

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

**Application Form for Emissions Unit Programmes**

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## **SECTION I: ABOUT THIS ASSESSMENT**

### **Background**

ICAO Member States and the aviation industry are implementing the Carbon Offsetting and Reduction Scheme for International Aviation (CORSA). Together with other mitigation measures, CORSA will help achieve international aviation's aspirational goal of carbon neutral growth from the year 2020.

Aeroplane operators will meet their offsetting requirements under CORSA by purchasing and cancelling CORSA eligible emissions units. The ICAO Council determines CORSA eligible emissions units upon recommendations by its Technical Advisory Body (TAB) and consistent with the CORSA Emissions Unit Eligibility Criteria (EUC).

In March 2019, the ICAO Council unanimously approved the CORSA Emissions Unit Eligibility Criteria for use by TAB in undertaking its tasks<sup>1</sup>. TAB conducted its first cycle of assessment in 2019, and its recommendations were considered by the Council in March 2020.

Now, ICAO invites emissions unit programmes<sup>2</sup> to apply for the second cycle of assessment by the TAB, which will involve collecting information from each programme through this programme application form and supplementary materials and requested evidence.

Through this assessment, the TAB will develop recommendations on the list of eligible emissions unit programmes (and potentially project types) for use under the CORSA, which will then be considered by the ICAO Council.

This form is accompanied by, and refers to, Appendix A “*Supplementary Information for Assessment of Emissions Unit Programmes*”<sup>3</sup>, containing the EUC and *Guidelines for Criteria Interpretation*. These EUC and Guidelines are provided to inform programmes' completion of this application form, in which they are cross-referenced **by paragraph number**.

This form is also accompanied by Appendix B “*Programme Assessment Scope*”, and Appendix C “*Programme Exclusions Scope*”, which request all applicants to identify the programme elements<sup>4</sup> they wish to submit for, or exclude from, TAB's assessment.

This form also requests *evidence of programme procedures or programme elements*. These evidentiary documents enable TAB to a) confirm that a given procedure or program element is *in place*, b) more fully comprehend the programme's summary responses, and c) archive the information as a reference for potential future assessments.

Programme responses to this application form will serve as the primary basis for the assessment. Such assessment may involve e.g. clarification questions, live interview(s) with TAB, and a completeness check of the application, as further requested.

**Translation:** The working language of the assessment process is English. Translation services are not available for this process. If the programme documents and information are not published in English, the programme should fully describe in English (*rather than summarize*) this information in the fields provided in this form, and in response to any additional questions. Where this form requests *evidence of programme procedures*, programmes are strongly encouraged to provide these documents in English, to provide for accuracy and comprehension. Where this is not possible due to time constraints or document

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

<sup>2</sup> “Emissions Unit Programme”, for the purposes of TAB's assessment, refers to an organization that administers standards and procedures for developing activities that generate offsets, and for verifying and “issuing” offsets created by those activities. For more information, please review the TAB FAQs on the ICAO CORSA website: <https://www.icao.int/environmental-protection/CORSA/Pages/TAB.aspx>

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

<sup>4</sup> At the “activity type” level (e.g., sector(s), sub-sector(s), and/or project “type(s)”)

length, the programme may provide such documents in their original language in a readily translatable format (e.g., Microsoft Word). Those programmes that need to translate documents prior to submission may contact the ICAO Secretariat regarding accommodation.

**Disclaimer:** The information contained in the application, and any supporting evidence or clarification provided by the applicant including information designated as “business confidential” by the applicant, will be provided to the members of the TAB to properly assess the programme and make recommendations to the ICAO Council. The application and such other evidence or clarification will be made publicly available on the ICAO CORSIA website for the public to provide comments, except for information which the applicant designates as “business confidential”. The applicant shall bear all expenses related to the collection of information for the preparation of the application, preparation and submission of the application to the ICAO Secretariat and provision of any subsequent clarification sought by the Secretariat and/or the members of the TAB. Under no circumstances shall ICAO be responsible for the reimbursement of such or any other expenses borne by the applicant in this regard, or any loss or damages that the applicant may incur in relation to the assessment and outcome of this process.

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## **SECTION II: INSTRUCTIONS**

### **Submission and contacts**

A programme is invited to complete and submit the form, and accompanying evidence, through the ICAO CORSIA website no later than close of business on **20 April 2020**. Within seven business days of receiving this form, the Secretariat will notify the programme that its form was received.

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

### **Form basis and cross-references**

Questions in this form are derived from the CORSIA emissions unit eligibility criteria (EUC) and any *Guidelines for Criteria Interpretation* introduced in Section I (above). To help inform the programme's completion of this form, each question includes the paragraph number for its corresponding criterion or guideline that can be found in [Appendix A “Supplementary Information for Assessment of Emissions Unit Programmes”](#).

### **Form completion**

The programme should respond to all questions in this application form. A “complete” response involves three components: a) a written summary response, b) selection of the “YES” check box if a procedure is fully *in place*, and c) supporting evidence.

- a) **Written summary responses:** The programme is encouraged to construct written summary responses in a manner that provides for general comprehension of the given programme procedure, independent of supporting evidence. TAB will confirm each response in the supplementary evidence provided by the programme. Please note that written summary responses should be provided in all cases—supporting evidence (described in *c*) below) should not be considered as an alternative to a complete summary response.
- b) **“YES” check box:** Each question is accompanied by a check box for the programme to indicate the status of a given procedure or programme element. Here, programmes should accurately represent the status of its procedures and programme elements. Please note that an unselected check box does not, in itself, disqualify an application from further assessment; it will be taken into account when TAB reviews the programme's accompanying information.

The programme *should* select the “YES” check box if a procedure or element is *in place*.

The programme *should not* select the check box in the following instances:

1. The procedure in question is *not relevant to the programme's application* (if, e.g., the question applies to activity(ies) that the programme is not submitting for assessment, or an alternative approach is taken to the procedure or element in question). In such cases, please provide justification in the written summary response.
  2. The procedure in question *is not yet in place, but the programme is planning to introduce such a procedure*. In such cases, please describe any such plans in the written summary response, according to form instructions.
  3. The procedure in question *is not in place*. In such cases, please provide justification in the written summary response.
- c) **Supporting evidence:** Most questions in this form request *evidence of programme procedures or programme elements*. Such evidence may be found in programme standards, requirements, or guidance documents; templates; programme website or registry contents; or in some cases, in specific methodologies. To help manage file size, the programme should limit supporting documentation to that

which directly substantiates the programme's statements in this form.

Regarding such requests for evidence, programmes can substantiate their responses in any of these ways (**in order of preference**):

1. web links to supporting documentation included along with the written summary response; with instructions for finding the relevant information within the linked source, if necessary;
2. copying/pasting information directly into this form (no character limits) along with the written summary response;
3. attaching supporting documentation to this form at the time of submission, with instructions for finding the relevant information within the attached document(s);

### **Form scope**

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

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

In **Appendix C "Programme Exclusions Scope"**, the programme should clearly identify, at the "activity type" level (e.g., sector(s), sub-sector(s), and/or programme/project "type(s)"), any elements the programme **is not submitting for TAB's assessment** of CORSIA eligibility, which *are not* described in this form; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements.

### **Programme revisions**

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

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

### **"Linked" certification schemes**

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

Some programmes may supplement their standards by collaborating with other schemes that certify, e.g., the social or ecological "co-benefits" of mitigation. The programme can reflect a linked scheme's procedures in responses to this form, where this is seen as enhancing—i.e. going "above and beyond"—the programme's own procedures.

For example, the programme may describe how a linked scheme audits sustainable development outcomes; but is not expected to report the linked scheme's board members or staff persons.

Programmes should clearly identify any information provided in this form that pertains to a linked certification scheme and/or only applies when a linked certification scheme is used.

## **Disclosure of programme application forms**

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

The public will be invited to submit comments on the information submitted, including regarding consistency with the emissions unit criteria (EUC), through the ICAO CORSIA website, for consideration by the TAB in its assessment.

## **SECTION III: APPLICATION FORM**

### **PART 1: General information**

#### **A. Programme Information**

Programme name:	<input type="text" value="Olkaria IV Geothermal Project"/>
Administering Organization <sup>5</sup> :	<input type="text" value="Kenya Electricity Generating Company PLC"/>
Official mailing address:	<input type="text" value="pr@kengen.co.ke"/>
Telephone #:	<input type="text" value="+254 020 366 6000 / +254 711 036 000"/>
Official web address:	<input type="text" value="https://www.kengen.co.ke"/>

#### **B. Programme Administrator Information**

Full name and title:	<input type="text" value="Rebecca Miano (MRS.), MBS"/>		
Employer / Company (if not programme):	<input type="text" value="Kenya Electricity Generating Company PLC"/>		
E-mail address:	<input type="text" value="rmiano@kengen.co.ke"/>	Telephone #:	<input type="text" value="+254 711 036 801"/>

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

Full name and title:	<input type="text" value="Mr. Joshua Were"/>		
Employer / Company (if not Programme):	<input type="text" value="Kenya Electricity Generating Company PLC"/>		
E-mail address:	<input type="text" value="jwere@kengen.co.ke"/>	Telephone #:	<input type="text" value="+254 711 036 536"/>

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

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

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

<https://www.dropbox.com/sh/gb16nn5qimulesw/AABrw2xNoZWask6y5KDZrZ6Qa?dl=0>

<sup>5</sup> Name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme, if different from "Programme Name".

## **PART 2: Programme summary**

Provide a summary description of your programme

Olkaria IV Geothermal Project (also known as Olkari Domes), is a project Owned by Kenya Electricity Generating Company PLC (KenGen). The objective of the project is to add about 1,128,288 MWh per year of geothermal-generated electricity to the Kenya national grid system through installation of two turbine generators with a net generation of 70MW per unit. The project is a greenfield renewable energy project which will utilise steam collected from geothermal wells for electricity generation.

The project activity results in greenhouse gas (GHG) emission reductions by displacing fossil fuel-dominated electricity generation in the Kenyan grid with renewable geothermal power.

The project was registered as a CDM project with the crediting of 7 years renewable twice. Start of the crediting period is September 1, 2014. The project location is; -0.916 and 36.335

The project contributes to national sustainable development through the following:

**Sustainable clean energy:** The provision of renewable clean hydroelectricity is a major factor contributing to sustainable development in Kenya through improved environmental quality, positive health impacts and increased productivity. Also, increased power availability will create more opportunities for expanded rural electrification with far reaching impacts on job creation and improved livelihoods in the rural areas.

**Decreased dependence on fossil fuels:** Hydropower generation has been a major component of Kenya's energy strategy. The project will make positive contribution to the country's implementation of its energy strategy which aims to reduce energy from thermal sources and increase energy from renewable sources. With the project assisting the country to facilitate utilization of renewable energy resources such as hydropower, Kenya's dependence on imported crude petroleum can be reduced significantly

**Assistance in community programs:** While the sale of the CERs generated by the project will boost production of clean energy in the country, it will also assist poor rural communities in the project area through implementing community programs funded by carbon revenues.



### PART 3: Emissions Unit Programme Design Elements

*Note*—where “evidence” is requested throughout *Part 3* and *Part 4*, the programme should provide web links to documentation. If that is not possible, then the programme may provide evidence of programme procedures directly in the text boxes provided (by copying/pasting the relevant provisions) and/or by attached supporting documentation, as recommended in “SECTION II: INSTRUCTIONS—*Form Completion*”.

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

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

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

#### Question 3.1. Clear methodologies and protocols, and their development process

Provide *evidence*<sup>6</sup> that the programme’s qualification and quantification methodologies and protocols are *in place* and *available for use*, including where the programme’s existing methodologies and protocols are publicly disclosed: (*Paragraph 2.1*)

A link is shared to the CDM Project registry for this project showing that this project is a CDM registered project <https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/view>

The project’s development documents (PDD) submitted to the CDM-UNFCCC website is attached in the following link [https://cdm.unfccc.int/filestorage/g/s/CNUDEWM3VTYP91GBOZQ7XJA8HIS240.pdf/Olkaria%20IV%20Geothermal%20Power%20Project\\_PDD%20ver03.pdf?t=b0p8cThydG42fDB-kpEZ9Sik1htK0FQ\\_Y6Gt](https://cdm.unfccc.int/filestorage/g/s/CNUDEWM3VTYP91GBOZQ7XJA8HIS240.pdf/Olkaria%20IV%20Geothermal%20Power%20Project_PDD%20ver03.pdf?t=b0p8cThydG42fDB-kpEZ9Sik1htK0FQ_Y6Gt)

Summarize the programme’s process for developing further methodologies and protocols, including the timing and process for revision of existing methodologies: (*Paragraph 2.1*)

The program is a renewable energy project that displaces the use of fossil fuels in Kenyan grid. The project uses consolidated baseline methodology for grid-connected electricity generation from renewable sources (ACM0002) version 13. The project use a 7 year renewable twice crediting period. The methodology will be upgrade to the latest version when the crediting period expires.

Provide *evidence of the public availability* of the programme’s process for developing further methodologies and protocols: (*Paragraph 2.1*)

[https://cdm.unfccc.int/filestorage/g/s/CNUDEWM3VTYP91GBOZQ7XJA8HIS240.pdf/Olkaria%20IV%20Geothermal%20Power%20Project\\_PDD%20ver03.pdf?t=b0p8cThydG42fDB-kpEZ9Sik1htK0FQ\\_Y6Gt](https://cdm.unfccc.int/filestorage/g/s/CNUDEWM3VTYP91GBOZQ7XJA8HIS240.pdf/Olkaria%20IV%20Geothermal%20Power%20Project_PDD%20ver03.pdf?t=b0p8cThydG42fDB-kpEZ9Sik1htK0FQ_Y6Gt)

<https://cdm.unfccc.int/methodologies/DB/XP2LKUSA61DKUQC0PIWPGWDN8ED5PG>

#### Question 3.2. Scope considerations

Summarize the level at which activities are allowed under the programme (e.g., project based, programme of activities, jurisdiction-scale): (*Paragraph 2.2*)

Activities in the program is project based anchored on grid-connected electricity generation from renewable sources of which the jurisdiction is the Kenyan Grid. The project qualifies as large scale in scope.

<sup>6</sup> For this and subsequent “evidence” requests, evidence should be provided in the text box (e.g., web links to documentation), and/or in attachments, as recommended in “SECTION II: INSTRUCTIONS—*Form Completion*”.

Summarize the eligibility criteria for each type of offset activity (e.g., which sectors, project types, and geographic locations are covered): (*Paragraph 2.2*)

The project falls under the energy sector (grid connected electricity generation from renewable sources). The project harnesses electricity through geothermal electricity generation. The project covers Kenya's jurisdiction through the Kenya Grid.

Provide *evidence* of the Programme information defining a) level at which activities are allowed under the Programme, and b) the eligibility criteria for each type of offset activity, including its availability to the public: (*Paragraph 2.2*)

<https://cdm.unfccc.int/methodologies/DB/XP2LKUSA61DKUQCOPWPGWDN8ED5PG>

### Question 3.3. Offset credit issuance and retirement procedures

Are procedures in place defining how offset credits are... (*Paragraph 2.3*)

- a) issued? yes  YES
- b) retired / cancelled? yes  YES
- c) subject to discounting (*if any*)?  YES

Are procedures in place defining... (*Paragraph 2.3*)

- d) the length of crediting period(s)? yes  YES
- e) whether crediting periods are renewable?  YES

Provide evidence of the procedures referred to in a) through e) (if any, in the case of "c"), including their availability to the public:

<https://cdm.unfccc.int/Projects/pac/howto/CDMProjectActivity/Issuance/index.html>

<https://unfccc.int/about-us/partnerships/current-calls-for-partnerships/integration-with-the-un-platform-for-voluntary-cancellation-of-cers#eq-2>

<https://cdm.unfccc.int/Registry/index.html>

<https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/view>

### Question 3.4 Identification and Tracking

Does the programme utilize an electronic registry or registries? (*Paragraph 2.4.2*)  YES

Provide web link(s) to the programme registry(ies) and indicate whether the registry is administered by the programme or outsourced to a third party (*Paragraph 2.4.2*):

<https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/view>

Does the programme have procedures in place to ensure that the programme registry or registries...:

- a) have the capability to transparently identify emissions units that are deemed ICAO-eligible, in all account types ? (*Paragraph 2.4.3*)  YES

- b) identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement? (*Paragraphs 2.4 (a) and (d) and 2.4.4*)  YES
- c) identify unit status, including retirement / cancellation, and issuance status? (*Paragraph 2.4.4*)  YES
- d) assign unique serial numbers to issued units? (*Paragraphs 2.4 (b) and 2.4.5*)  YES
- e) identify in serialization, or designate on a public platform, each unique unit's country and sector of origin, vintage, and original (and, if relevant, revised) project registration date? (*Paragraph 2.4.5*)  YES
- f) are secure (i.e. that robust security provisions are in place)? (*Paragraph 2.4 (c)*)  YES

Summarize and provide evidence of the procedures referred to in a) through f), including the availability to the public of the procedures referred to in b), d), and f):

The program uses the CDM registry administered by the UNFCCC CDM executive Board and Secretariat which assigns traceable serial numbers for units issued, cancelled or retired.

<https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/iProcess/AENOR1568703507.64/view>

List any/all international data exchange standards to which the programme's registry(ies) conform: (*Paragraph 2.4 (f)*)

CDM Registry

Are policies and robust procedures in place to...

- a) prevent the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services? (*Paragraph 2.4.6*)  YES
- b) ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated? (*Paragraph 2.4.6*)  YES

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

<https://cdm.unfccc.int/Registry/index.html>  
<https://cdm.unfccc.int/Reference/COPMOP/08a01.pdf#page=27>

Are provisions in place...

- a) ensuring the screening of requests for registry accounts? (*Paragraph 2.4.7*)  YES
- b) restricting the programme registry (or registries) accounts to registered businesses and individuals? (*Paragraph 2.4.7*)  YES
- c) ensuring the periodic audit or evaluation of registry compliance with security provisions? (*Paragraph 2.4.8*)  YES

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

<https://cdm.unfccc.int/Registry/index.html>  
<https://cdm.unfccc.int/Reference/COPMOP/08a01.pdf#page=27>

### Question 3.5 Legal nature and transfer of units

Does the programme define and ensure the underlying attributes and property aspects of a unit? (*Paragraph 2.5*)  YES

Summarize and provide evidence of *the process by which the programme defines and ensures the underlying attributes and property aspects of a unit*, including its availability to the public:

The units generated by the project is owned by the project proponent or its agent and once transferred, the units are credited to the buyers account.

<https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/view>

### Question 3.6 Validation and verification procedures

Are standards, requirements, and procedures in place for... (*Paragraph 2.6*)

- a) the validation of activities?  YES
- b) the verification of emissions reductions?  YES
- c) the accreditation of validators?  YES
- d) the accreditation of verifiers?  YES

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

[https://cdm.unfccc.int/Reference/Standards/accr\\_man01\\_2.pdf](https://cdm.unfccc.int/Reference/Standards/accr_man01_2.pdf)  
<https://cdm.unfccc.int/DOE/list/index.html>

### Question 3.7 Programme governance

Does the programme publicly disclose who is responsible for the administration of the programme? (*Paragraph 2.7*)

Does the programme publicly disclose how decisions are made? (*Paragraph 2.7*)

Provide evidence that this information is available to the public:

YES

YES

<https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/view>

Can the programme demonstrate that it has... (*Paragraph 2.7.2*)

- a) been continuously governed and operational for at least the last two years?  YES
- b) been continuously operational for at least the last two years?  YES
- c) a plan for the long-term administration of multi-decadal programme elements?  YES

d) a plan for possible responses to the dissolution of the programme in its current form?  YES

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

<https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/iProcess/AENOR1568703507.64/view>

Are policies and robust procedures in place to...

a) prevent the programme staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of programme services? (Paragraph 2.7.3)

YES

b) ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated? (Paragraph 2.7.3)  YES

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

KenGen is a public company listed in the Nairobi Securities Exchange. The company therefore abides by public officers laws and ethics and the capital markets act. The company has a department that handles security and integrity which reports directly to the MD&CEO.

[https://www.dropbox.com/sh/a0iwgxs96iwqvt0/AABWDeYGS5v\\_RScvGmQAmY21a?dl=0](https://www.dropbox.com/sh/a0iwgxs96iwqvt0/AABWDeYGS5v_RScvGmQAmY21a?dl=0)

If the programme is not directly and currently administered by a public agency, can the programme demonstrate up-to-date professional liability insurance policy of at least USD\$5M? (Paragraph 2.7.4)  YES

Provide evidence of such coverage:

### Question 3.8 Transparency and public participation provisions

Does the programme publicly disclose... (Paragraph 2.8)

a) what information is captured and made available to different stakeholders?  YES

b) its local stakeholder consultation requirements (if applicable)?  YES

c) its public comments provisions and requirements, and how they are considered (if applicable)?  YES

Provide evidence of the public availability of items a) through c):

<https://www.dropbox.com/sh/3rvrtg43byy6zh4/AADqUQZPBLUDWfMkjc3GQSpca?dl=0>

Does the programme conduct public comment periods relating to... (Paragraph 2.8)

a) methodologies, protocols, or frameworks under development?  YES

b) activities seeking registration or approval?  YES

c) operational activities (e.g., ongoing stakeholder feedback)  YES

d) additions or revisions to programme procedures or rulesets?  YES

Summarize and provide evidence of any programme procedures referred to in a) through d):

### Question 3.9 Safeguards system

Are safeguards in place to address... (Paragraph 2.9)

a) environmental risks?  YES

b) social risks?  YES

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

The company is mandated under the Environmental Management and Coordination Act 1999 to undertake Environmental and Social Impact Assessment prior to development of projects and annual environmental audits.  
<https://www.dropbox.com/sh/x11q74bqyw1bzrb/AABXexhZlrqqYPblk-y43pP6a?dl=0>

### 3.10 Sustainable development criteria

Does the programme use sustainable development criteria? (Paragraph 2.10)  YES

Does the programme have provisions for monitoring, reporting and verification in accordance with these criteria? (Paragraph 2.10)  YES

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

Sustainable development reports are sent to UNFCCC on a voluntary. The company also is a member of the UN Global Compact

<https://www.unglobalcompact.org/what-is-gc/participants/135905>

<https://www4.unfccc.int/sites/sdcmicrosite/Pages/SD-Reports.aspx>

YES

### 3.11 Avoidance of double counting, issuance and claiming

Does the Programme provide information on how it addresses double counting, issuance and claiming in the context of evolving national and international regimes for carbon markets and emissions trading? (Paragraph 2.11)

Summarize and provide evidence of the information referred to above, including its availability to the public:

The program uses CDM registry that has a means of double accounting. Once the Paris Agreement is adopted, the host country will develop a registry that will among other things avoid double accounting

<https://cdm.unfccc.int/Registry/index.html>

## PART 4: Carbon Offset Credit Integrity Assessment Criteria

*Note*—where “evidence” is requested throughout *Part 3* and *Part 4*, the Programme should provide web links to documentation. If that is not possible, then the programme may provide evidence of programme procedures directly in the text boxes provided (by copying/pasting the relevant provisions) and/or by attached supporting documentation, as recommended in “SECTION II: INSTRUCTIONS—*Form Completion*”.

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

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

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

### Question 4.1 Are additional

Do the Programme’s carbon offsets... (*Paragraph 3.1*)

- a) represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate?  YES
- b) exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario?  YES

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

The program displaces grid connected power plants that use fossil fuels. Check the PDD in the link below  
<https://cdm.unfccc.int/Projects/DB/JC11355128868.24/view>

Is additionality and baseline-setting... (*Paragraph 3.1*)

- a) assessed by an accredited and independent third-party verification entity?  YES
- b) reviewed by the programme?  YES

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

KenGen has contracted Aenor Internacional to verify the project under rules governing DOEs.  
<https://www.dropbox.com/sh/qq84yzs4596q0ix/AABkzJBLzBmTo0p4HTNo24dsa?dl=0>

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

- Barrier analysis
- Common practice / market penetration analysis
- Investment, cost, or other financial analysis
- Performance standards / benchmarks
- Legal or regulatory additionality analysis (as defined in *Paragraph 3.1*)

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

A project design document was developed for the project which covers all the above analyses.  
<https://cdm.unfccc.int/Projects/DB/JC11355128868.24/view>

If the Programme provides for the use of method(s) not listed above, describe the alternative procedures and how they ensure that activities are additional: (*Paragraph 3.1*)

If the programme designates certain activities as automatically additional (e.g., through a “positive list” of eligible project types), does the programme provide clear evidence on how the activity was determined to be additional? (*Paragraph 3.1*)  YES

Summarize and provide evidence of the policies and procedures for determining the automatic additionality of activities, including a) the criteria used to determine additionality and b) their availability to the public:

Explain how the procedures described under Question 4.1 provide a reasonable assurance that the mitigation would not have occurred in the absence of the offset programme: (*Paragraph 3.1*)

The project passed all the additionality, barrier and common practice analyses.

#### Question 4.2 Are based on a realistic and credible baseline

Are procedures in place to... (*Paragraph 3.2*)

- a) issue emissions units against realistic, defensible, and conservative baseline estimations of emissions?  YES
- b) publicly disclose baselines and underlying assumptions?  YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including how “*conservativeness*” of baselines and underlying assumptions is defined and ensured:

Emission units issued are verified by and independent party accredited by UNFCCC.  
<https://cdm.unfccc.int/Projects/DB/JC11355128868.24/iProcess/AENOR1568703507.64/view>

Are procedures in place to ensure that *methods of developing baselines*, including modelling, benchmarking,



rking or the use of historical data, use assumptions, methodologies, and values do not over-estimate mitigation from an activity? (*Paragraph 3.2.2*)  YES

Summarize and provide evidence of the policies and procedures referred to above:  
THE PROGRAM USES methods developed under consolidated methodology ACM0002 by UNFCCC.  
<https://cdm.unfccc.int/methodologies/DB/XP2LKUSA61DKUQC0PIWPGWDN8ED5PG>

Are procedures in place for activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration? (*Paragraph 3.2.3*)  YES

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

#### Question 4.3 Are quantified, monitored, reported, and verified

Are procedures in place to ensure that...

a) emissions units are based on accurate measurements and valid quantification methods/protocols? (*Paragraph 3.3*)  YES

b) validation occurs prior to or in tandem with verification? (*Paragraph 3.3.2*)  YES

c) the results of validation and verification are made publicly available? (*Paragraph 3.3.2*)  YES

d) monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at *specified intervals* throughout the duration of the crediting period? (*Paragraph 3.3*)  YES

e) mitigation is measured and verified by an accredited and independent third-party verification entity? (*Paragraph 3.3*)  YES

f) *ex-post* verification of mitigation is required in advance of issuance of emissions units? (*Paragraph 3.3*)  YES

Are provisions in place... (*Paragraph 3.3.3*)

a) to manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures, and the programme and the activities it supports?  YES

b) requiring accredited third-party(ies) to disclose whether they or any of their family members are dealing in, promoting, or otherwise have a fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated?  YES

c) to address and isolate such conflicts, should they arise?  YES  
Summarize and provide evidence of the policies and procedures referred to in a) through c):

The project follows the monitoring, reporting and verification protocols of Clean Development Mechanism. Third party independent parties.  
<https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/iProcess/AENOR1568703507.64/view>

Are procedures in place requiring that... (*Paragraph 3.3.4*)

a) the  
renewal  
of any

activity at the end of its crediting period includes a reevaluation of its baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario?  YES

b) the same procedures apply to activities that wish to undergo verification but have not done so within the programme's allowable number of years between verification events?  YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including identifying the allowable number of years between verification events:

CDM procedures allows for a project to choose between 10 years fixed crediting period or seven year renewable twice crediting period. For this project, the project proponent chose 7 year renewable twice crediting period therefore there will be need to reevaluate the baseline after expiry of the crediting period.  YES

<https://cdm.unfccc.int/Projects/DB/JCI1355128868.24/view>

Are procedures in place to transparently identify units that are issued *ex-ante* and thus ineligible for use in the CORSIA? (Paragraph 3.3.5)

Provide evidence of the policies and procedures referred to above:

There are no units issued ex-ante. All units must follow the MRV system ex-post.

#### Question 4.4 Have a clear and transparent chain of custody

SECTION III, Part 3.4—*Identification and tracking* includes questions related to this criterion. No additional information is requested here.

#### Question 4.5 Represent permanent emissions reductions

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

None

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

For sectors/activity types identified in the first question in this section, are procedures and measures in place to require and support these activities to...

a) undertake a risk assessment that accounts for, *inter alia*, any potential causes, relative scale, and relative likelihood of reversals? (Paragraph 3.5.2)  YES

b) monitor identified risks of reversals? (Paragraph 3.5.3)  YES

c) mitigate identified risks of reversals? (Paragraph 3.5.3)  YES

d) ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA? (Paragraph 3.5.4)  YES

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

Are provisions in place that... (*Paragraph 3.5.5*)

a) confer liability on the activity proponent to monitor, mitigate, and respond to reversals in a manner mandated in the programme procedures?  YES

b) require activity proponents, upon being made aware of a material reversal event, to notify the programme within a specified number of days?  YES

c) confer responsibility to the programme to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in the programme procedures?  YES

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

Does the programme have the capability to ensure that any emissions units which compensate for the material reversal of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA are fully eligible for use under the CORSIA? (*Paragraph 3.5.6*)  YES

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

Would the programme be willing and able, upon request, to demonstrate that its permanence provisions can fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA? (*Paragraph 3.5.7*)  YES

YES

#### Question 4.6 Assess and mitigate against potential increase in emissions elsewhere

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

None

Are measures in place to assess and mitigate incidences of material leakage of emissions that may result from the implementation of an offset project or programme? (*Paragraph 3.6*)

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

Are provisions in place requiring activities that pose a risk of leakage when implemented at the project-level to be implemented at a national level, or on an interim basis on a subnational level, in order to mitigate the risk of leakage? (*Paragraph 3.6.2*)

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

Are procedures in place requiring and supporting activities to monitor identified leakage? (*Paragraph 3.6.3*)

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

Are procedures in place requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities? (*Paragraph 3.6.4*)

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

**Question 4.7 Are only counted once towards a mitigation obligation**

Does the Programme have measures in place for the following:

a) to ensure the transparent transfer of units between registries; and that only one unit is issued for one tonne of mitigation (*Paragraphs 3.7.1 and 3.7.5*)

YES

b) to ensure that one unit is issued or transferred to, or owned or cancelled by, only one entity at any given time? (*Paragraphs 3.7.2 and 3.7.6*)

c) to discourage and prohibit the double-selling of units, which occurs when one or more entities sell the same unit more than once? (*Paragraph 3.7.7*)

d) to require and demonstrate that host countries of emissions reduction activities agree to account for any offset units issued as a result of those activities such that double claiming does not occur between the airline and the host country of the emissions reduction activity? (*Paragraph 3.7.3*)

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

The units issued are kept in CDM registry. Every transaction is allocated a traceable serial number. Once the units are cancelled or transferred the registry effects the change. The project proponent receives a letter of acceptance from the participating country allowing the project to proceed as a CDM project hence the country will not claim units from the project  
<https://cdm.unfccc.int/Registry/accounts/index.html>

Does the Programme have procedures in place for the following: (*Paragraph 3.7.8*)

a) to obtain, or require activity proponents to obtain and provide to the programme, written attestation from the host country's national focal point or focal point's designee?

YES

YES

YES

b) for the attestation(s) to specify, and describe any steps taken, to prevent mitigation associated with units used by operators under CORSIA from also being claimed toward a host country's national mitigation target(s) / pledge(s)?

c) for Host countr

y attestations to be obtained and made publicly available prior to the use of units from the host country in the CORSIA?

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

YES

YES

YES

Does the Programme have procedures in place to compare countries' accounting for

Does the Programme have procedures in place requiring... (Paragraph 3.7.9)

a) that activities take approach(es) described in (any or all of) these sub-paragraphs to prevent double-claiming?

Emissions units are created where mitigation is not also counted toward national target(s) pledge(s) / mitigation contributions / mitigation commitments. (Paragraph 3.7.9.1)

Mitigation from emissions units used by operators under the CORSIA is appropriately accounted for by the host country when claiming achievement of its target(s) / pledges(s) / mitigation contributions / mitigation commitments, in line with the relevant and applicable international provisions. (Paragraph 3.7.9.2)

Programme procedures provide for the use of method(s) to avoid double-claiming which are not listed above (Paragraph 3.7.9.3)

b) that Host Country attestations confirm the use of approach(es) referred to in the list above?

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

The units issued are kept in CDM registry. Every transaction is allocated a traceable serial number. Once the units are cancelled or transferred the registry effects the change. The project proponent receives a letter of acceptance from the participating county allowing the project to proceed as a CDM project hence the county will not claim units from the project

Does the Programme... (Paragraph 3.7.10)

a) make publicly available any national government decisions related to accounting for units used in ICAO, including the contents of host country attestations described in paragraph 3.7.8?

b) update information pertaining to host country attestation as often as necessary to avoid double-claiming.

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

accounting for emissions units in national emissions reports against the volumes of eligible units issued by the programme and used under the CORSIA which the host country's national reporting focal point or designate

otherwise attested to its intention to not double-claim? (Paragraph 3.7.11)

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

Does the Programme have procedures in place for the programme, or proponents of the activities it supports, to compensate for, replace, or otherwise reconcile double-claimed mitigation associated with units used under the CORSIA which the host country's national accounting focal point or designee otherwise attested to its intention to not double-claim? (Paragraph 3.7.13)

YES

YES

YES

YES

YES

YES

Does the Programme have procedures in place for the programme, or proponents of the activities it supports, to compensate for, replace, or otherwise reconcile double-claimed mitigation associated with units used under the CORSIA which the host country's national accounting focal point or designee otherwise attested to its

intention to not double-claim? (Paragraph 3.7.13)

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

Under the CDM registry, measures have been put in place to avoid double accounting.

YES

YES

Would the Programme be willing and able, upon request, to report to ICAO's relevant bodies, as requested, performance information related to, *inter alia*, any material instances of and programme responses to country-level double-claiming; the nature of, and any changes to, the the number, scale, and/or scope of host country attestations; any relevant changes to related programme measures? (Paragraph 3.7.12)

#### Question 4.8 Do no net harm

Are procedures in place to ensure that offset projects do not violate local, state/provincial, national or international regulations or obligations? (Paragraph 3.8)  YES

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

The project was declared by the host country as a CDM project through letter of acceptance. The project also abides to all local regulation and those ratified by the host county

Describe, and provide evidence that demonstrates, how the programme complies with social and environmental safeguards: (Paragraph 3.8)

An environmental Impact assessment was done for the project and a license issued by National Environmental Management Authority. The license specifies conditions to ensure social and environmental safeguards have been put in place throughout the life cycle of the project.

<https://www.dropbox.com/sh/x11q74bqyw1bzrb/AABXexhZlrqqYPblk-y43pP6a?dl=0>

Describe, and provide evidence of the programme's public disclosure of, the institutions, processes, and procedures that are used to implement, monitor, and enforce safeguards to identify, assess and manage environmental and social risks: (Paragraph 3.8)

The program undertakes annual environmental audits. The audits ensures that environmental and social challenges are identified and addressed in a prudent manner. During the process of audits, the community and other stakeholders share their views about the project's environmental and social performance

<https://www.dropbox.com/sh/x11q74bqyw1bzrb/AABXexhZlrqqYPblk-y43pP6a?dl=0>

**PART 5: Programme comments**

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



**SECTION IV: SIGNATURE**

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

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

*As the Programme Representative, I acknowledge* that:

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

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

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

*Signed:*

---

Full name of Programme Representative (*Print*)

Date signed (*Print*)

---

Programme Representative (*Signature*)

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

**SECTION IV: SIGNATURE**

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

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

As the Programme Representative, I acknowledge that:

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

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

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

Signed:

JOSHUA NIERI

20/4/2020

Full name of Programme Representative (*Print*)

Date signed (*Print*)



Programme Representative (*Signature*)

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



ICAO

## **Programme Application Form, Appendix B**

### **Programme Assessment Scope**

CONTENTS: With this document, programmes may define which of their activities they are submitting for assessment by the TAB. The two sheets are described below:

- Sheet A) Activities the programme describes in this form, which will be assessed by ICAO's T.
- Sheet B) List of all methodologies / protocols that support activities described under Sheet A

AB



