17/9/26

Please note that the attached translation is an excerpt from Section 4 of the TAB Report of September 2026, presented in Appendix B of C/WP-15862.

4. TAB RECOMMENDATIONS ON APPLICATIONS AND MATERIAL CHANGES

4.1 GENERAL ELIGIBILITY PARAMETERS FOR CORSIA COMPLIANCE PERIODS

4.1.1 TAB recommended Eligibility Timeframe and Unit Date Eligibility

CORSIA second phase, 2027-2029 compliance period

4.1.1.1 At its 236th session in October 2025, the ICAO Council approved the general eligibility parameters for application in the first compliance period (2027-2029) of the CORSIA second phase, as recommended in section 4.1.1.2 of TAB's August 2025 report to Council.

4.1.1.2 The following parameters of unit date eligibility apply to all CORSIA Eligible Emissions Units that approved by the ICAO Council for the first compliance period of the CORSIA second phase, in addition to any programme-specific eligibility parameters recommended for a particular programme:

a) eligible for cancellation for use toward CORSIA offsetting requirements in the 2027-2029 compliance period; and

b) issued:

1) to activities that started their first crediting period from **1 January 2016**; and
2) in respect of emissions reductions that occurred from **1 January 2021 through 31 December 2029**.

4.1.1.3 ***Extension of unit date eligibility***: The date(s) in paragraphs 4.1.1.2 above may only be extended to apply to eligibility timeframes beyond the first compliance period (2027-2029) of the CORSIA second phase, and/or eligible unit dates after 31 December 2029, subject to the Council decision and TAB recommendations. TAB may recommend such an extension to the Council where TAB's analysis identifies that an emissions unit programme is fully consistent with all he EUC and guidelines when assessing the eligibility of emissions units with eligibility dates beyond 31 December 2029.

CORSIA first phase, 2024-2026 compliance period

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

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

b) issued:

1) to activities that started their first crediting period from **1 January 2016**; and
2) in respect of emissions reductions that occurred from **1 January 2021 through 31 December 2026**.

4.1.1.5 In accordance with the TAB Procedures, TAB is no longer inviting new applications for eligibility for CORSIA's first phase[12]. All previously eligible programmes continue to be eligible for the first phase, subject to their existing eligibility parameters set out in section II of the ICAO document titled "CORSIA Eligible Emissions Units". TAB will continue to consider and could make additional recommendations for first-phase eligibility of emissions unit programmes that responded to its 2026 call for new applications for CORSIA's second phase (2027-2029 period).

4.2 2026 TAB ASSESSMENT CYCLE: SUMMARY OF RECOMMENDATIONS

4.2.1 In its 2026 assessment cycle, TAB assessed applications from organizations seeking to supply CORSIA Eligible Emissions Units for the 2027-2029 compliance period of the CORSIA's second phase. In parallel, TAB assessed material changes submitted by eligible programmes.

4.2.2 TAB's recommendations to Council from its 2026 assessment cycle are summarized in this section 4.2. Section 4.3 then presents the detailed information on each recommendation, including any programme-specific eligibility parameters and further actions requested of each programme.

Assessments for the CORSIA second phase, 2027-2029 compliance period

4.2.3 Programmes recommended for immediate eligibility

4.2.3.1 In this report, TAB recommends the following four programmes for approval as immediately eligible to supply CORSIA Eligible Emissions Units for the CORSIA's second phase, 2027-2029 compliance period:

- Biocarbon Fund Initiative for Sustainable Forest Landscape (ISFL)
- Forest Carbon Partnership Facility (FCPF)
- Isometric
- Premium T-VER

4.2.4 Programmes recommended for conditional eligibility

4.2.4.1 In this report, TAB recommends the following programme for approval as conditionally eligible to supply CORSIA Eligible Emissions Units for the CORSIA's second phase, 2027-2029 compliance period:

- Global Carbon Council

4.2.5 Programme invited to reapply

4.2.5.1 In this report, TAB recommends that the following programmes be invited to submit an application for TAB's assessment to supply CORSIA Eligible Emissions Units for the CORSIA's second phase, 2027-2029 compliance period:

- Building Emissions Reduction Standard
- C-Capsule & Absolute Climate
- Equitable Earth
- Global C-Sink Standards

[12] Paragraph 7.8 of the TAB Procedures sets out the three-year cycle for TAB assessments and re-assessments.

- International Carbon Registry
- KCS Program
- Planet First Registry
- Open Carbon Protocol
- ORMEX
- Voluntary GHG Reduction System of the Russian Federation

4.2.6 **The Paris Agreement Crediting Mechanism**

4.2.7 In this report, TAB recommends the Paris Agreement Mechanism (PACM) for Council's consideration as conditionally eligible to supply CORSIA Eligible Emissions Units for the CORSIA's first phase (2024-2026 compliance period) and for the second phase (2027-2029 compliance period).

4.2.8 **Applications not possible to assess**

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

- BCarbon
- Coalition for Rainforest Nations
- Zimbabwe Carbon Markets Authority

4.2.9 **Programmes that remain under assessment**

4.2.9.1 TAB intends to conclude its assessment of the following programmes that responded to its 2026 call for applications, for consideration at its 25th meeting (January 2027) and to provide recommendations to the Council to the 240th session of the Council:

- BioCarbon Standard
- Cercarbono
- Climate Action Reserve
- COLCX
- Puro Program
- PV Climate
- Rainbow

4.2.9.2 Paragraph 4.3.25 below describes the approach and next steps for concluding its assessment of these 2026 applications.

4.3 2026 TAB ASSESSMENT CYCLE: DETAILED RECOMMENDATIONS

Assessment for the 2027-2029 compliance period (part of CORSIA second phase)

4.3.1 **Programmes recommended for immediate eligibility**

4.3.1.1 TAB recommends that the following emissions unit programmes should be approved to supply CORSIA Eligible Emissions Units for the 2027-2029 compliance period (part of the second phase):

- Biocarbon Fund Initiative for Sustainable Forest Landscape (ISFL) (see details in section 4.3.2)
- Forest Carbon Partnership Facility (FCPF) (see details in section 4.3.3)
- Isometric (see details in section 4.3.4)
- Premium T-VER (see details in section 4.3.5)

4.3.1.2 The eligibility of the emissions units for the 2027-2029 compliance period should be subject to the general eligibility parameters set out in Section 4.1.1 and any programme-specific parameters set out for each given programme, respectively, in Sections 4.3.2 - 4.3.5 below, which should be clearly described in section III of the ICAO document titled "CORSIA Eligible Emissions Units". Those programmes eligible for the first phase (2024-2026 compliance period) will also continue to be eligible to supply emissions units according to their existing eligibility parameters applicable during the 2024-2026 compliance period, as well as any additional eligibility parameters decided by the Council to apply in the first phase, set out in section II of the ICAO document titled "CORSIA Eligible Emissions Units".

4.3.2 Biocarbon Fund Initiative for Sustainable Forest Landscape (ISFL)

4.3.2.1 TAB recommends that ISFL should be immediately eligible to supply CORSIA Eligible Emissions Units for the 2027-2029 compliance period, and to add this programme to section III of the ICAO document titled "CORSIA Eligible Emissions Units."

Background on programme status

4.3.2.2 In April 2023, ISFL first applied for assessment by TAB for eligibility to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period). The Council approved TAB's recommendation that ISFL be conditionally eligible for the first phase (2024-2026 compliance period) in November 2023, pending ISFL's implementation of further actions requested of the programme (TAB Report dated September 2023) by the Council. In March 2025, ISFL submitted material changes for TAB assessment and in April 2026, the Council approved TAB's recommendation that ISFL be eligible for the first phase (2024-2026 compliance period) and updated the list of further actions requested of the programme (see TAB Report dated January 2026).

4.3.2.3 In March 2026, ISFL applied for assessment of eligibility for the CORSIA 2027-2029 compliance period.

General findings

4.3.2.4 TAB found that the ISFL's procedures, standards and related governance arrangements that were in place and assessed by TAB in 2026, were largely consistent with the contents of the EUC as TAB applied them in its assessments for the 2027-2029 compliance period, for emissions units generated under the programme from 1 January 2021 through 31 December 2029 that are within the programme-specific eligibility parameters set out below. This finding assumes that any limitations to the programme's eligibility scope in previous compliance period(s) that are not reiterated below nonetheless continue to apply unless a relevant procedural change has been accepted or the limitation has been superseded by a more recent and directly related decision by the Council.

4.3.2.5 TAB found that ISFL demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be quantified, monitored, reported and verified, including in relation to this criterion's guidelines for *Auditor conflict of interest*. Such procedures, including the criteria for selecting and then subsequently guiding and evaluating those providers' performance, should clearly specify the programme's expectations of the third parties' own conflict-of-interest policies and procedures,

through which the programme can demonstrate consistency with the applicable Guidelines. These and some other findings summarized in this section informed the programme-specific eligibility parameters and further actions requested of the programme below.

4.3.2.6 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria: Clear methodologies and protocols and their Development Process and Transparency and Public Participation. Here, TAB noted that some programme procedures were not elaborated in detail to enable a full understanding of the programme's internal processes for, e.g., methodological rule or procedure development or revision, for triggering reviews of or determining the need for updates and how this is managed; the types of technical, scientific, or practical experience that form basis of programme development of revisions; and whether and how stakeholder inputs are invited and how these are reconciled in the development or revision of methodological rules or procedures, or of procedures governing programme operations

4.3.2.7 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way and below the *business-as-usual* emissions projections". This common finding is further discussed in Section 4.4 of the TAB Report dated January 2023.

4.3.2.8 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Are only counted once towards a mitigation obligation, specifically in relation to the criterion's guidelines for *Host country attestation to the avoidance of double-claiming* and *Host country attestation specifications.* TAB noted that the sequence of labelling emission units as CORSIA eligible units in advance of the publication of the relevant letter of authorization stands in contrast to the sequencing of these steps described in the guideline *Host country attestation to the avoidance of double-claiming*. TAB also noted some missing elements in the contents of host country attestations, as described in the guideline *Host country attestation specifications*. Some of these were common findings discussed in the TAB report dated August 2025, Section 4.2 (*General Eligibility Parameters*) and in its Section 4.4 (*Criteria Interpretations*).

Programme-specific eligibility parameters

4.3.2.9 *Scope*: Biocarbon Fund Initiative for Sustainable Forest Landscape submitted for TAB's assessment all activity types and scales, unit types, methodologies and procedural categories supported by the programme. TAB recommends the following *Scope of eligibility* to be added to Part III of ICAO document titled "CORSIA Eligible Emissions Units":

Biocarbon Fund Initiative for Sustainable Forest Landscape

Scope of eligibility: Emission Reduction Units (ERUs) generated under ISFL programs, including any additional certifications, that:

have been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming, and

for which the programme has verified in, accordance with its procedures, that the corresponding adjustment(s) have already been applied as fully reflected in the host Party's biennial transparency report (BTR) and/or are the subject

of a Guarantee that encompasses CORSIA eligible emissions unit compensation in the event of double-claiming and is approved by the programme covering all units to which the host country Letter of Authorization applies, and have Eligible Unit Dates within the relevant CORSIA compliance period,

and with the exclusion of the following activity and/or unit types, methodologies, programme elements and/or procedural classes:

Emissions units issued to programs using methods for which the programme itself and/or its national programs have not quantitatively demonstrated in publicly available information that the baseline(s) resulting from the standard's use are set below the *business-as-usual* level of emissions or, for non-traditional activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity.

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

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

Further actions requested of the programme

4.3.2.10 TAB recommends that the Council requests ISFL to undertake the following further actions, which do not need to be taken prior to adding ISFL to section III of the ICAO document titled "CORSIA Eligible Emissions Units"; TAB will request a progress update pertaining to requested further action(s) during the 2027 assessment cycle:

a) Clarify the programme-level criteria and requirements to apply to the programme selection and engagement of validation and verification bodies, in relation to the Guideline(s) for Criteria Interpretation listed above (*Auditor conflict of interest)*. Such procedures, including the criteria for selecting and then subsequently guiding and evaluating those providers' performance, should clearly specify the programme's expectations of the third parties' own conflict-of-interest policies and procedures, through which the programme can demonstrate consistency with the applicable Guidelines;

b) Put in place procedures requiring the programme, its methodology developers and/or activity proponents to quantitatively demonstrate in publicly available information that the baseline(s) resulting from the standard's use are set below the business-as-usual level of emissions or, for non-traditional activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity

c) In the next revision to the programmes' procedures for the avoidance of double-claiming, for TAB's review no later than the first call for submissions of procedural changes in 2027, as needed :

   i. update programme's procedures related to the contents of host country attestations to include all contents specified in the Guideline *Host country attestation specifications*, in particular for the specification of the eligible CORSIA compliance period(s), as well as the required elements listed in decision 4/CMA.6, paragraph 5.

   ii. reincorporate provisions from previous version(s) of the programme guidance that include a host country declaration of the avoidance of double-claiming in the expected attestation contents.

   iii. further elaborate the timing and specific processes by which the programme will 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, for example to indicate the reports to be monitored and sequencing of steps to be taken by the programme.

d) Clarify the programme's internal processes for, e.g., methodological rule or procedure development or revision, for triggering reviews of or determining the need for updates and how this is managed; or the types of technical, scientific, or practical experience that form basis of programme development of revisions; make these clarifications or procedures available publicly and to TAB.

e) In the next relevant update to programme procedures, clarify in greater detail and make available its procedures for public comments in relation to programme decisions on procedural/rulesets development or revisions, or programme operations, specifying procedures guiding timing of public comment calls and submissions, who may comment, the applicable period, and how comments are considered, as applicable.

f) Advance its consideration of responses to confirmed instances of double-claiming, such as, inter alia, whether to cease qualifying offset credits from the respective country for CORSIA, or possible limitations to permitted compensation measure(s).

4.3.3 Forest Carbon Partnership Facility (FCPF)

4.3.3.1 TAB recommends that FCPF should be immediately eligible to supply CORSIA Eligible Emissions Units for the 2027-2029 compliance period, and to add this programme to section III of the ICAO document titled "CORSIA Eligible Emissions Units."

Background on programme status

4.3.3.2 In April 2023, FCPF first applied for assessment by TAB for eligibility to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period). The Council approved TAB's recommendation that FCPF be conditionally eligible for the first phase (2024-2026 compliance period) in November 2023, pending FCPF's implementation of further actions requested of the programme (TAB Report dated September 2023) by the Council. In March 2025, FCPF submitted material changes for TAB assessment in response to the Council decision from November 2023 and 2024. In April 2026, the Council approved TAB's recommendation that FCPF be eligible for the first phase (2024-2026 compliance period) and updated the list of further actions requested of the programme (see TAB Report dated January 2026).

4.3.3.3 In March 2026, FCPF applied for assessment of eligibility for the CORSIA 2027-2029 compliance period.

General findings

4.3.3.4 TAB found that the FCPF's procedures, standards and related governance arrangements that were in place and assessed by TAB in 2026, were largely consistent with the contents of the EUC as TAB applied them in its assessments for the 2027-2029 compliance period, for emissions units generated under the programme from 1 January 2021 through 31 December 2029 that are within the programme-specific eligibility parameters set out below. This finding assumes that any limitations to the programme's eligibility scope in previous compliance period(s) that are not reiterated below nonetheless continue to apply unless a relevant procedural change has been accepted or the limitation has been superseded by a more recent and directly related decision by the Council.

4.3.3.5 TAB found that FCPF demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be quantified, monitored, reported and verified, including in relation to this criterion's guidelines for *Auditor conflict of interest*. Such procedures, including the criteria for selecting and then subsequently guiding and evaluating those providers' performance, should clearly specify the programme's expectations of the third parties' own conflict-of-interest policies and procedures, through which the programme can demonstrate consistency with the applicable Guidelines. These and some other findings summarized in this section informed the programme-specific eligibility parameters and further actions requested of the programme below.

4.3.3.6 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria: Clear methodologies and protocols and their Development Process and Transparency and Public Participation. Here, TAB noted that some programme procedures were not elaborated in detail to enable a full understanding of the programme's internal processes for, e.g., methodological rule or procedure development or revision, for triggering reviews of or determining the need for updates and how this is managed; the types of technical, scientific, or practical experience that form basis of programme development of revisions; and whether and how stakeholder inputs are invited and how these are reconciled in the development or revision of methodological rules or procedures, or of procedures governing programme operations.

4.3.3.7 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way and below the *business-as-usual* emissions projections". This common finding is further discussed in Section 4.4 of the TAB Report dated January 2023.

4.3.3.8 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion: Carbon offset credits must be quantified, monitored, reported and verified, and its guideline *Re-evaluation of assumptions*, in relation to the maximum allowable verification interval which remains undefined in programme procedures.

4.3.3.9 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Are only counted once towards a mitigation obligation, specifically in relation to the criterion's guidelines for *Host country attestation to the avoidance of double-claiming* and *Host country attestation specifications.* TAB noted that the sequence of labelling emission units as CORSIA eligible units in advance of the publication of the relevant letter of authorization stands in contrast to the sequencing of these steps described in the guideline *Host country attestation to the avoidance of double-claiming* and noted some missing elements in the contents of host country attestations, as described in the guideline *Host country attestation specifications*. Some of these were common findings discussed in the TAB report of August 2025, Section 4.2 (*General Eligibility Parameters*) and in its Section 4.4 (*Criteria Interpretations*).

Programme-specific eligibility parameters

4.3.3.10 *Scope:* Forest Carbon Partnership Facility submitted for TAB's assessment most of its activity types and scales, unit types, methodologies and procedural categories supported by the programme. TAB recommends the following *Scope of eligibility* to be added to Part III of ICAO document titled "CORSIA Eligible Emissions Units":

Forest Carbon Partnership Facility

Scope of Eligibility:

Emission Reduction Units (ERUs) generated under REDD+ ER programs associated with FCPF, including any additional certifications, that

> have been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming, and
>
> for which the programme has verified in, accordance with its procedures, that the corresponding adjustment(s) have already been applied as fully reflected in the host country's biennial transparency report (BTR) and/or are the subject of a Guarantee that encompasses CORSIA eligible emissions unit compensation in the event of double-claiming and is approved by the programme, covering all units to which the host country Letter of Authorization applies, and that have Eligible Unit Dates within the relevant CORSIA compliance period,

And with the exclusion of the following activity and/or unit types, methodologies, programme elements, and/or procedural classes:

Emissions units issued to programs using methods for which the programme itself and/or its national programs have not quantitatively demonstrated in publicly available information that the baseline(s) resulting from the standard's use are set below the *business-as-usual* level of emissions or, for non-traditional

activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity.

All emissions units issued to programs that do not have in place a Reversal Management Mechanism implemented under the supervision of the World Bank through at least 31 December 2037, including a periodic monitoring and third-party verification mechanism, that FCPF approves as demonstrating up-front and continued equivalence to the ER Program CF Buffer through at least the date referred to in this sub-paragraph and ideally longer, according to 1) FCPF's summary of measures for determining this "equivalence" and 2) the Mechanisms' consistency with the procedures that FCPF conveyed to TAB in its application and all subsequent form(s) and communications with TAB, in respect of all EUC and *Guidelines for Criteria Interpretation*, with an emphasis on the following:

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

Further actions requested of the programme

4.3.3.11 TAB recommends that the Council requests FCPF to undertake the following further actions, which do not need to be taken prior to adding FCPF to section III of the ICAO document titled "CORSIA Eligible Emissions Units"; TAB will request a progress update pertaining to requested further action(s) during the 2027 assessment cycle:

a) Clarify the programme-level criteria and requirements to apply to the programme selection and engagement of third-party crediting registry provider and/or validation and verification bodies, in relation to the Guideline(s) for Criteria Interpretation (*Auditor conflict of interest)*. Such procedures, including the criteria for selecting and then subsequently guiding and evaluating those providers' performance, should clearly specify the programme's expectations of the third parties' own conflict-of-interest policies and procedures, through which the programme can demonstrate consistency with the applicable Guidelines.

b) Clarify the programme's internal processes for, e.g., methodological rule or procedure development or revision, for triggering reviews of or determining the need for updates and how this is managed; or the types of technical, scientific, or practical experience that form basis of programme development of revisions; make these clarifications or procedures available publicly and to TAB.

c) In the next relevant update to programme procedures, clarify in greater detail and make available its procedures for public comments in relation to programme decisions on procedural/rulesets development or revisions, or programme operations, specifying procedures guiding timing of public comment calls and submissions, who may comment, the applicable period, and how comments are considered, as applicable.

d) Put in place procedures requiring the programme, its methodology developers and/or activity proponents to quantitatively demonstrate in publicly available information that the baseline(s) resulting from the standard's use are set below the business-as-usual level of emissions or, for non-traditional activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity.

e) In the next revision to the programmes' procedures for the avoidance of double-claiming, for TAB's review no later than the first call for submissions of procedural changes in 2027, as needed:

   i. update programme's procedures related to the contents of host country attestations to include all contents specified in the Guideline *Host country attestation specifications*, in particular for the specification of the eligible CORSIA compliance period(s), as well as the required elements listed in decision 4/CMA.6, paragraph 5.

   ii. (re-)incorporate provisions from previous version(s) of the programme guidance that include a host country declaration of the avoidance of double-claiming in the expected attestation contents.

   iii. Further elaborate the timing and specific processes by which the programme will 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, for example to indicate the reports to be monitored and sequencing of steps to be taken by the programme;

f) Put in place procedures defining and/or clearly indicating the maximum allowable verification interval and the procedure applicable if that interval is exceeded or demonstrate why such a circumstance cannot occur under the FCPF rules.

g) To advance its consideration of responses to confirmed instances of double-claiming, such as, inter *alia*, whether to cease qualifying offset credits from the respective country for CORSIA, or possible limitations to permitted compensation measure(s).

4.3.4 **Isometric**

4.3.4.1 TAB recommends that Isometric should be immediately eligible to supply CORSIA Eligible Emissions Units for the 2027-2029 compliance period, and to add this programme to section III of the ICAO document titled "CORSIA Eligible Emissions Units."

Background on programme status

4.3.4.2 In April 2024, Isometric first applied for assessment by the TAB for eligibility to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period). Council approved TAB's recommendation that Isometric be conditionally eligible for the first phase (2024-2026 compliance period) in November 2024, pending Isometric's implementation of Further actions requested of the programme (TAB Report dated August 2024) by the Council. In March 2025, Isometric submitted material changes for TAB assessment and in October 2025, the Council approved Isometric as immediately eligible for the CORSIA first phase.

4.3.4.3 In March 2026, Isometric submitted an application for TAB's assessment seeking eligibility for the 2027-2029 compliance period.

General findings

4.3.4.4 TAB found that the Isometric's procedures, standards and related governance arrangements that were in place and assessed by TAB in 2026, were largely consistent with the contents of the EUC as TAB applied them in its assessments for the 2027-2029 compliance period, for emissions units generated under the programme from 1 January 2021 through 31 December 2029 that are within the programme-specific eligibility parameters set out below. This finding assumes that any limitations to the programme's eligibility scope in previous compliance period(s) that are not reiterated below nonetheless continue to apply unless a relevant procedural change has been accepted or the limitation has been superseded by a more recent and directly related decision by the Council.

4.3.4.5 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way and below the *business-as-usual* emissions projections". This common finding is further discussed in Section 4.4 of the TAB Report dated January 2023. These and some other findings summarized in this section informed the programme-specific eligibility parameters and further actions requested of the programme below.

4.3.4.6 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria Avoidance of Double Counting, Issuance and Claiming and Are only counted once towards a mitigation obligation, and related guideline *Double issuance, double use and double selling* stating that programme should have procedures in place for programmes and/or registry administrator monitoring of programme registry(es) to discourage and prohibit the double-selling of units. TAB noted that double selling is distinct from other "double's" that can be prevented through robust registry architecture, procedures preventing double registration, and active monitoring of registry activity. Rather, double selling may not involve any transfer of units; it could occur through the seller's misrepresentation of unit ownership or registry functionalities or account information and may arise at point-of-sale/contractually, typically illegally. TAB recognized that this risk can be addressed *indirectly* by, e.g., avoiding or strictly limiting the use of registry sub-accounts, conducting thorough KYC processes, and limiting registry access to registered businesses and individuals. However, the Guideline itself does not expect programmes to have procedures in place to *directly ensure* the avoidance of double selling because programmes are limited in their ability to monitor market activity that extends beyond registry activity. That is more often the responsibility of financial market regulators. However, the Guideline does indicate that programme procedures should "prohibit" such activities and discourage them, for example by indicating the consequences of such market activities, should they come to light.

4.3.4.7 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Are only counted once towards a mitigation obligation and its guidelines *Comparing unit use against national reporting*, where TAB identified the need for minor updates to its "End-to-end" procedures to reflect the expected sequencing and timing of Party reporting set out in Decision 4/CMA.6 (2024). TAB also noted some missing elements in the contents of host country attestations as described in the guideline *Host country attestation specifications*. These common findings were discussed in the TAB report of August 2025, Section 4.2 (*General Eligibility Parameters*) and in Section 4.4 (*Criteria Interpretations*).

4.3.4.8 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Legal Nature and Transfer of Units in respect of procedures addressing ownership

or control of emissions units contributed to a buffer risk pool, where further clarity was needed to achieve consistency with this criterion programme's procedures, for example, to identify how this relates to the programme's procedures for administering the units, any conditional return of the units to the activity participant, and/or their treatment of the units in respect of the activity's cessation. Here, TAB noted that the 2025 assessment's findings and *Further actions requested of the programme* pertaining to this criterion remain relevant.

4.3.4.9 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Offset Credit Issuance and Retirement Procedures —specifically in relation to this criterion's guidelines for the program-designated registry's public-facing elements and reports. This common finding were discussed in the TAB report of August 2025, Section 4.2 (*General Eligibility Parameters*) and in Section 4.4 (*Criteria Interpretations*).

4.3.4.10 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Permanence, where TAB found that the programme delegated EUC-relevant requirements to the level of individual protocols or modules— specifically the responsibility for determination of reversal risk as discussed in the findings from TAB's 2025 assessment cycle, summarized in Section 4.3 of the TAB Report dated August 2025. The findings pertaining to programme- versus protocol- or module-specific procedures are further discussed in Section 4.4. Other permanence-related findings in the same TAB Report remain relevant, apart from those involving the need for a minimum timeframe for monitoring and compensation to be established at the programme-level; this was addressed in recent Standard update.

Programme-specific eligibility parameters

4.3.4.11 *Scope*: Isometric submitted for TAB's assessment all activity types and scales, unit types, methodologies and procedural categories supported by the programme. TAB recommends the following *Scope of eligibility* to be added to Part III of ICAO document titled "CORSIA Eligible Emissions Units":

Isometric

Scope of eligibility	Isometric Credits including any additional certifications, that have been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming, and with the exclusion of the following activity and/or unit types, methodologies, programme elements and/or procedural classes: a) Isometric Credits issued to geological carbon storage activities that are not safeguarded by regulatory frameworks consistent with the Regulatory Scheme CORSIA Eligibility Requirements for Geological CCS Projects[13]. b) Isometric Credits issued in respect of carbon dioxide removals that have not been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming[14].

[13] ICAO document – CORSIA Methodology For Calculating Actual Life Cycle Emissions Values, Section 11.1.

[14] Refers to the "Host country attestation to the avoidance of double-claiming" guideline for interpretation of the "Only counted once towards a mitigation obligation" criterion, in *Application Form Appendix A - Supplementary Information*, paragraph 3.7.

c) Isometric Credits issued to activities that utilize protocols in the categories 'Biomass Carbon Removal and Storage', **with these allowable exceptions**:

The protocol 'Biochar Production and Storage' when used in combination with the modules 'Biochar Storage in Agricultural Soils' and/or 'Biochar Storage in the Built Environment

d) Isometric Credits issued to activities that utilize protocols in the category 'Direct Air Capture, **with these allowable exceptions**:

The protocol 'Direct Air Capture' when used in combination with the modules 'CO2 Storage in Saline Aquifers' and/or 'CO_2 Storage via Carbonation in the Built Environment'

e) Isometric Credits issued to activities that utilize protocols in the categories 'Enhanced Weathering', 'Mineralization', 'Marine' or 'Reforestation', or any other category not listed as an exception above.

f) Isometric Credits issued to activities that have not reported their sustainable development contributions or co-benefits or according to default list(s) of sustainable development criteria that Isometric clearly identifies for such use.

g) Isometric Credits issued to activities using methodologies for which the programme, its methodology developers and/or activity proponents have not quantitatively demonstrated in publicly available information that the baseline(s) resulting from the standard's use are set below the *business-as-usual* level of emissions or, for non-traditional activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity.

Further actions requested of the programme

4.3.4.12 TAB recommends that the Council requests Isometric to undertake the following further actions, which do not need to be taken prior to adding Isometric to section III of the ICAO document titled "CORSIA Eligible Emissions Units":

a) Put in place procedures indicating the nature of ownership or control of emissions units contributed to a buffer risk pool, for example how this relates to the programme's procedures for administering the units, any conditional return of the units to the activity participant, and/or their treatment of the units in respect of the activity's cessation.
b) Put in place procedures requiring the programme, its methodology developers and/or activity proponents to quantitatively demonstrate in publicly available information that the baseline(s) resulting from the standard's use are set below the business-as-usual level of

emissions or, for non-traditional activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity.

c) In the next revision to the programmes' procedures for the avoidance of double-claiming, for TAB's review no later than the first call for submissions of procedural changes in 2027:
   i. update the programme's procedures related to the contents of host country attestations to include all contents specified in the Guideline Host country attestation specifications, in particular for the specification of the eligible CORSIA compliance period(s),
   ii. update the programme's procedures to reflect the timing for host Party submission of the reports to be monitored in line with Decision 4/CMA.6;
   iii. clarify in an update to its *Double claiming reconciliation procedure* at the earliest opportunity that a 5 per cent Corresponding Adjustments Buffer Pool contribution, as referred to in Version 1.7 of the Isometric CORSIA Eligibility Policy, is applicable to projects located in Host Countries with an Organization for Economic Co-operation (OECD) Prevailing Country Risk Classification score of "0"; and
   iv. advance its consideration of responses to confirmed instances of double-claiming, such as, *inter alia*, whether to cease qualifying offset credits from the respective country for CORSIA, or possible revisions to the country's risk classification or limitations to permitted compensation measure(s).

d) Implement updates to the programme registry as necessary to fulfil the functions listed below, as needed to:
   i. enable the clear recording and tracking of information referred to in each field in Table A5-7 of Annex 16, Volume IV, taking into account the relevant guidance in the Environmental Technical Manual, Volume IV[15], preferably as discrete data that is column-separated, searchable, and downloadable—including, in particular, field(s) indicating the compliance period(s) for which a batch of emissions units is eligible, the unique identifier of the account where a batch was cancelled, and the start date of the activity's first crediting period;
   ii. enable the registry to generate report(s) containing the information in paragraph a) upon request of the CORSIA participant account holder or participant's designee; and
   iii. ensure that the information in i) is provided 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;

4.3.5 Premium T-VER

4.3.5.1 TAB recommends that Premium T-VER should be immediately eligible to supply CORSIA Eligible Emissions Units for the 2027-2029 compliance period, and to add this programme to section III of the ICAO document titled "CORSIA Eligible Emissions Units."

Background on programme status

4.3.5.2 The Premium T-VER programme was created by the Government of Thailand in 2023, based in part on feedback from TAB's assessment of the original T-VER programme during TAB's 2019

[15] Doc 9501 — *Environmental Technical Manual*, Volume IV

assessment cycle[16]. Premium T-VER first applied for assessment by the TAB in March 2023. In November 2023, the Council accepted TAB's recommendation that Premium T-VER should be eligible for first phase (2024-2026 compliance period), pending programme's implementation of further actions requested by the Council. In April 2025, Premium T-VER submitted procedural updates for TAB's assessment and in October 2025, the Council approved Premium T-VER as immediately eligible for first phase.

4.3.5.3 In March 2026, Premium T-VER applied for TAB's assessment seeking eligibility for the 2027-2029 compliance period.

General findings

4.3.5.4 TAB found that the Premium T-VER's procedures, standards and related governance arrangements that were in place and assessed by TAB in 2026 were largely consistent with the contents of the EUC as TAB applied them in its assessments for the 2027-2029 compliance period, for emissions units generated under the programme from 1 January 2021 through 31 December 2029 that are within the programme-specific eligibility parameters set out below. This finding assumes that any limitations to the programme's eligibility scope in previous compliance period(s) that are not reiterated below nonetheless continue to apply unless a relevant procedural change has been accepted or the limitation has been superseded by a more recent and directly related decision by the Council.

4.3.5.5 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Offset Credit Issuance and Retirement Procedures —specifically in relation to this criterion's guidelines for Registry security review and the program-designated registry's public-facing elements and reports. These common findings were discussed in the TAB report of August 2025, Section 4.2 (*General Eligibility Parameters*) and in Section 4.4 (*Criteria Interpretations*). These and other findings summarized in this section informed the programme-specific eligibility parameters and further actions requested of the programme below.

4.3.5.6 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way and below the *business-as-usual* emissions projections". This common finding is further discussed in Section 4.4 of the TAB Report dated January 2023.

4.3.5.7 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Are only counted once towards a mitigation obligation and its guidelines: *Transparent communication*, in particular the programme should make publicly available any national government decisions related to accounting for units used in ICAO, including the contents of host country attestations and updated information pertaining to host country attestation as often as necessary to avoid double-claiming; and *Reconciliation of double-claimed mitigation.* TAB also noted some missing elements in the contents of host country attestations as described in the guideline *Host country attestation specifications*. These common findings were discussed in the TAB report of August 2025, Section 4.2 (*General Eligibility Parameters*) and in its Section 4.4 (*Criteria Interpretations*).

4.3.5.8 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Legal Nature and Transfer of Units in respect of procedures addressing the nature of ownership or control of emissions units contributed to a buffer risk pool, where further clarity was needed to achieve consistency with this criterion programme's procedures, for example, to identify how this relates

[16] See section 4.2.1.2 of TAB's January 2020 Report to Council

to the programme's procedures for administering the units, any conditional return of the units to the activity participant, and/or their treatment of the units in respect of the activity's cessation.

4.3.5.9 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Identification and Tracking, specifically its Guideline *Registry account screening*. TAB confirmed that T-VER does not enforce any requirement restricting registry account access to registered individuals; rather, it permits natural persons to have registry accounts. Such permissions are sometimes seen in registry systems supporting voluntary cancellations by the general public but are infrequently permitted in respect of accounts containing compliance units, where there is an anticipation of more speculative trading—so, a greater risk of problematic market practices.

Programme-specific eligibility parameters

4.3.5.10 *Scope:* Premium T-VER submitted for TAB's assessment most of its activity types and scales, unit types, methodologies and procedural categories supported by the programme. TAB recommends the following *Scope of eligibility* to be added to Part III of ICAO document titled "CORSIA Eligible Emissions Units":

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

Scope of Eligibility: Carbon Credits from the Premium T-VER Standard, including any additional certifications that:

> have been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming and
>
> for which the programme has verified, in accordance with its procedures, that the corresponding adjustment has already been applied and fully reflected in the host country's biennial transparency report (BTR).

And with the exclusion of the following activity and/or unit types, methodologies, programme elements and/or procedural classes:

a) Carbon Credits from the 'Standard T-VER' or 'JCM' standards

b) Carbon Credits issued to activities that utilize methodologies within Sectoral Scope 16: "Capture, storage, and/or utilization of greenhouse gas"

c) Carbon Credits issued to activities that utilize methodologies within the programme's Sectoral Scope 14 and are estimated[17] to generate greater than 7,000 Carbon Credits / annum individually or grouped with **these allowable exceptions**:

> T-VER-P-METH-13-04 (Mangroves/Seagrass), T-VER-P-METH-13-06 (Agriculture).

[17] According to estimates specified at the time of activity registration.

d) Carbon Credits issued to activities involving grid-connected renewable electricity generation/supply that are estimated[18] to have a maximum output capacity greater than 15 megawatts of electricity, individually or grouped.

e) Carbon Credits issued to activities using methodologies for which the programme, its methodology developers and/or activity proponents have not quantitatively demonstrated in publicly available information that the baseline(s) resulting from the standard's use are set below the business-as-usual level of emissions or, for non-traditional activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity.

Further actions requested of the programme

4.3.5.11 TAB recommends that the Council requests Premium T-VER to undertake the following further actions, which do not need to be taken prior to adding Premium T-VER to section III of the ICAO document titled "CORSIA Eligible Emissions Units":

a) Put in place procedures requiring, or for confirming, that a validator or verifier is accredited to audit the given activity scope or otherwise has the competency and sufficient technical knowledge to do so, to support the minimization of errors.

b) At the earliest convenience, introduce additional conditions or procedures for natural persons to access the Registry if doing so for purpose of buying or acquiring CORSIA Eligible Emissions Units, as needed to provide for market safeguards comparable to those intended by the guideline *Registry account screening* and inform TAB of progress made in this regard.

c) Put in place procedures requiring the programme, its methodology developers and/or activity proponents to quantitatively demonstrate in publicly available information that the baseline(s) resulting from the standard's use are set below the *business-as-usual* level of emissions or, for non-traditional activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity.

d) Clarify or put in place procedures indicating the nature of ownership or control of emissions units contributed to a buffer risk pool, for example, how this relates to the programme's procedures for administering the units, any conditional return of the units to the activity participant, and/or their treatment of the units in respect of the activity cessation.

e) Implement updates to the programme registry as necessary to fulfil the functions listed below, and to evidence such updates by re-submitting the *Programme Registry Attestation Part A* (signed), as well as the *Programme Registry Attestation Disclosure Form*, in response to a 2027 TAB call for submissions of potentially material programme change notification form, including to:

    i. enable the clear recording and tracking of information referred to in each field in Table A5-7 of Annex 16, Volume IV, taking into account the relevant guidance in the Environmental Technical Manual, Volume IV[19], preferably as discrete data that is column-separated, searchable, and downloadable—

[18] Ibid

[19] Doc 9501 — *Environmental Technical Manual*, Volume IV

including, in particular, field(s) indicating the compliance period(s) for which a batch of emissions units is eligible, the unique identifier of the account where a batch was cancelled, and the start date of the activity's first crediting period;

ii. enable the registry to generate report(s) containing the information in paragraph a) upon request of the CORSIA participant account holder or participant's designee.

iii. ensure that the information in i) is provided 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.

f) In the next revision to the programmes' procedures for the avoidance of double-claiming, for TAB's review no later than the first call for submissions of procedural changes in 2027, as needed,

i. update the programme's procedures related to the contents of host country attestations to include all contents specified in the Guideline *Host country attestation specifications*, including for the specification of the eligible CORSIA compliance period(s).

ii. confirm in written form that the programme will make publicly available any national government decisions related to accounting for units used in ICAO.

g) Upon finalization of TGO's review and update of these programme-level requirements or procedures, share the following with TAB in line with the next deadline for submitting material changes notification form:

i. sustainable development and safeguards assessment requirements, along with any accompanying updates to procedures, templates, or other requirements pertaining to MRV of the activity impacts.

ii. guidelines pertaining to the programme's management and treatment of public comments.

4.3.6 Programmes recommended for conditional eligibility

4.3.6.1 TAB recommends that the Global Carbon Council should be conditionally eligible to supply CORSIA Eligible Emissions Units for the 2027-2029 compliance period, and to request GCC to undertake the further actions described in Section 4.3.7.12 below.

4.3.7 Global Carbon Council (GCC)

Background on programme status

4.3.7.1 GCC first applied (as 'Global Carbon Trust') for assessment by the TAB in July 2019. In March 2020, the Council approved TAB's recommendation that GCC be conditionally eligible for the pilot phase (2021-2023 compliance period). Following TAB's further assessment, Council approved TAB's recommendation that GCC be fully eligible for the pilot phase in March 2021. In April 2024, GCC submitted updates to programme procedures. In October 2024, Council approved TAB's recommendation that GCC be approved as immediately eligible to supply CORSIA eligibility emissions units for the first phase (2024-2026 compliance period).

4.3.7.2 In 2026, GCC applied for assessment of eligibility for the 2027-2029 compliance period.

Criteria consistency

4.3.7.3 TAB found that GCC's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were largely consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 through 31 December 2029, pending the completion of the *Further actions requested of the programme* recommended in section 4.3.7.12 below.

4.3.7.4 TAB found that GCC demonstrated technical consistency with most, but not all, contents of the criterion Clear Methodologies and Protocols, and their Development Process. TAB noted in spot-checks of programmes methodologies that some options that were not clearly permitted at the standard-level, resulting in uncertainty regarding the programme's faithful interpretation and consistent enforcement of its higher-level standards (the primary focus of TAB's assessments) into lower-level implementing requirements, methodologies, and guidance. These and some other findings summarized in this section informed the programme-specific eligibility parameters and further actions requested of the programme below.

4.3.7.5 TAB found that GCC demonstrated technical consistency with most, but not all, contents of the criterion Programme Governance, including in relation to this criterion's guidelines for *Programme Longevity and for Programme administrator and staff conflicts of interest*. The latter was a common finding discussed in section 4.4 (Criteria Interpretations) of the TAB report dated August 2025. For GCC, TAB identified the need for further elaboration of generic terms such as "impartiality" and how these are ensured or addressed in programme procedures pertaining to administrators, staff, and private sector technical panel members, advisers, or consultants. TAB also noted that while the programme described various internal considerations and preparations for the long-term administration of multi-decadal programme elements referred to in the *Programme Longevity* guideline, this information was not consolidated in a unified written plan that comprehensively indicates how the programme has considered providing for the continuity of multi-decadal programme responsibilities and of the status and ownership of registry assets, for example a business continuity plan.

4.3.7.6 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Legal Nature and Transfer of Units, in respect of procedures addressing unit ownership in relation to the emissions reductions and/or removals (ER) represented by emissions units. Here, TAB identified that GCC and several other programmes assessed in this cycle utilized procedures that, in some circumstances, did not fully or clearly define or confirm underlying ER and activity ownership, or otherwise clearly indicate that this is not a function of the programme, its registry, and/or their respective Terms.

4.3.7.7 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria: Carbon offset programmes must generate units that represent emissions reductions, avoidance, or removals that are additional, Carbon offset credits must be based on a realistic and credible baseline, Carbon offset credits must be quantified, monitored, reported and verified, and Validation and Verification procedures. TAB noted that, while GCC's original foundations and objectives were compatible with its material reliance on tools, methodologies, and other contents developed and governed under the CDM, the CDM itself is no longer being actively governed and its resources are being incrementally integrated into the PACM (i.e., are subject to review and update). As such, GCC has indicated its timeline for the timely shift to the use of such PACM contents and/or to develop their own comparable contents, largely following PACM's lead from a timing perspective. However, GCC anticipates that this transition may not be complete until 2029. TAB also noted that several other programmes are in similar position, which has been noted and addressed incrementally by TAB throughout its assessments in some instances by inviting reapplication. However, GCC also indicated that it is developing a new tool for establishing

baselines that are below *business-as-usual*, which may be a helpful step toward resolving baseline-related concerns.

4.3.7.8 TAB found that GCC demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be quantified, monitored, reported and verified, including in relation to this criterion's guidelines for *Auditor conflict of interest*. Such procedures, including the criteria for selecting and then subsequently guiding and evaluating those providers' performance, should clearly specify the programme's expectations of the third parties' own conflict-of-interest policies and procedures, through which the programme can demonstrate consistency with the applicable Guidelines.

4.3.7.9 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Leakage. For activities that involve replacing equipment or other physical systems, this criterion addresses emissions from the replaced equipment, *e.g.,* from its disposal/decommissioning, continued use, *etc.*, where TAB identified that GCC's procedures pertaining to activities that involve replacing baseline equipment or other physical systems do not always result in the permanent disuse of baseline equipment or, if the baseline equipment remains in use, procedures for accounting deductions for emissions from its continued use that demonstrably result in an atmospheric outcome equivalent to disuse.

4.3.7.10 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Offset Credit Issuance and Retirement Procedures — specifically in relation to this criterion's guidelines for the program-designated registry's public-facing elements and reports. These common findings were discussed in the TAB report of August 2025, Section 4.2 (*General Eligibility Parameters*) and in Section 4.4 (*Criteria Interpretations*).

4.3.7.11 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Are only counted once towards a mitigation obligation, specifically regarding to the criterion's guidelines for *Host country attestation to the avoidance of double-claiming* and *Host country attestation specifications,* and particularly in relation to the sequencing of these steps described in the guideline *Host country attestation to the avoidance of double-claiming.* TAB also noted some missing elements in the contents of host country attestations, as described in the guideline *Host country attestation specifications*.

Further actions requested of the programme

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

a) Clarify or put in place procedures indicating the following:
    i. How ownership of the ERs represented by emissions units is addressed for example in the programme's and/or its registry's Terms of Use or Participation; or through the programme's up-front confirmation of the ownership of, or right to access, the land area/facility generating the emissions units and of the mitigation outcomes themselves; or through the programme's explicit clarification that ownership is not confirmed by the programme, its registry, the issuance or transfer of emissions units, etc.
    ii. The roles and responsibilities of the Board in terms of liability and enforcement.

b) in next relevant update of GCC's procedures, establish (or clarify) applicability of conflict-of-interest rules and procedures to any third parties or panels providing technical advice to the

programme in the review, update, or approval of methodologies or activities; in particular, procedures for identifying and isolating real or perceived conflicts of interest, based on clear, specific definitions of such risks, consistent with the Guidelines for Criteria Interpretation pertaining to conflicts of interest.

c) Put in place procedures and criteria for selecting or for guiding contractual obligations established with, the relevant third-party parties providing crediting registry or validation and verification services to the programme, to provide assurance that the related Guidelines for the avoidance of conflict of interest in these areas are effectively extended to and maintained by the third parties performing these functions.

d) Develop and communicate to TAB written evidence of the programme's plans for the long-term administration of multi-decadal programme referred to in the Programme Longevity guideline, preferably as a consolidated, unified written plan that comprehensively indicates how the programme has considered providing for the continuity of multi-decadal programme responsibilities and of the status and ownership of registry assets, for example a business continuity plan, which may be disclosed on a confidential basis.

e) Put in place procedures that are consistent with the Guideline for the *Leakage Compensation* for activities that wish to be CORSIA eligible, and consider the establishment of programme-level requirements for addressing leakage emissions that are sufficiently detailed or prescriptive of options (e.g. by activity type or category) that they can enable greater predictability of, and consistency across, activity design or methodological choices in relation to this risk (see Section 4.4 for further discussion about programme-versus methodology-level assessments).

f) Review, revise and put in place procedures as necessary to reduce the programme's reliance on CDM methodologies and methodological tools – such as, inter alia, those tools for which validity was dependent on their regular review and update at predefined intervals – to provide for consistency with the criteria Realistic and credible baselines, Quantified, monitored, reported and verified, and Are Additional, as well as the relevant Guidelines, including for *Conservative baseline estimation* and *Baseline revision*:
    i. A positive list/tool that can be used in lieu of the CDM positive list, which is no longer subject to periodic updates and has surpassed its validity time;
    ii. Procedures that are in development for the demonstration that baselines are set below-BAU, taking into account the TAB's requested further actions during its 2025 re-assessment of programmes requiring the programme, its methodology developers and/or activity proponents to quantitatively demonstrate in publicly available information that the baseline(s) resulting from the standard's use are set below the business-as-usual level of emissions or, for non-traditional activities (e.g. jurisdiction-scale programs, novel carbon dioxide removal), that baselines will deliver equivalent outcomes that avoid over-estimating mitigation from an activity.

In doing so, introduce processes for identifying and addressing the need for more faithful interpretation and translation of programme-level standard requirements into methodology requirements and other lower-level programme tools, methods, and guidance; for example, inter alia, where fewer methodology-specific options could be beneficial.

4.3.7.13 TAB also recommends that the Council request GCC to undertake these further actions, which would not need to be taken prior to adding GCC to Part III of the ICAO document titled "CORSIA Eligible Emissions Units":

a) implement updates to the programme registry as necessary to fulfil the functions listed below, as needed to:
    i. enable the clear recording and tracking of information referred to in each field in Table A5-7 of Annex 16, Volume IV, taking into account the relevant guidance in the Environmental Technical Manual, Volume IV , preferably as discrete data that is column-separated, searchable, and downloadable—including, in particular, field(s) indicating the compliance period(s) for which a batch of emissions units is eligible, the unique identifier of the account where a batch was cancelled, and the start date of the activity's first crediting period.
    ii. enable the registry to generate report(s) containing the information in paragraph a) upon request of the CORSIA participant account holder or participant's designee.
    iii. ensure that the information in i) is provided 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.

b) in the upcoming revision to the programmes' procedures for the avoidance of double-claiming:
    i. update programme's procedures related to the contents of host country attestations to include all contents specified in the Guideline *Host country attestation specification*s, in particular for the specification of the eligible CORSIA compliance period(s), as well as the required elements listed in decision 4/CMA.6, paragraph 5;
    ii. reincorporate provisions from previous version(s) of the programme guidance that include a host country declaration of the avoidance of double-claiming in the expected attestation contents; and
    iii. elaborate the timing and specific processes by which the programme will 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, for example to indicate the reports to be monitored and sequencing of steps to be taken by the programme;

4.3.8 **Findings and Recommendations related to the Paris Agreement Crediting Mechanism**

4.3.9 In this report, TAB recommends the Paris Agreement Crediting Mechanism (PACM) for Council's consideration as conditionally eligible to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period) and for the second phase (2027-2029 compliance period).

Background on programme status

4.3.9.1 PACM is established as per Article 6, paragraph 4 of the Paris Agreement under the authority and guidance of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA) and it is supervised by the Supervisory Body of the Article 6.4 mechanism (SBM). The PACM has been continuously governed by the Supervisory Body since 2022.

4.3.9.2 In October 2025, the UNFCCC Secretariat on behalf of the SBM, submitted an information note to ICAO, detailing information on the status of the mechanism for consideration of the ICAO Council. In 2026, TAB initiated considerations of the submitted information with the aim to report its findings to the Council regarding progress made on the PACM's operationalization, compatibility with the EUC, and readiness to supply emissions units for the first and second phases of the CORSIA. This review and the related information exchanges with the UNFCCC Secretariat took into account paragraph 20 of the Assembly Resolution 42-22 that states that "*emissions units generated from mechanisms established under the UNFCCC and its Kyoto Protocol and the Paris Agreement Crediting Mechanism (PACM) are eligible*

for use in CORSIA, provided that they align with decisions by the Council, with the technical contribution of TAB and CAEP, including on avoiding double-counting and on eligible vintage and timeframe".

4.3.9.3 TAB also considered the scope of applicability of the *CORSIA Eligible Emissions Unit Programme Registry Attestation*[20], which all CORSIA Eligible Programme administrators and their Programme-designated registry administrators are required to submit prior to facilitating the cancellation of CORSIA Eligible Emissions Units during the 2-month window when CEEUs must be cancelled for the fulfilment of participating aeroplane operators' CORSIA offsetting requirements[21]. Per decision taken during the 220th session of the Council, UNFCCC mechanism registries (the PACM Registry and the CDM Registry before it) are exempt from some requirements, consistent with the same A42-22 reference.

4.3.9.4 In August and September 2026, the mechanism submitted additional information based on questions prepared by the TAB, followed by a series of information exchanges between the TAB and the UNFCCC Secretariat to enhance TAB members' understanding of the submitted information.

General findings

4.3.9.5 TAB found that PACM's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were largely consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 through 31 December 2029, pending the completion of the *Further actions of the programme* in section 4.3.9.15.

Procedures newly developed by and for PACM

4.3.9.6 TAB found that TAB found that PACM's procedures, standards and related governance arrangements that were newly developed by and for the PACM and in place and reviewed by TAB in parallel with its 2026 assessment cycle were largely consistent with the contents of the EUC as TAB applied them in its eligibility assessments for the CORSIA second phase, 2027-2029 compliance period, for emissions units foreseen to be generated under the programme from 1 January 2026 through 31 December 2029.

4.3.9.7 TAB found that the SBM has made substantial progress toward the PACM's operationalization and readiness to certify emissions units for use toward CORSIA. The status of these developments is summarized in Section 6. Notable developments span a range of new rules, regulations, and tools for, *inter alia*, implementing the activity cycle; developing and using PACM methodologies; avoiding or mitigating activities' social and environmental risks; identifying and monitoring PACM activities' positive and negative impacts; requirements of host Parties; and various fundamental requirements for activity development, credit issuance, and the implementation of accounting and reporting requirements consistent with the guidance for cooperative approaches referred to in Article 6.2 of the Paris Agreement.

4.3.9.8 TAB found that programme requirements newly developed by and for the PACM demonstrated technical consistency with some, but not all, contents of the criteria relating to emissions unit

[20] https://www.icao.int/sites/default/files/environmental-protection/CORSIA/TAB/2026/Appendix_D_Emissions-Unit-Programme-Registry-Attestation_Sep2026.docx

[21] Participating airlines are required to cancel CEEUs for compliance in the year after the relevant compliance period concludes—for the 2024-2026 compliance period, this will take place 1 December 2027–31 January 2028, as specified in Annex 16, Volume IV, Appendix 1, Table A1-4.

programme registries[22]. Throughout TAB's review, the PACM Registry was not yet operational. The PACM's interim solution was not found to perform the functions necessary for airlines to fulfil the requirements for identifying and transparently cancelling emissions units and reporting these cancellations in line with Annex 16, Volume IV. This finding formed the basis for the recommended *Further actions requested of the programme*, below.

4.3.9.9 TAB found that some programme requirements newly developed by and for the PACM demonstrated technical consistency with some, but not all, contents of the criteria Programme governance; Permanence; Safeguards Systems; and Leakage. This finding specifically relates to activities involving removals, where some foundational elements remained under development, such that TAB was not yet able to conclude and report its findings. These elements include the reversal risk assessment tool(s); provisions for operationalizing a reversal risk buffer pool; dedicated social and environmental safeguards for forestry and land use (AFOLU) activities and activities involving CO2 storage; dedicated guidance and procedures related to leakage emissions and "nesting" of AFOLU activities; and considerations of procedures for programme exit in relation to PACM's long-term, post-crediting period monitoring requirements. TAB recommends that the Council should not enable the use of units from these types of activities until the procedures are finalized and TAB can assess their consistency with the EUC and inform the Council of their readiness status.

Procedures applicable to CDM activities transitioning to PACM

4.3.9.10 TAB also assessed programme requirements that have been implemented by the SBM to enable the transition of qualifying activities that were previously registered under the Clean Development Mechanism (CDM). TAB focused on procedures that apply to qualifying transitioning CDM activities that can issue emissions units for emissions reductions generated in 2021–2025, prior to their re-validation based on new PACM methodologies and requirements. Such activities are able to generate emissions units based on their existing baselines/methodologies and without undergoing further additionality testing or re-validation. They are otherwise required to meet or apply most other PACM requirements, including any new requirements that the SBM adopts in the future for application to both new PACM activities and transitioning CDM activities. TAB found that some PACM requirements of transitioning CDM activities rendered them more consistent with the EUC, as compared to TAB's findings from its previous assessments of CDM on a standalone basis.

4.3.9.11 Some core CDM requirements remain in effect throughout the transition period, some of which TAB previously reported to the Council as meeting some but not all EUC. TAB considered this finding in relation to updates to the Guidelines that were approved by the Council for use in TAB's assessment of programmes for eligibility in the 2027–2029 period. TAB found that, in some instances, the combination of new PACM requirements and legacy CDM requirements applicable to transitioning CDM activities improved their consistency with the contents of several EUC as TAB applied them in its eligibility assessments for the CORSIA first phase, 2024-2026 compliance period, such as the criterion Sustainable Development Criteria.

4.3.9.12 TAB found that the requirements of transitioning CDM activities demonstrated technical consistency with some, but not all, contents of the criterion Are Additional. As noted in previous TAB Reports, the CDM did not have procedures in place to comprehensively ensure that the credited emissions

[22] Criterion Identification and Tracking and its guidelines *Registry use*, *Unit identification*, *Unit transfer and tracking, Unique serialization, Registry administration conflict of interest, Registry account screening, and Registry security review*.

reductions "…*exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate*". Until recently, this procedure was typical of programmes that were modelled after the CDM, at least in their early stages. In 2020, based on TAB recommendations, the Council decided that emissions units certified on this basis should be eligible for use under the pilot phase. In 2022, the Council decided that only programmes that demonstrated full consistency with this criterion should be eligible for use under the CORSIA first phase. New PACM additionality requirements are fully consistent with this criterion, but do not apply to transitioning CDM activities. TAB is unable to determine the number of transitioned activities and volumes of units that were generated based on this exception and are encompassed under this recommendation.

4.3.9.13 TAB found that the requirements of transitioning CDM activities demonstrated technical consistency with some, but not all, contents of the criterion Permanence. TAB's previous assessments found that the CDM's approach to temporary crediting, as a measure to compensate for the potential reversal of emissions reductions from afforestation or reforestation activities, was technically incompatible with the use of these units in CORSIA. Until PACM adopts complete procedures addressing this risk, in respect of both transitioning and new CDM activities in this category, TAB noted that units from this activity type must be explicitly excluded from the programme's eligibility scope.

4.3.9.14 TAB found that the requirements of transitioning CDM activities demonstrated technical consistency with some, but not all, contents of the criteria Safeguards System and Sustainable Development Criteria. TAB found that the PACM's Sustainable Development Tool (SD Tool) involves extensive requirements for identifying, mitigating, monitoring, reporting, and verifying an activity's positive and negative social and environmental impacts across a wide range of indicators—and on a mandatory basis. The availability and use of this tool represent a meaningful improvement on the CDM's comparably simple SD Tool, the use of which was voluntary; not subject to ongoing MRV; and not designed to provide accountability for an activity's environmental and social risks. However, CDM activities that transitioned to PACM before the use of PACM's SD Tool became mandatory for transitioning activities (from 11 February 2025). Prior to that date, such activities were required to use the CDM SD Tool and are not required to retroactively apply the PACM's new SD Tool.

Further actions requested of the programme

4.3.9.15 TAB recommends that the Council request PACM to undertake the further actions described in para. (a) below, which are necessary for the programme to facilitate CEEU cancellations for the fulfilment of participating airlines' compliance offsetting requirements in line with Annex 16, Volume IV, or are otherwise recommended to promote compatibility with decisions by Council pertaining to Eligible Emissions Units Programme Registry Requirements and emissions units that are eligible for the 2024–2026 and 2027–2027 CORSIA compliance periods. TAB will expeditiously review any further information shared by the PACM in this regard and make recommendations to Council as necessary to inform its decisions on operationalizing the eligibility of emissions units issued under the PACM:

a) Operationalization of the PACM Registry, or an interim registry solution if necessary to facilitate emissions unit cancellations for the 2024–2026 compliance period, in a manner that demonstrates the full capability to facilitate cancellations of CEEUs for the fulfilment of participating airlines' offsetting requirements under CORSIA in line with Annex 16, Volume IV, including the registry-related contents of the ICAO Documents titled *CORSIA Emissions Units Criteria* and *CORSIA Eligible Emissions Units*, as well as the requirements contained in the *CORSIA Eligible Emissions Unit Programme Registry Attestation*.

4.3.9.16 TAB also recommends that the Council request PACM to provide further information to TAB regarding the requirements for activities involving removals, particularly upon finalization of the elements noted in paragraph 4.3.9.13.

4.3.10 Programme invited to re-apply

4.3.10.1 In this report, TAB recommends that the following programmes be invited to submit an application for TAB's assessment to supply CORSIA Eligible Emissions Units for the CORSIA's second phase, 2027-2029 compliance period:

- Building Emissions Reduction Standard (see details in Section 4.3.11)
- C-Capsule & Absolute Climate (see details in Section 4.3.12)
- Equitable Earth (see details in Section 4.3.13)
- Global C-Sink Standards (see details in Section 4.3.14)
- International Carbon Registry (see details in Section 4.3.15)
- KCS Program (see details in Section 4.3.16)
- Planet First Registry (see details in Section in Section 4.3.17)
- Open Carbon Protocol (see details in Section 4.3.18)
- ORMEX (see details in Section 4.3.19)
- Voluntary GHG Reduction System of the Russian Federation (see details in Section 4.3.20)

4.3.11 Building Emissions Reduction Standard

4.3.11.1 TAB recommends that eligibility decisions regarding Building Emissions Reduction Standard should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.12 C-Capsule & Absolute Climate

4.3.12.1 TAB recommends that eligibility decisions regarding C-Capsule & Absolute Climate should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.13 **Equitable Earth**

4.3.13.1 TAB recommends that eligibility decisions regarding Equitable Earth should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.14 **Global C-Sink Standards**

4.3.14.1 TAB recommends that eligibility decisions regarding Global C-Sink Standards should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.15 **International Carbon Registry**

4.3.15.1 TAB recommends that eligibility decisions regarding the International Carbon Registry should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.16 **KCS Program**

4.3.16.1 TAB recommends that eligibility decisions regarding KCS Program should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.17 **Planet First Registry**

4.3.17.1 TAB recommends that eligibility decisions regarding Planet First Registry should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January

2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.18 Open Carbon Protocol

4.3.18.1 TAB recommends that eligibility decisions regarding Open Carbon Protocol should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.19 ORMEX

4.3.19.1 TAB recommends that eligibility decisions regarding ORMEX should not be taken at this time. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.20 Voluntary GHG Reduction System of the Russian Federation

4.3.20.1 TAB recommends that Voluntary GHG Reduction System of the Russian Federation should be invited to re-apply to supply CORSIA Eligible Emissions Units for the 2027-2029 compliance period. TAB found that the programme's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2026 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards. TAB would like to encourage the programme to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all the EUC. TAB will assess the programme again once changes to the programme procedures are in place, and the programme provides such information to TAB in line with a future call for applications.

4.3.21 Applicant not possible to assess

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

1. BCarbon (see details in Section 4.3.22)
2. Coalition for Rainforest Nations (see details in Section 4.3.23)
3. Zimbabwe Carbon Markets Authority (see details in Section 4.3.24)

4.3.22 **BCarbon**

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

4.3.23 **Coalition for Rainforest Nations**

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

4.3.24 **Zimbabwe Carbon Markets Authority**

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

4.3.25 **Programmes that remain under assessment for eligibility of 2027-2029 compliance period**

4.3.25.1 In its Terms of Reference (ToR) adopted by Council, TAB is tasked to "undertake the assessment of emissions unit programmes (and potentially project types) against the emissions units criteria, applying TAB procedures and guidelines for applying the emissions unit criteria (hereinafter referred to as "TAB Procedures").

4.3.25.2 In line with the above, TAB launched a call for applications for assessment in February 2026 with the aim of presenting recommendations on this matter to Council during the 239th session and TAB incorporated the assessment in its 2026 Work Programme and Timeline, while noting that it could be subject to further changes.

4.3.25.3 In March 2026, 25 organization responded to the call for applications for TAB's assessment of eligibility for the CORSIA 2027-2029 compliance period. It is important to note that this was the largest number of organizations to ever respond to a call for applications for TAB assessments. In addition, in 2026 TAB also initiated the consideration of the information note submitted in 2025 by the UNFCCC Secretariat detailing the PACM, with the aim to report the results of these considerations to the Council at is 239th session. TAB also received material changes submissions from eight eligible programmes in April 2026.

4.3.25.4 Due to the high number of organizations under assessment in 2026, TAB has needed extra hours to advance the work and in a manner that maintains the established procedures for assessment. TAB initiated its assessment work in March 2026, which included exchanging three rounds of clarification questions between June and August, conducting live discussions with each of these 26 organizations in July and August, and preparing individual programme assessments. The TAB also extended its fall meeting to seven days with the aim to cover all the information received from the programmes.

4.3.25.5 Recognizing the importance of conducting a thorough assessment and finalizing technically sound recommendations for each organization, during its 24th meeting TAB identified the need to divide its workload into two phases. In this report, TAB presents recommendations on the majority of applicants, as well as its findings regarding the PACM.

4.3.25.6 TAB will continue its assessment of the remaining seven emissions unit programmes throughout the fall of 2026, with the aim to conclude these 2026 assessments at its 25th meeting (January 2027) and to report its second set of recommendations on eligibility for the CORSIA 2027-2029 compliance period to the 240th session on the ICAO Council (March 2027). The following programmes will remain under assessment: BioCarbon Standard, Cercarbono, Climate Action Reserve, COLCX, Puro Program, PV Climate and Rainbow.

4.3.26 Future call for applications for the CORSIA second phase, 2027-2029 compliance period

4.3.26.1 Programmes not yet fully eligible for the 2027–2029 compliance period of CORSIA's second phase are invited to newly apply or to re-apply in early 2027 for TAB's 2027 assessment cycle. TAB aims to present its recommendations thereon in October/November 2027.

4.3.27 TAB recommendations on other material change notifications

4.3.27.1 In April 2026, eight programmes submitted potentially material procedural updates individually or as part of their 2026 applications.

4.3.27.2 TAB found that six submissions were immaterial changes compared to previously assessed procedures or, in relevant instances, TAB integrated the information into its 2026 assessment materials:

- American Carbon Registry
- BioCarbon Fund Initiative for Sustainable Forest Landscapes
- Climate Action Reserve
- Forest Carbon Partnership Facility
- Isometric
- Premium T-VER

4.3.27.3 TAB is continuing to review some procedural changes reported by these programmes and, in October 2026, will update each programme regarding further progress made, any additional clarifying questions, and the timeline for completion of these checks:

- Gold Standard (changes 6-13)
- Verified Carbon Standard (changes 1-2, 9-10, 12, 14-15)

4.4 CRITERIA INTERPRETATIONS

4.4.1 Background

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

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

4.4.2 **Topic: General**

Guiding Principles for TAB's Assessment

4.4.2.1 In its assessments, TAB takes account of the instructions or definitions contained in *TAB Terms of Reference* paragraph 2.1(1), the Emissions Units Criteria (EUC), and *TAB Procedures* defining the EUC and containing *Guiding Principles for TAB's Assessment*. These contents direct TAB to focus its assessments on programmes (and potentially project types).

4.4.2.2 In practice, an assessment of programme-level alignment with the EUC and *Guidelines for Interpretation* involves, at a minimum, reviewing the programme's standards and any overarching guidance documents that inform how other, more granular or specific rulesets are developed and applied, irrespective of the focus of those more targeted rulesets (e.g., specific activity or mitigation outcome types, sectors, industries, geographies, etc.).

4.4.2.3 Beyond a programme's overarching standard, many other procedures, elements, and systems assessed by TAB are typically established at the programme-level, *inter alia*, the programme's designated crediting registry and its requirements; any universal guidance for eligibility, programme scope, and quantification and MRV tools and templates; procedures and systems for facilitating and addressing public comments, stakeholder consultations, and/or appeals and grievances; accreditation and validation and verification requirements; etc.

4.4.2.4 TAB Procedures paragraph 7.9.— *Guiding Principles for TAB's Assessment*—further explains, *"The programme procedures in place to ensure the programme meets a certain criterion can exist on different levels, and so TAB's assessment may also involve varying levels of assessment of how a requirement and/or procedure is, e.g., implemented by the programme itself; and/or is operationalized in a given methodology under the programme; and/or how the programme or activities it supports interface with the host country…*" TAB's assessments typically require members to check and confirm that statements made in an application form accurately represent underlying procedures, as well as that those programme-level procedures are faithfully applied in lower-level rulesets as relevant and as evidenced in approved methodologies, PDDs, registry systems, expert group composition, etc.

4.4.2.5 These checks are performed so that, once an eligible programme's high-level procedures are confirmed to be consistent with the EUC, ICAO can generally trust that any further decisions taken by the programme or any new or revised programme elements will remain consistent with those requirements, without requiring frequent disclosure to and review by TAB. Even the rare instances of truly material changes must be traced back to the high-level procedures that were originally assessed by TAB.

4.4.2.6 In its assessment, TAB noted that some programmes prefer to tailor their methodological requirements, safeguards, and other EUC-relevant procedures to each methodology., such that methodologies—so, activity design and implementation—are not guided by any standard-level requirements that are strictly or consistently applied across methodologies. This decentralized model prevents TAB from assessing programmes within the timeframe of a given assessment cycle or, in some cases, it is not possible to assess the programme based on the level at which the EUC were written and intended to be applied by TAB.

4.4.2.7 TAB noted the importance of informing prospective applicants of the programme-level nature of EUC and of TAB's assessments, to support clear applications, productive assessments, and beneficial outcomes for CORSIA and for programmes.

4.4.3 **Criterion: <u>Legal Nature and Transfer of Units</u>**

4.4.3.1 TAB noted the work of a growing number of host countries and national and multilateral institutions to define and/or regulate emissions units' legal nature; taxation; arrangements for transparent unit transactions or contractual arrangements; or rights to the underlying GHG mitigation outcomes. TAB's recent assessments have considered the compatibility of programme and programme registry procedures and Terms with such emerging policy developments, particularly those that could have implications for host countries' willingness or ability to authorize the use of emissions units toward CORSIA in the future.

4.4.3.2 TAB's assessments have increasingly emphasized the importance of programmes' attention to and consistency with this criterion, including programme procedures that indicate, e.g.,

- *how unit ownership is addressed*, for example through the programme's up-front confirmation of the ownership of or right to access the land area/facility generating the emissions units and/or the mitigation outcomes that are presented by the emissions units; or through the programme's explicit clarification that ownership is not considered or conferred by the programme, its registry, the issuance or transfer of emissions units, etc.

- the nature of ownership or control of emissions units contributed to a reversal risk buffer pool, for example how this relates to the programme's procedures for administering the units, any conditional return of the units to the activity participant, and/or their treatment of the units in respect of the activity's cessation.

4.4.4 **Criterion: <u>Governance</u> | Guidelines regarding Conflicts of interest (various):** Guidelines 2.4.6 (*Registry administrator conflicts of interest*) | 2.7.3 (*Programme administrator and staff conflicts of interest*) | 3.3.3. (*Auditor conflicts of interest*)

4.4.4.1 TAB notes that the considerations given to experts supporting programme work, as summarized in the August 2025 TAB Report, are similarly applicable to any third parties providing crediting registry or validation and verification services to the programme. This observation pertains to the programmes' procedures and criteria for selecting, or contractual obligations established with, those third parties. TAB found that some programmes' very generic contractual references or criteria pertaining to conflicts of interest provided inadequate confidence that these *Guidelines* will be effectively extended to and maintained by the third parties performing these functions (e.g., "*must have procedures addressing… impartiality / conflicts of interest.*"). This finding is addressed in the findings and any *Further Actions* requested of some programmes in this report.

4.4.5 **Criterion: <u>Permanence</u> | *Guidelines 3.5.4: Extent of compensation provisions***

4.4.5.1 The Guideline for Criteria Interpretation *Extent of compensation* provisions states, *"The programme should 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."* TAB affirms that a material reversal of mitigation issued as emission units and used towards offsetting obligations under the CORSIA requires remediation. In relation to this, the phrase "*fully eligible"* could be interpreted as meaning that the underlying emissions units cancelled for compensation must be (1) certified by the eligible emissions units programme for their verified atmospheric benefits, as well as (2) align with the programme's *Scope of Eligibility* in the ICAO document "*CORSIA Eligible Emissions Units*", including that they are (3) covered by a letter of authorization by the relevant host country.

4.4.5.2 However, the underlying stored emissions subject to the reversal were already covered by a letter of authorization by the relevant host country, which applies an accounting adjustment to prevent them from being claimed both by the host country (toward implementing its Paris Agreement emissions targets) and by an airline (toward its offsetting obligations under CORSIA). TAB noted that emissions units contained in a buffer risk pool that are used to remediate a reversal do not also need to be authorized—so, subject to another corresponding adjustment—by the host country because they are not being used toward CORSIA compliance, or by any entity, such that could be double-claimed.

4.4.5.3 Rather, emissions units used for compensation of a reversal are intended to maintain the environmental integrity of the underlying removals for which units were issued. These units are cancelled or retired according to the rules of the programme; they are never transferred to or used by an airline or any other entity to offset emissions. Moreover, buffer risk pools are designed to ensure that a reversal of GHG mitigation that previously counted toward the host country's emissions targets are compensated by the cancelled unit.

4.4.5.4 TAB thus clarified that the meaning of "fully eligible" for use under the CORSIA in this context should be interpreted as buffer-pooled emission units that align with all relevant elements of a programme's *Scope of Eligibility*, with the exception of the requirements related to host country authorization and accounting, which is unnecessary for these to effectively preserve climate benefits of any associated CORSIA Eligible Emissions Units.

— END —