorization for CORSIA can be found in the Documentation Hub, under Procedural templates and is available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/letter-of-authorization-for-corsia>

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

N/A

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 checked="" 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 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) Rainbow ensures that host country attestations (Letters of Authorization) for CORSIA-eligible units, must explicitly confirm the use of Corresponding Adjustments (CAs) for CORSIA-eligible units, including dates and definition of first transfer. As taken from the LoA template:
*“We authorize only the use of the project’s GHG emission avoidance/removals, for which Rainbow Standard has issued or will issue Rainbow Carbon Credits (RCCs), that occur in the period from [DATE] to [DATE];
 We authorize only the use of a maximum of [#] tCO2e of the project’s GHG emission reductions/removals, issued as RCCs by Rainbow Standard, for each calendar year;
 We authorize the use of the GHG emission reductions and/or removals only for [CORSIA compliance period].*

We acknowledge our definition of “first transfer” in terms of when we will apply a Corresponding Adjustment for other international mitigation purposes upon [SPECIFY ONE OF THE FOLLOWING: 1) authorisation, 2) issuance or 3) the use or cancellation of the mitigation outcome, as specified by the participating Party]. The template letter for authorization for CORSIA can be found in the Documentation Hub, under Procedural templates and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/letter-of-authorization-for-corsia>

- b) Rainbow reviews all LoAs to ensure that the LoA includes a **formal declaration** that the host country will not count the mitigation outcomes toward its NDC. It must specify the **timing of the CA** (e.g., at authorization, issuance, or retirement) and commit to transparent reporting in biennial transparency reports under Article 13 of the Paris Agreement. The LoA must describe the host country’s process for monitoring and reporting CAs, ensuring alignment with ICAO and UNFCCC requirements.

“We hereby confirm that a Corresponding Adjustment will be made in full accordance with the Paris Agreement to account for the use of the project’s GHG emission reductions or removals under CORSIA within [the expected timing and processes for applying and reporting adjustments]. We commit to demonstrating that all Corresponding Adjustments have been completed and reported in [Country]’s biennial transparency reports, as required by the Annex to decision 18/CMA.1 and consistent with decisions in 2/CMA.3, as well as any relevant future decisions by the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA).”

The template letter for authorization for CORSIA can be found in the Documentation Hub, under Procedural templates and is available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedural-templates/letter-of-authorization-for-corsia>

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

N/A

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):

Rainbow will enforce a monitoring of Corresponding Adjustments to ensure claims are properly reported and support Project Developers in the implementation of the established reconciliation process. As such *“Project Developers are responsible for continuously monitoring Host Country reporting and submitting accurate, timely information to Rainbow. Rainbow will verify submissions from Project Developers, and conduct independent annual checks of Host Country GHG reporting and completed CAs.*

If, three months after the expected declaration and execution of the CA, the Host Country has not provided evidence of the required CA, Rainbow will oversee the carrying out of the compensation for any double-claimed

units using the established reconciliation mechanism.”

This can be found in the Procedures Manual, section CORSIA and Article 6, paragraph “Letter of Authorisation”, publicly available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#corsia-double-claiming-reconciliation-procedures>

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

N/A

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? (<i>Paragraph 3.7.11</i>)	<input checked="" type="checkbox"/> YES
b) update information pertaining to host country attestation as often as necessary to avoid double-claiming? (<i>Paragraph 3.7.11</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) All Letters of Authorization (LoA) and related national government decisions are published on the Rainbow Registry alongside project documentation as stated in Procedures Manual, section CORSIA and Article 6: “Rainbow shall make publicly available all LoAs that have been approved on the Rainbow Registry.” This is available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#letter-of-authorization-2>

On Rainbow Registry’s project page access is possible by clicking on the “Documentation” tab:

The screenshot shows a website interface with a navigation menu including 'Story', 'Carbon Credit Volumes', 'Cobenefits', 'Infographics', and 'Documentation'. A callout box titled 'Access to project documentation' points to the 'Documentation' menu item. Below the navigation is a banner image with text: 'cover the cost of the pyrolysis unit. → Feedstock has to come from sustainable biomass waste sources. → Farmers need to be educated about biochar as an agricultural fertilizer, and biochar needs to meet strict regulatory requirements when used in construction.' To the right of the banner is a circular graphic stating '70% of an average biochar project financing relies on carbon credit sales.⁽⁴⁾'. Below the banner is a table titled 'Project Documentation'.

Document	Period	Published	Links
Project Design Document (PDD)		Aug 25, 2025	Open document
Monitoring & Verification Audit Report	Oct/2023 to Dec/2023	Aug 28, 2025	Open document
Monitoring & Verification Audit Report	Jan/2024 to Dec/2024	Aug 28, 2025	Open document
Monitoring & Verification Audit Report	Jan/2025 to Apr/2025	Aug 28, 2025	Open document
Validation Audit Report		Aug 28, 2025	Open document

b) When Host Country updates their authorization, “Project Developers must inform Rainbow of any changes they become aware of to the Host Country authorization.”

Furthermore, as stated in the CORSIA double claiming reconciliation procedures, “Project Developers are responsible for continuously monitoring Host Country reporting and submitting accurate, timely information to Rainbow. Rainbow will verify submissions from Project Developers, and conduct independent annual checks of Host Country GHG reporting and completed CAs.

If, three months after the expected declaration and execution of the CA, the Host Country has not provided evidence of the required CA, Rainbow will oversee the carrying out of the compensation for any double-claimed units using the established reconciliation mechanism.”

These procedures can be found in the Procedures Manual, section CORSIA and Article 6, in:

- Paragraph “Procedure for updates to Host Country authorization”, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#procedure-for-updates-to-host-country-authorization>
- Paragraph “CORSIA double claiming reconciliation procedures”, available at: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#corsia-double-claiming-reconciliation-procedures>

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

N/A

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? (<i>Paragraph 3.7.12</i>)	<input checked="" type="checkbox"/> YES
Q8.b). Do the procedures referred to above... (<i>Paragraph 3.2.12</i>)	
(i) ...specify the relevant accounting information in each report submitted in accordance with Section IV of Annex I to Decision 2/CMA.3?	<input checked="" 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 checked="" type="checkbox"/> YES
iii) ...require publication of all host-country attestations and related documentation generated by the emissions unit programme (e.g., results from the comparison)?	<input checked="" 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):

- a) Rainbow actively compares host countries’ national emissions reports (e.g., biennial transparency reports under Article 13 of the Paris Agreement) with the volumes of CORSIA-eligible units issued and attested in Letters of Authorization (LoA). This ensures that Corresponding Adjustments (CAs) are applied as committed and that no double-claiming occurs.

Rainbow’s CORSIA Annual Oversight Report will include detailed information on CORSIA-eligible units, Corresponding Adjustments, and host country attestations, submitted to ICAO and UNFCCC. And “Rainbow will publish every year a CORSIA Annual Oversight Report including detailed information on CORSIA-eligible emissions units, covering:

- *Quantity and serial numbers of credits authorized by Host Countries for CORSIA, broken down by country, vintage, and calendar year.*
- *Quantity of CORSIA-eligible credits retired by airline operators for each CORSIA compliance period.*
- *Corresponding Adjustments confirmed for Rainbow-authorized credits.*
- *Quantity of CORSIA-eligible credits that are active, retired, or canceled, including their serial numbers.*
- *Quantity of CORSIA-eligible credits identified as double-claimed and subsequently compensated by Rainbow, including both quantity and serial numbers.”*

The report will be made publicly available on the Administrative Oversight Record (available at this weblink: <https://docs.rainbowstandard.io/other/administrative-oversight>). This is outlined in the Procedures Manual, section CORSIA and Article 6, paragraph “Notification of relevant bodies”, available

at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#notification-of-relevant-bodies>

b) Yes the procedures referred to above (i), (ii),

“The monitoring of the national emissions reports shall ensure consistency with the provided LoA with the specified information in the LoA, including notably:

- i) *the relevant accounting (in accordance with Section IV of Annex I to Decision 2/CMA.3*
- ii) *and expected timing of the CAs.”*

This is outlined in the Procedures Manual, section CORSIA and Article 6, paragraph “Reporting”, available at this weblink:

<https://docs.rainbowstandard.io/~ /changes/227/rainbow-standard-documents/procedures-manual/corsia-and-article-6#reporting>

And (iii), *“Rainbow will publish the consolidated information in the CORSIA Annual Oversight Report which shall report:*

- *“Quantity and serial numbers of credits authorized by Host Countries for CORSIA, broken down by country, vintage, and calendar year.*
- *Quantity of CORSIA-eligible credits retired by airline operators for each CORSIA compliance period.*
- *Corresponding Adjustments confirmed for Rainbow-authorized credits.”*

The report will be sent to ICAO.

This is outlined in the Procedures Manual, section CORSIA and Article 6, paragraph “Notification of relevant bodies”, available at this weblink:

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#notification-of-relevant-bodies>

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

N/A

<p>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>)</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):

Yes, Rainbow is willing and able to report to ICAO, upon request, on:

- Material instances of double-claiming and the programme’s responses (e.g., compensation, revocation of eligibility).
- Changes to host country attestations, including updates to the number, scale, or scope of authorizations.
- Revisions to programme measures related to CORSIA eligibility, double-claiming prevention, or Corresponding Adjustments.

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

N/A

<p>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>)</p>	<p><input checked="" type="checkbox"/> YES</p>
--	--

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):

Rainbow has robust procedures to compensate for, replace, or reconcile double-claimed mitigation under CORSIA:

- Reconciliation mechanism: *“Project Developers shall establish a reconciliation mechanism to resolve any disputes between them and the host country concerning the **revocation of a Corresponding Adjustment (CA)**. This mechanism shall ensure that all parties have a clear, transparent and mutually agreed-upon process for addressing and resolving disagreements.”*
- Insurance:
 - *“Project Developers shall secure double-claiming insurance coverage from a provider approved by Rainbow. The insurance policy must ensure that, in the event of double claiming:

 - *The insurer replaces an equivalent volume of the affected units authorized with CORSIA-eligible units; or*
 - *The insurer provides financial compensation sufficient to procure an equivalent volume of eligible units, such as CORSIA-eligible RCCs or other recognized units.”**
- In the event of double-claiming, Rainbow will oversee the reconciliation procedure going through the following steps:
 - *“Notification: Rainbow will notify the Project Developer within 48 hours of confirming a double-claiming event.*
 - *Compensation: Upon notification, the Project Developer shall deploy the defined compensation mechanism.*
 - *Revoke CORSIA eligibility: Rainbow shall revoke the CORSIA-eligible label for the affected credits until the double-claimed event is investigated and resolved. The project should re-obtain eligibility under CORSIA following CORSIA eligibility procedure.”*

The requirement for reconciliation mechanism and insurance can be found in the Procedures Manual, section CORSIA and Article 6, paragraph "CORSIA eligibility procedure", available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#reconciliation-mechanism>

The procedure for reconciliation in case of double-claiming can be found in the Procedures Manual, section CORSIA and Article 6, paragraph "CORSIA double claiming reconciliation procedures", available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/corsia-and-article-6#corsia-double-claiming-reconciliation-procedures>

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

N/A

PART 6: Programme comments

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

A) General comments

Rainbow operates a carbon-crediting programme governed by the requirements and processes defined in the Rainbow Standard Rules. General information about Rainbow is available at rainbowstandard.io. All programme documentation is publicly accessible at docs.rainbowstandard.io.

Version 7 (V7) of the Rainbow Standard Rules was released on January 16, 2026, incorporating updates to align with the Integrity Council for the Voluntary Carbon Market (IC-VCM) and the Core Carbon Principles (CCP) requirements. As of March 05, 2026, V7 of the Rainbow Standard Rules is CCP-eligible: <https://icvcm.org/integrity-council-confirms-carbon-crediting-program-rainbow-as-ccp-eligible/>

Rainbow maintains a public registry at registry.rainbowstandard.io, which ensures full transparency over the lifecycle of Rainbow Carbon Credits (RCCs). The registry provides access to project information, validation and verification reports, impact assessments, and data on the issuance, transfer, and retirement of all RCCs, including the current status of each unit (issued, verified, retired, or canceled).

Rainbow informs the Technical Advisory Board (TAB) that, in 2025, Reverse SAS underwent a rebranding, which included the transition of its crediting programme from the Reverse Standard to the Rainbow Standard. Previous applications, such as those submitted under CORSIA, were formulated under the name Reverse (and the Reverse Standard).

B) French airline decree

In 2026, aircraft operators may procure Rainbow Carbon Credits to fulfill obligations under France's mandatory offsetting regime for airlines, as defined by Articles L229-55 and R229-102 of the French Environmental Code. The 2025 compensation reports, due by 30 April 2026, will reflect these transactions. Rainbow will promptly update TAB upon receiving formal approval of these credits from the competent French authorities.

For reference:

- Link to Article L229-55: https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000043966440
- Link to Article R229-102-1: https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000045670859

C) Registry partnership research disclosure:

Rainbow informs TAB that Rainbow has entered into advanced discussions with the [Global Carbon Market Utility](#)

(GCMU) to explore a collaboration aimed at enhancing flexibility and robustness for project developers. The objective of this collaboration is to enable project developers to choose an alternative registry provider, should they wish to do so, while ensuring the integrity, bankability and longevity of carbon assets.

The proposed collaboration seeks to integrate the GCMU Registry as a legal and operational foundation for compliance markets as well as commodity markets. This initiative is designed to provide project developers with greater choice and confidence in registry services, leveraging GCMU's extensive experience in commodity markets to ensure the integrity and sustainability of carbon assets.

To achieve this objective, Rainbow and GCMU are actively engaging in the following workstreams: alignment on registry requirements, legal and commercial alignment, stakeholder engagement and technical due diligence and integration. For more information, an additional Appendix D on the proposed collaboration arrangement, including protections against double counting.

This collaboration is intended to support Rainbow integration to the regulated uses of its carbon credits (for example CORSIA, Article 6) by providing a robust, flexible, and bankable framework for carbon credit registration and management. Rainbow will keep TAB informed as these discussions progress and are open to provide further details upon request.

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:

Clément GEORGET

09/03/2026

Full name of Programme Representative (*Print*)

Date signed (*Print*)

DocuSigned by:

Clément GEORGET

25742A0896814AB...

Programme Representative (*Signature*)

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



ICAO

Programme Application Form, Appendix B

Programme Assessment Scope

CONTENTS: With this document, programmes define which of their activities they are submitting for assessment by the TAB. The two sheets are described below:

Sheet A) Activities the programme describes in this form, which will be assessed by ICAO's TAB

Sheet B) List of all methodologies / protocols that support activities described under Sheet A

SHEET B: METHODOLOGIES / PROTOCOLS LIST (Here, list all methodologies / protocols that support activities described in Sheet A)

Methodology name	Unique Methodology / Protocol Identifier	Applicable methodology version(s)	Date of entry into force of most recent version	Prior versions of the methodology that are credited by the Programme (if applicable)	Greenhouse / other gases addressed in methodology	Web link to methodology
e.g. "Methodology to XYZ..."	e.g., ABC-123-V20-XXX	e.g., V2.0	1/1/2018			
Mineralization of alkaline materials (ex situ)	RBW-CDR-MIN-V1.0	V1.0	9/10/2025	N/A	CO2, CH4, N2O, HFCs, PFCs, SF6, NF3	https://docs.rainbowstandard.io/methodologies/mineralization-of-alkaline-materials-ex-situ
Enhanced rock weathering	RBW-ERW-V1.0	V1.0	10/17/2025	N/A	CO2, CH4, N2O, HFCs, PFCs, SF6, NF3	https://docs.rainbowstandard.io/methodologies/enhanced-rock-weathering
Biomass carbon removal and storage (BiCRS)	RBW-BICRS-GEN-V1.1	V1.1	1/10/2026	V1.0	CO2, CH4, N2O, HFCs, PFCs, SF6, NF3	https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs
Biochar application to soils	RBW-BICRS-CS-BCSOIL-V2.3		1/21/2026	V2.2	CO2, CH4, N2O, HFCs, PFCs, SF6, NF3	https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-storage/biochar-application-to-soils
Biomass feedstock	RBW-BICRS-CC-BMF-V1.1	V1.1	1/21/2026	V1.0	CO2, CH4, N2O, HFCs, PFCs, SF6, NF3	https://docs.rainbowstandard.io/methodologies/biomass-carbon-removal-and-storage-bicrs/carbon-capture/biomass-feedstock
Biogas from anaerobic digestion	RBW-ENGY-01-ADGAS-V3	V3.2	6/20/2025	V2.1, V2.2, V2.3, V3.0	CO2, CH4, N2O, HFCs, PFCs, SF6, NF3	https://docs.rainbowstandard.io/methodologies/biogas-from-anaerobic-digestion



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

SHEET A: EXCLUDED ACTIVITIES (Here, list activities supported by the programme that the programme wishes to **exclude** from TAB's assessment, whether or not these were previously excluded from the programme's Scope of Eligibility for the 2024-2026 compliance period)

Sector	Project/programme type(s)	Implementation level(s)	Geography(ies)
e.g. Waste, Energy	e.g., Landfill methane capture; Coal mine methane capture	e.g., Project-level only; Programmes of activities; Sector-	e.g., Global; Non-Annex I-only; Country X only
Biomass with Carbon Removal and Storage (BiCRS)	Marine sub-sediment burial	Project-level	Global
Construction	Biobased construction materials	Project-level	Global

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.

DocuSigned by:
Clément GEORGET
25742A0896814AB...

Programme Representative Signature
Clément GEORGET

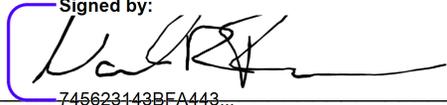
Programme Representative Name

Rainbow

Programme Name

09/03/2026

Date

Signed by:

745623143BFA443...

Registry Representative Signature
Nathaniel Downs

Registry Representative Name

Rainbow Registry

Registry Name

09/03/2026

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 7.11 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: [Rainbow](#)

Administering Organization⁵: [Riverse SAS](#)

Official mailing address: [28 Avenue des Pépinières, 94260 Fresnes, France / hello@rainbowstandard.io](#)

Telephone #: -

Official web address: <https://rainbowstandard.io/>

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

Full name and title: [Clément Georget](#)

Employer / Company (*if not programme*): -

E-mail address: clement@rainbowstandard.io

Telephone #: [+33 6 82 05 40 91](#)

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

Full name and title: [Click or tap here to enter text.](#)

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

⁵ Name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme, *if different from "Programme Name"*.

Employer / Company (*if not Programme*): [Click or tap here to enter text.](#)

E-mail address: [Click or tap here to enter text.](#)

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

2. Registry Representative Information⁶

A. Registry Information

Registry / system name: [Rainbow Registry](#)

Administering Organization: [Riverse SAS](#)

Official mailing address: [28 Avenue des Pépinières, 94260 Fresnes, France](#)

Telephone #: -

Official web address: <https://registry.rainbowstandard.io/>

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

Full name and title: [Nathan Downs, Tech Lead](#)

Employer / Company (*if not Registry Administering Organization*): -

E-mail address: nathan@rainbowstandard.io

Telephone #: -

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

Full name and title: [Clément Georget, General Manager](#)

Employer / Company (*if not Registry Administering Organization*): [Riverse SAS](#)

E-mail address: clement@rainbowstandard.io

Telephone #: -

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	<p>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 applicable⁷, 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>”?</p>	<input checked="" type="checkbox"/> YES
	<p>Describe how the Registry ensures its ability to implement these provisions:</p>	
	<p>The Rainbow Registry meets the objectives of all provisions and procedures provided to the relevant authorities in the Application Form. It exclusively lists units verified to the Rainbow Standard and underlying methodologies, with each unit attached to a unique serial number and representing one metric ton of carbon dioxide avoided or removed from the atmosphere with the relevant durability and labels.</p> <p>The Rainbow Registry is managed internally by designated Rainbow staff and is subject to robust security measures, as detailed in the Rainbow Procedures Manual, section on Registry requirements available at this weblink: https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements</p> <p>The Rainbow Registry complies with the requirements of section Rainbow Carbon Credits of the Rainbow Procedures Manual, which sets out the rules governing accurate tracking of the full life-cycle of each unit, including Issuance, Transfer, Cancellation and Retirement. Furthermore, the Rainbow Registry has the ability to specifically label CORSIA-eligible emissions units, thereby allowing retirees to use units for the purposes of ICAO compliance.</p> <p>These procedures can be found at this weblink: https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits</p>	
	<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>.</p>	
	<p>The full public functionality of the Rainbow Registry is directly accessible at https://registry.rainbowstandard.io/, where the functionality and practices outlined in this application can be reviewed.</p>	

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.

7.2	<p>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?</p>	<input checked="" type="checkbox"/> YES
	<p>Describe how the Registry does or will implement this provision:</p>	
	<p>To open a Rainbow Registry Account (see Account creation procedure), applicants must first complete the relevant documentation as follows:</p> <ul style="list-style-type: none"> • Creation account request through the form available on Rainbow website (https://rainbowstandard.io/get-started) via email at hello@rainbowstandard.io • All account holders must agree to the Rainbow Terms of Use. • Additionally Project Developers must sign the General Terms of Arc Platform (Rainbow’s Certification platform) <p>Only Organizations (not individuals) are eligible for a Registry Account.</p> <p>Additionally, any prospective Account Holder must first undergo Rainbow’s Know Your Customer (KYC) checks, as outlined in the Rainbow KYC Policy. And go through Anti-Money Laundering (AML) checks. Accounts will only be issued to businesses that have passed these KYC procedures.</p> <p>Rainbow confirms that it is not Rainbow’s policy to deny Registry Account requests solely based on the country in which the requestor is headquartered or based. The above Registry Account application process is available to applicants based in any country.</p> <p>Exceptions:</p> <p>The only exceptions are outlined in the Rainbow KYC Policy, which states that Account Holders must not be based in FATF high-risk jurisdictions (currently: Myanmar, North Korea, Iran), nor named on government-sponsored watchlists or international (UN) sanctions lists. If any of these triggers are met, an Account cannot be opened. If such a trigger is identified for an existing Account, an Account closure process will be initiated.</p>	
	<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>.</p>	
	<p>The Account creation procedure can be found in Rainbow Procedures Manual, section Registry requirement, paragraph on “Account creation”, available at this weblink: https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#account-creation</p>	
	<p>The KYC procedure can be found on the Rainbow Documentation Hub, in Governance & Integrity and is available at this weblink: https://docs.rainbowstandard.io/other/governance-and-integrity/kyc-policy</p> <p>The Anti-Money Laundering (AML) Policy can be found on the Rainbow Documentation Hub, in Governance & Integrity and is available at this weblink:</p>	

<https://docs.rainbowstandard.io/other/governance-and-integrity/anti-money-laundering-aml-policy>

	<p>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>”?</p>	<p><input checked="" type="checkbox"/> YES</p>																																										
<p>Describe how the Registry does or will implements this provision:</p>																																												
<p>The Rainbow Registry, developed and administered internally by Rainbow, has the technical capability to label Rainbow Credits as CORSIA-eligible emissions units in accordance with the requirements set out in the Rainbow Carbon Credits procedure, that can be found in Rainbow Procedures Manual.</p> <p>This capability allows for the designation of specific Credit Batches as “CORSIA-eligible,” which will be publicly visible on a Batch-basis. Each Credit Batch will be clearly marked as either “CORSIA Eligible” or not, as determined by Rainbow’s established business processes. As of now, this labelling has not yet been applied to any Credits, as the Rainbow Registry is currently undergoing the ICAO approval process.</p>																																												
<p>7.3</p>	<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>.</p>																																											
<p>The definition of credit attributes can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph on “Credit attributes”, available at this weblink: https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#credit-blocks</p>																																												
<p>The accreditation label will be displayed as such, on the project page credit table:</p>																																												
<table border="1"> <thead> <tr> <th colspan="7">Verified credits</th> </tr> <tr> <th>Mechanism</th> <th>Durability</th> <th>Vintage</th> <th colspan="2">Accreditation</th> <th colspan="2">Credit serial number</th> </tr> </thead> <tbody> <tr> <td>Removal</td> <td>1000 yrs</td> <td>2025</td> <td>CORSIA-eligible</td> <td>CCP</td> <td colspan="2">RIV-BE-57-AVD-2022-a73ad/1:1000</td> </tr> <tr> <td>Removal</td> <td>500 yrs</td> <td>2024</td> <td>CORSIA-eligible</td> <td>ICVCM</td> <td colspan="2">RIV-BE-57-AVD-2023-def12e/1:1000</td> </tr> <tr> <td>Removal</td> <td>1000 yrs</td> <td>2023</td> <td>CORSIA-eligible</td> <td></td> <td colspan="2">RIV-BE-57-AVD-2023-def12e/1:1000</td> </tr> <tr> <td>Removal</td> <td>1000 yrs</td> <td>2022</td> <td>CORSIA-eligible</td> <td>CCP</td> <td colspan="2">RIV-BE-57-AVD-2023-def12e/1:1000</td> </tr> </tbody> </table>			Verified credits							Mechanism	Durability	Vintage	Accreditation		Credit serial number		Removal	1000 yrs	2025	CORSIA-eligible	CCP	RIV-BE-57-AVD-2022-a73ad/1:1000		Removal	500 yrs	2024	CORSIA-eligible	ICVCM	RIV-BE-57-AVD-2023-def12e/1:1000		Removal	1000 yrs	2023	CORSIA-eligible		RIV-BE-57-AVD-2023-def12e/1:1000		Removal	1000 yrs	2022	CORSIA-eligible	CCP	RIV-BE-57-AVD-2023-def12e/1:1000	
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On the issuance page:

Rainbow Documentation rainbowstandard.io Login Create account

20 credits issued to Carbon centric

Dec 20, 2024 Feb 1, 2025

Project start date
BC Trading AB's activities qualify for credits

20 credits issued
BC Trading AB's activities qualify for credits

General information

Status Verification

Verified by Carbon Check (India) Private Limited

Issued to Carbon centric

Location Lacaneau, FR

Transaction details

Amount 317 tCO₂eq

Completed at 15/12/2025

Transaction ID 061ea427-4e70-410c-a2b9-f8c62238540b

Monitoring period 01/05/2025 - 30/10/2025

Credit details

Mechanism Removal

Credit IDs RIV-FR-106-RMV-2025-8540b/1317

Vintage year 2025

Durability 1000 yrs

Labels CCP CORSIA-eligible

Project information Go to project

Status Certified

Developed by BC Trading AB

Project ID RIV-2025-PROJ-104

Methodology Biomass carbon removal and storage

Verifier Carbon Check (India) Private Limited

Credit ID start	Credit ID end	Status	Last update date
1	25	Retired	Jan 25, 2024
26	50	Buffer	Jan 25, 2024
51	100	Transferred	Jan 25, 2024
101	317	Verification	Jan 25, 2024

This screenshot shows a specific Issuance of credits from a validated Project on the Rainbow Registry. The highlighted section is not shown today on the Rainbow Registry, given we have not yet received approval from ICAO.
 See here for the public access to an issuance batch: <https://registry.rainbowstandard.io/ledger/transactions/d32276d3-3168-444d-af6c-5ad1170b70ae>

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	<input checked="" type="checkbox"/> YES
------------	---	---

the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle?

Describe how the Registry does or will implement these provisions:

Rainbow Registry Account Holders can administer the Rainbow Carbon Credits in their Account directly via the Registry user interface, available by logging in at Rainbow Registry. Users may directly retire credits (which if the terminology we use for cancelation of emissions units for the purposes of CORSIA), and must specify the purpose of the Retirement during this process. Once a user submits a credit retirement, the credits are immediately retired, and a public, permanent Retirement Certificate is generated.

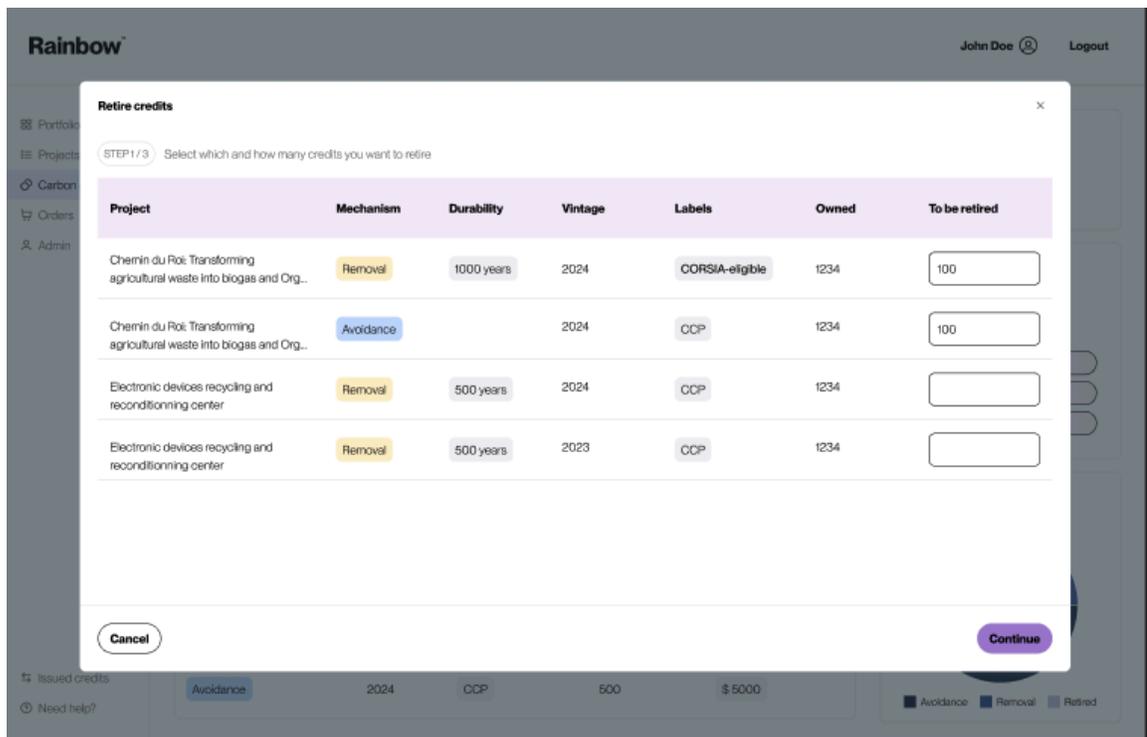
Upon ICAO approval of the Rainbow Registry, an additional Retirement Purpose, "Meeting CORSIA offsetting requirements", will be made available to Registry users.

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*.

The retirement procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph "Retirements", publicly available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#retirements>

See below screenshot of the retirement process on Rainbow Registry:

Step 1: credit selection



Step 2: confirmation of volume

Retire credits (STEP 2 / 3) Review the credits you have selected to be retired

Project	Selected credits	To be retired
Chemin du Roi: Transforming agricultural waste into biogas and Org..	Removal 1000 years 2023	100
Chemin du Roi: Transforming agricultural waste into biogas and Org..	Avoidance 2024	500

Buttons: Cancel, Total credits to be retired: 600, Go back, Continue

Step 3: retirement reason and beneficiary

Retire credits (STEP 3 / 3) Specify a retirement reason and who is retiring the credits

Retiring credits on behalf of another company

Company name: Company Inc.

Company country: United States of America

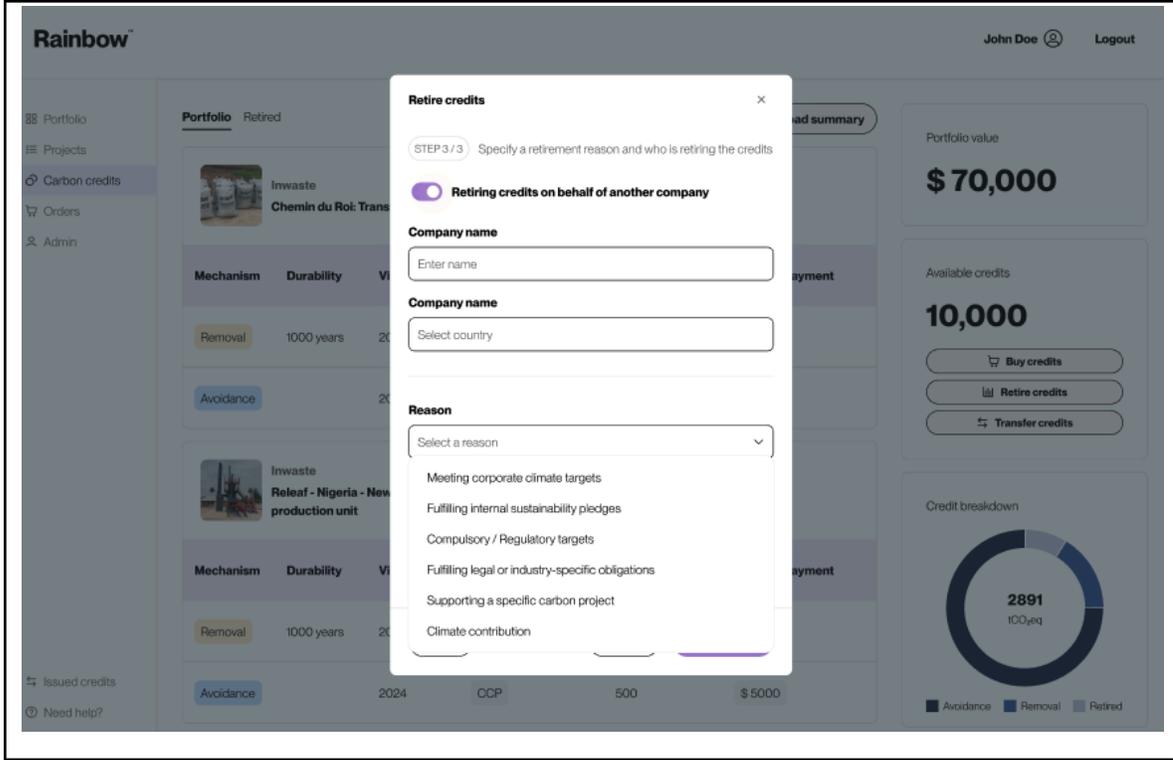
Reason: Select a reason

Additional notes (Optional): Enter any additional notes

Buttons: Cancel, Go back, Retire credits

Background Dashboard:

- Portfolio value: \$70,000
- Available credits: 10,000
- Buttons: Buy credits, Retire credits, Transfer credits
- Credit breakdown: 2891 tCO₂e/yr
- Legend: Avoidance, Removal, Retired



	<p>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.</p>	<p><input checked="" type="checkbox"/> YES</p>
	<p>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?</p>	<p><input checked="" type="checkbox"/> YES</p>
<p>7.5</p>	<p>Describe how the Registry does or will implement these provisions:</p> <p>Rainbow confirms that within 1-3 business days of receiving a Retirement instruction from an Account Holder via the Rainbow Registry platform, the corresponding Rainbow Credits will be retired. A public Retirement Certificate will be automatically generated, documenting the details of the Retired Credits.</p> <p>As described in the Rainbow Carbon Credits Procedure, Registry Account Holders can also submit a Retirement directly through the Rainbow Registry User Interface, after which the corresponding Credits are immediately Retired.</p> <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>.</p> <p>The retirement procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Retirements”, publicly available at this weblink:</p>	

<https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#retirements>

See screenshots example in question 7.4

In addition retirement certificates can be found on the Rainbow Registry, tab “Retirements”.
Example:

74 credits retired by Cloverly on behalf of Wascosa Group Holding S.A.R.L.. Retirement

General information

Retired by: Cloverly
On behalf of: Wascosa Group Holding S.A.R.L.
Reason: CO2 Compensation for 2025
Certificate: [Download](#)

Transaction details

Amount: 74 tCO₂e
Completed at: 24/02/2026
Transaction ID: 6fe0163f-d343-4779-af64-4d3b773209a0

Credits details

Mechanism: Removal
Credit IDs: RIV-FR-14-RMV-2024-637e6/25-98
Vintage year: 2024

Project information [Go to project](#)

Status: Credited
Developed by: Manufacture Bois Paille
Project ID: RIV-2023-PROJ-14
Methodology: Biobased construction materials
Verifier: Verifavia

Villefranche-sur-Saone, FR

Download certificate

Link:
<https://registry.rainbowstandard.io/ledger/transactions/6fe0163f-d343-4779-af64-4d3b773209a0>

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:	
Rainbow Registry Account Holders can access a full list of their previous Retirements directly within their Registry Account by logging in at Rainbow Registry.		
Any public user may download a comprehensive CSV report of retirements completed on the Rainbow Registry.		

Additionally, upon request, Rainbow will provide Account Holders with a comprehensive CSV report of their Retirements. This report can include either all historic Retirements or Retirements for a specific date range, as specified by the Account Holder. The CSV report contains all necessary consolidated information to meet reporting requirements, in accordance with the Rainbow Standard Documentation.

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*.

Public downloads from the Registry retirement page
<https://registry.rainbowstandard.io/ledger/retired-credits>

Rainbow carbon credit registry

The Rainbow Registry is a public ledger for carbon credits issued under the Rainbow Standard. It ensures full transparency on certified projects and credits, tracks carbon credits throughout their lifecycle—from issuance to retirement—and connects projects with resellers to facilitate transactions

Total verified climate impact
399,760 tCO₂eq
 As of March 6, 2026

Projects **Retired credits** Issued credits Canceled credits

Q Search

DATE ↓	AMOUNT (tCO ₂ e)	RETIRED BY	BENEFICIARY	VINTAGE	MECHANISM	COUNTRY	METHODOLOGY
27 Feb 26	20	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2024			Biobased Mat
27 Feb 26	18	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France 🇫🇷	Biobased Mat
27 Feb 26	26	Rainbow	Rainbow.	2023	Avoidance	France 🇫🇷	General Std Rules
26 Feb 26	24	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France 🇫🇷	E-Refurb
26 Feb 26	10	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2022	Avoidance	France 🇫🇷	E-Refurb
26 Feb 26	24	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France 🇫🇷	Batt2Life

7.7	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?	☑ YES
	b. Does the Programme Registry disclose documentation of such practices (row a) upon request?	☑ YES
	c. Does the Programme Registry utilize appropriate method(s) to authenticate the identity of each user accessing an account?	☑ YES
	d. Does the Programme Registry grant each user access only to the information and functions that a user is entitled to?	☑ YES

<p>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?</p>	<p><input checked="" type="checkbox"/> YES</p>
<p>f. Do such security features (rows a – e) meet and undergo periodic updates in accordance with industry best practice?</p>	<p><input checked="" type="checkbox"/> YES</p>
<p>Describe how the Registry implements each provision in rows a – f:</p>	
<p>a) Yes, Rainbow adheres to best-in-class security provisions, subject to periodic audits (conducted at least bi-annually) to ensure compliance. Our operational policies and processes are aligned with the ISO27001 controls. <i>“The following elements shall be verified:</i></p> <ul style="list-style-type: none"> ● <i>Verify compliance with the above requirements</i> ● <i>Verify security vulnerability status and upgrade all JavaScript dependencies with npm.</i> ● <i>Review Authentication provider access</i> ● <i>Review Cloud provider IAM accounts and access</i> ● <i>Rotate database passwords, API keys (internal and external)</i> ● <i>Review Database connection allowlist</i> ● <i>Review repository history for leaked secrets</i> ● <i>Verify application authorization rules”</i> <p>Furthermore, Rainbow has contracted with a certification provider to conduct a SOC2 assessment and certification by the end of Q3. The engagement letter may be accessed at this weblink: https://drive.google.com/file/d/1VySrKbmMzpz4s9CmPOEAEKzDND0KEQH/view?usp=sharing</p> <p>The scope of this assessment covers Rainbow Registry and Rainbow Certification. This includes the implementation of recurring automated tests to improve the security standards.</p> <p>Rainbow will update TAB on the progress on this assessment.</p> <p>b) Yes, Rainbow can disclose security audit reports and other documentation related to data security practices, in accordance with the above cited procedure. The report are made available on the Miscellaneous section of Administrative Oversight Record on the Rainbow Documentation Hub, available at: https://docs.rainbowstandard.io/other/administrative-oversight#miscellaneous Upon request by a relevant body (e.g., ICAO) can provide further details of the security assessment.</p> <p>c) Yes, the Rainbow Registry utilises appropriate methods to authenticate the identity of each user accessing an account, thanks to Auth0 user management and identification system.</p> <p>In further details:</p>	

- Rainbow Registry requires a verified email in order to log in, user accounts are only created by platform admins (e.g; Account Holder admin. In order to log in, a user must have access to the email in order to accept the invite and set their password.
- every API request (from the web application frontend to the backend) is validated via Bearer token by the backend before it is handled, ensuring any access of data or action taken is authenticated. Bearer tokens are valid for 10 hours before they need to be refreshed with Auth0.

d) Yes, Rainbow Registry enforces 4 different roles types, as detailed in the Roles & Permissions for Registry

Role types	Description
Registry administrator	The registry administrator has the highest level of permissions, including the management of RCCs, projects, and users. This role is held by the Secretariat.
Certification lead	The Certification lead is a member of the Rainbow Certification team is responsible for creating and managing projects within the registry. They issue and cancel RCCs. They upload project-related files and update project statuses.
Account holder administrator	Account Holder Administrators are designated by the Account Holder during the account setup process and are created by Rainbow. They have the authority to manage Users within their account and oversee RCCs, including transfers and retirements.
Account holder user	can access the registry, and manage RCCs (transfers, retirements) when appropriate

This is available in the Procedures Manual at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#roles-and-permissions>

e) Yes, Rainbow adheres to user interface design best practices and has conducted extensive end-to-end user testing of the Rainbow Registry to ensure clarity and minimize the risk of user confusion or error. All transactions on the Registry follow a structured, intuitive process:

- Each transaction begins from a clear starting point in the interface.
- Users are guided through a step-by-step flow.
- Before finalization, users are presented with a summary of their proposed transaction and must explicitly confirm their action.

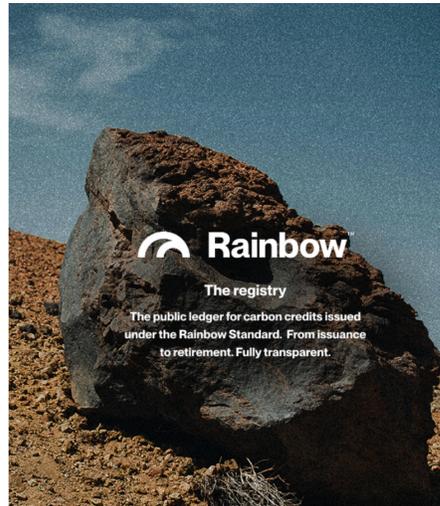
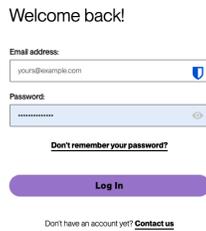
f) Rainbow’s Product & Tech team continuously updates the software powering the Rainbow Registry, averaging over 10 releases per week. Open source dependencies audited monthly for Common Vulnerabilities and Exposures (CVEs) and all critical and high priority vulnerabilities are addressed immediately. The Rainbow Registry has several suites of automated tests operating at varying levels of integration, many of which verify aspects listed above, including user authentication and role permissions. Automated tests must pass before a change is deployed to production.

Additionally to bi-annual security checks and as part of SOC2 certification Rainbow will conduct periodic compliance audits (at least annually) to ensure adherence to best-in-class security provisions. Our operational policies and processes are aligned with the CIS Critical Security Controls (CIS Controls). External security audits are performed by recognized providers, including:

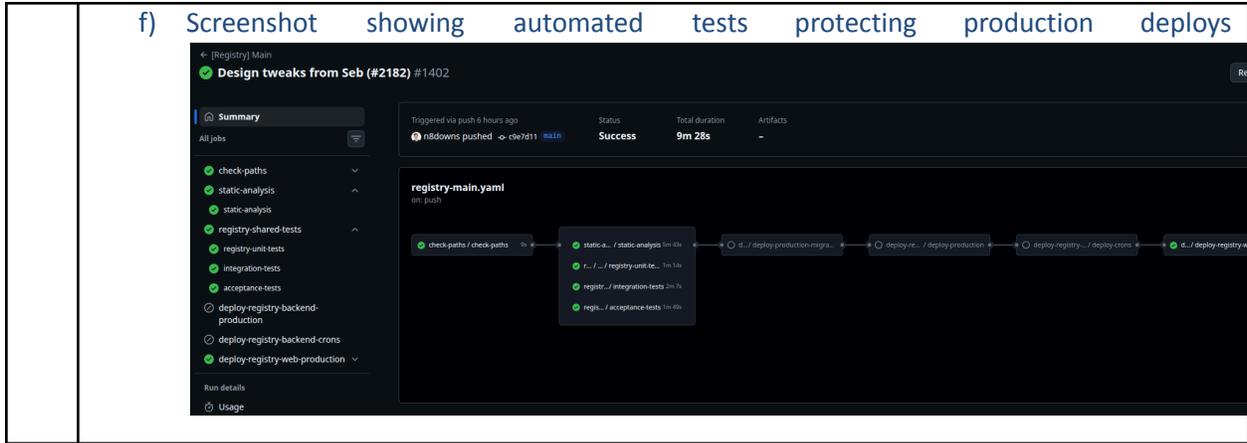
- Operations and technology: Cyber Essentials certification program (assessed by The IASME Consortium Ltd)
- Product and infrastructure security: Independent penetration testing

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*.

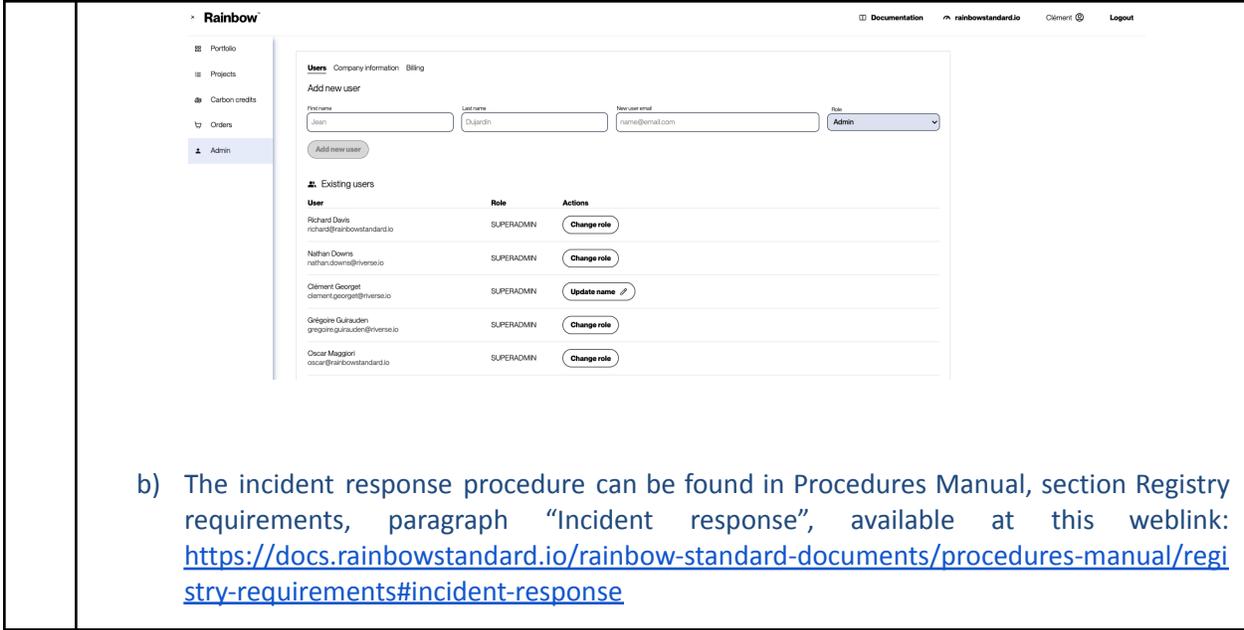
- a) For further details, refer to the Rainbow Procedures Manual, section Registry requirements, paragraph on “Security standards”, available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#security-standards>
- b) Administrative Oversight Record on the Rainbow Documentation Hub, available at: <https://docs.rainbowstandard.io/other/administrative-oversight#miscellaneous>
- c) Rainbow Registry log in page:



- d) Roles and permissions requirement is available in the Procedures Manual at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#roles-and-permissions>
- e) See screenshots provided in question 7.4



7.8	<p>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?</p>	<input checked="" type="checkbox"/> YES
	<p>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?</p>	<input checked="" type="checkbox"/> YES
	<p>Describe how the Registry does or will implement each provision in rows a and b:</p>	
	<p>a) Rainbow maintains up-to-date contact information for all Registry Account Holders. In the event of a data security or integrity breach, Rainbow will promptly notify all affected Account Holders and provide ongoing updates regarding actions taken, resolution, and any follow-up remediations or mitigations implemented.</p> <p>b) In the event of a data or security breach, Rainbow staff will immediately inform all relevant internal stakeholders involved in the Rainbow Standard. Rainbow will then notify and engage the ICAO Secretariat in accordance with the procedures outlined for material deviations, as detailed in the Rainbow Incident Response Policy.</p>	
	<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>.</p>	
<p>a) Screenshot of contact details on the logged in view of the Registry:</p>		



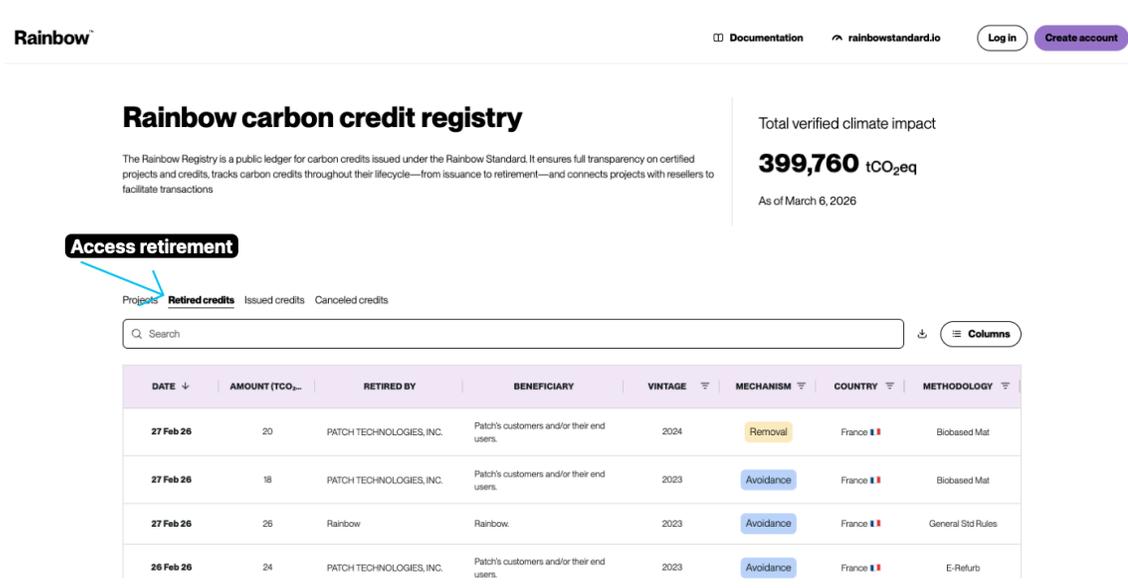
The screenshot shows the 'Rainbow' Admin interface. On the left is a navigation menu with 'Admin' selected. The main content area has tabs for 'Users', 'Company information', and 'Billing'. Under 'Users', there is a form to 'Add new user' with fields for 'Firstname' (Joan), 'Lastname' (Dujardin), 'New user email' (name@email.com), and 'Role' (Admin). Below this is a table of 'Existing users' with columns for 'User', 'Role', and 'Actions'.

User	Role	Actions
Richard Davis richard@rainbowstandard.io	SUPERADMIN	Change role
Nathan Downs nathan.downs@inverse.io	SUPERADMIN	Change role
Clément Georget clement.georget@inverse.io	SUPERADMIN	Update name
Gregoire Guirauden gregoire.guirauden@inverse.io	SUPERADMIN	Change role
Oscar Maggioni oscar@rainbowstandard.io	SUPERADMIN	Change role

b) The incident response procedure can be found in Procedures Manual, section Registry requirements, paragraph “Incident response”, available at this weblink: <https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#incident-response>

<p>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 IV⁸?</p>	<input checked="" type="checkbox"/> YES
<p>Describe how the Registry implements these provisions:</p>	
<p>All Retirements on the Rainbow Registry are permanent and irreversible. Once Rainbow Credits are Retired, the Registry does not provide any technical functionality to reverse, reactivate, or further transact those credits.</p> <p>As specified in the Rainbow Carbon Credits Procedure, users must provide a Retirement Purpose to complete the Retirement process. This ensures transparency and compliance with all applicable standards.</p>	
<p>7.9</p>	<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>.</p> <p>The retirement procedure can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “Retirements”, publicly available at this weblink: https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#retirements</p> <p>The status definition for credits can be found in the Procedures Manual, section Rainbow Carbon Credits, paragraph “RCC status”, publicly available at this weblink: https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/rainbow-carbon-credits#rcc-status</p>

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.

7.10	<p>a. Does the Programme Registry ensure that all cancellation information on its website is presented in a user-friendly format?</p>	<p><input checked="" type="checkbox"/> YES</p>																																								
	<p>b. Does the Programme Registry ensure that all cancellation information on its website is available at no cost and with no credentials required?</p>	<p><input checked="" type="checkbox"/> YES</p>																																								
	<p>c. Does the Programme Registry ensure that all cancellation information on its website is capable of being searched based on data fields?</p>	<p><input checked="" type="checkbox"/> YES</p>																																								
	<p>d. Does the Programme Registry ensure that all cancellation information on its website can be downloaded in a machine-readable format, e.g., .xlsx?</p>	<p><input checked="" type="checkbox"/> YES</p>																																								
	<p>Describe how the Registry implements each provision in rows a – d:</p>																																									
<p>a) Rainbow adheres to user interface design best practices and has performed comprehensive end-to-end user testing of the Rainbow Registry. This ensures that all information, including the display of Retirement Certificates, is presented in a clear, intuitive, and user-friendly format</p> <p>b) All Retirement information and Retirement Certificates are directly available on the Rainbow Registry at https://registry.rainbowstandard.io/ , at no cost and with no login/credentials required.</p> <p>c) and d) All Retirement information on the Rainbow Registry is available to be downloaded in a CSV report format, allowing any user to search and filter this information based on data fields, and link directly to the relevant Retirement Certificate on the Registry.</p>																																										
<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>.</p>																																										
<p>a) Screenshot of the registry page</p>  <p>The screenshot shows the Rainbow carbon credit registry interface. At the top, there is a navigation bar with 'Rainbow' logo, 'Documentation', 'rainbowstandard.io', 'Log in', and 'Create account' buttons. The main heading is 'Rainbow carbon credit registry'. Below this, a sub-heading states: 'The Rainbow Registry is a public ledger for carbon credits issued under the Rainbow Standard. It ensures full transparency on certified projects and credits, tracks carbon credits throughout their lifecycle—from issuance to retirement—and connects projects with resellers to facilitate transactions'. To the right, it displays 'Total verified climate impact' as '399,760 tCO₂e_q' as of March 6, 2026. A prominent 'Access retirement' button is highlighted with a blue arrow. Below this, there are tabs for 'Projects', 'Retired credits', 'Issued credits', and 'Canceled credits'. A search bar is present. The main content is a table with columns: DATE, AMOUNT (tCO₂e), RETIRED BY, BENEFICIARY, VINTAGE, MECHANISM, COUNTRY, and METHODOLOGY. The table lists four rows of retired credits, all from France, with mechanisms of Removal or Avoidance.</p> <table border="1"> <thead> <tr> <th>DATE</th> <th>AMOUNT (tCO₂e)</th> <th>RETIRED BY</th> <th>BENEFICIARY</th> <th>VINTAGE</th> <th>MECHANISM</th> <th>COUNTRY</th> <th>METHODOLOGY</th> </tr> </thead> <tbody> <tr> <td>27 Feb 26</td> <td>20</td> <td>PATCH TECHNOLOGIES, INC.</td> <td>Patch's customers and/or their end users.</td> <td>2024</td> <td>Removal</td> <td>France</td> <td>Biobased Mat</td> </tr> <tr> <td>27 Feb 26</td> <td>18</td> <td>PATCH TECHNOLOGIES, INC.</td> <td>Patch's customers and/or their end users.</td> <td>2023</td> <td>Avoidance</td> <td>France</td> <td>Biobased Mat</td> </tr> <tr> <td>27 Feb 26</td> <td>26</td> <td>Rainbow</td> <td>Rainbow.</td> <td>2023</td> <td>Avoidance</td> <td>France</td> <td>General Std Rules</td> </tr> <tr> <td>26 Feb 26</td> <td>24</td> <td>PATCH TECHNOLOGIES, INC.</td> <td>Patch's customers and/or their end users.</td> <td>2023</td> <td>Avoidance</td> <td>France</td> <td>E-Refurb</td> </tr> </tbody> </table>			DATE	AMOUNT (tCO ₂ e)	RETIRED BY	BENEFICIARY	VINTAGE	MECHANISM	COUNTRY	METHODOLOGY	27 Feb 26	20	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2024	Removal	France	Biobased Mat	27 Feb 26	18	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France	Biobased Mat	27 Feb 26	26	Rainbow	Rainbow.	2023	Avoidance	France	General Std Rules	26 Feb 26	24	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France	E-Refurb
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26 Feb 26	24	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France	E-Refurb																																			

b) The retirements can be accessed on the Rainbow Registry at this weblink: <https://registry.rainbowstandard.io/ledger/retired-credits>

c) and d) public downloads from the Registry retirement page <https://registry.rainbowstandard.io/ledger/retired-credits>

Rainbow carbon credit registry

The Rainbow Registry is a public ledger for carbon credits issued under the Rainbow Standard. It ensures full transparency on certified projects and credits, tracks carbon credits throughout their lifecycle—from issuance to retirement—and connects projects with resellers to facilitate transactions

Total verified climate impact

399,760 tCO₂eq

As of March 6, 2026

1. Select information to add to the extract

Projects **Retired credits** Issued credits Canceled credits

Q Search Columns

DATE ↓	AMOUNT (tCO ₂ e)	RETIRED BY	BENEFICIARY	VINTAGE	MECHANISM	COUNTRY	METHODOLOGY
27 Feb 26	20	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2024			Biobased Mat
27 Feb 26	18	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France 🇫🇷	Biobased Mat
27 Feb 26	26	Rainbow	Rainbow.	2023	Avoidance	France 🇫🇷	General Std Rules
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26 Feb 26	10	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2022	Avoidance	France 🇫🇷	E-Refurb
26 Feb 26	24	PATCH TECHNOLOGIES, INC.	Patch's customers and/or their end users.	2023	Avoidance	France 🇫🇷	Batt2Life

2. Download csv

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?

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?

YES

Describe how the Registry does or will implement each provision in rows a and b:

a) The Rainbow Registry maintains a permanent record of all project information, documentation, and Rainbow Carbon Credits issued and retired from a Project. This data is preserved for more than three years beyond the end date of the relevant monitoring period, ensuring long-term accessibility and transparency. Information related to Projects that are no longer operational remains recorded and accessible on the Registry. Rainbow has not implemented technical systems to delete or remove data relevant to Units and Retirements. Project documents may only be deleted in the case of clerical error (e.g. a document was added to the wrong project).

	<p>b) Yes, Rainbow commits to preserving all Registry data as part of its business continuity and wind-down planning, in accordance with the Rainbow Wind Down Policy. This policy ensures the ongoing availability and integrity of Registry data, even in the event of organizational changes.</p>
	<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>.</p>
	<p>a) Project documentation requirements can be found in the Procedures Manual section, Registry requirements, paragraph on "Project documentation", available at this weblink: https://docs.rainbowstandard.io/rainbow-standard-documents/procedures-manual/registry-requirements#project-documentation</p> <p>b) The Wind-down policy is considered confidential and will be shared confidentially directly with the application review committee as part of the formal submission process.</p>