

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

Re-assessment Application Form for CORSA-Eligible Emissions Unit Programmes

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SECTION I: ABOUT THIS RE-ASSESSMENT

Background

In March 2020, the ICAO Council requested TAB to monitor and review the continued eligibility of emissions unit programmes that the Council determined to be eligible under CORSIA. At present, all CORSIA-eligible Emissions Unit Programmes are eligible to supply CORSIA-eligible Emissions Units for the 2021-2023 compliance cycle only.

In view of the Council's request, and in line with TAB Procedures¹, TAB agreed to undertake a re-assessment of all CORSIA-eligible Emissions Unit Programmes in 2022, including to inform TAB's recommendations to ICAO Council regarding the possible extension of the current eligibility timeframe of the 2021-2023 compliance cycle.

ICAO invites all CORSIA-eligible Emissions Unit Programmes interested in continuing to be designated as CORSIA-eligible to apply for the re-assessment by TAB, providing updated information requested through this re-assessment application form and all requested supplementary materials and evidence.

This re-assessment will be conducted in line with TAB's 2022 annual assessment cycle and involve some of the same procedures and timing used in TAB's assessments of new applications and material changes to eligible programme procedures. In undertaking this work, TAB may also ask programmes to provide specific examples or case studies illustrating how programme procedures or systems perform in practice. TAB does not anticipate that this re-assessment will result in recommendations to revise or revoke the eligibility status of emissions units that the ICAO Council has approved for use during the CORSIA's pilot phase.

Focus of the 2022 re-assessment

TAB will pursue four key objectives in this re-assessment process:

- (1) Sample criteria: To assess the continued consistency of programme procedures with these sample Emissions Unit Criteria (EUC) and the related *Guidelines for Criteria Interpretation*:
 - a. Realistic and credible baselines (SG3)
 - b. Additionality (SG3)
 - c. Permanence (SG4), in tandem with the *Guideline* under the *Governance* criterion for having in place long-term plans for the continued admin of multi-decadal elements, including for dissolution (SG1)
 - d. "Only counted once towards a mitigation obligation" (SG5)
 - e. Sustainable development criteria (SG1)
- (2) Updates made to programme procedures: To review procedural changes and updates that programmes introduced *between the dates of (a)* their initial approval by ICAO Council and *(b)* 28 February 2022. Programmes are requested to summarize and provide evidence of any and all changes, including those that were previously submitted for TAB's review as potential material changes². However, TAB's re-assessment

¹ Refer to TAB Procedures paragraph 7.4, 7.7, 7.8, 7.22 and 7.23

² A "Material Change" is defined in TAB Procedures, paragraph 7.3. TAB's Procedures for reviewing potentially-material procedural changes are described in TAB Procedures, paragraphs 7.3, 8.4, 8.5 and 8.6.

will focus on procedural updates that were not previously submitted or assessed as potential material changes.

- (3) Programme Registry Attestations: To review *Emissions Unit Programme Registry Attestations* and provide a summary for Council regarding the status of *Attestation* submission, form completeness, and fulfillment of requirements by each programme and its designated registry(ies).
- (4) Up-to-date documentation: To obtain up-to-date application form and programme materials for record-keeping and versioning purposes.

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

Disclaimer: The information contained in the re-assessment application, and any supporting evidence or clarification provided by the programme including information designated as “business confidential” by the programme, will be provided to the members of the TAB to properly assess the programme and make recommendations to the ICAO Council. The application and such other evidence or clarification will be made publicly available on the ICAO CORSIA website for the public to provide comments, except for information which the applicant designates as “business confidential”. 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 re-assessment and outcome of this process.

SECTION II: INSTRUCTIONS

Submission and contacts

Programmes interested in continuing to be designated as a CORSIA-eligible Emissions Unit Programme are invited to complete and submit the form, along with accompanying evidence no later than close of business on **28 February 2022** via officeenv@icao.int. Within seven business days of receiving this form, the Secretariat will notify the programme that its form was received.

If the programme has questions regarding the completion of this form, please contact ICAO Secretariat.

Form basis and cross-references

Questions in this form align with the questions included in the application for TAB's annual assessment, and are derived from the CORSIA emissions unit eligibility criteria (EUC) and any *Guidelines for Criteria Interpretation*. Each question includes the paragraph number for its corresponding criterion or guideline that can be found in [Appendix A “Supplementary Information for Assessment of Emissions Unit Programmes”](#).

Application Form completion

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

A “complete” response involves three components: 1) a written summary response, 2) supporting evidence, 3) planned programme revisions, and 4) updates and changes to programme procedures since the initial application/approval.

- 1) **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.
- 2) **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 are expected to substantiate their responses in any of these ways (**in order of preference**):

- a) web links to supporting documentation included along with the written summary response to each given question; with instructions for finding the relevant information within the linked source (i.e. identifying the specific text, paragraph(s), or section(s) where TAB can find evidence of the programme procedure(s) in question);

- b) copying/pasting information directly into this form (no character limits) along with the written summary response;
- c) attaching supporting documentation to this form at the time of submission, with instructions for finding the relevant information within the attached document(s);

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

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

[Paragraph(s) introducing and summarizing specific programme procedures relevant to question]

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

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

- a) 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).

4) Updates and changes to programme procedures since the initial application/approval: Each question in this form provides discrete fields for the programme to include, and clearly distinguish between, two key pieces of information:

- (1) the information provided by the programme in its initial application—which includes all written clarifications and explanations shared with TAB over the course of the programme’s initial assessment;

and

- (2) new information describing any and all procedural changes and updates that programmes introduced *between the dates of (a) their initial approval by ICAO Council and (b) 28 February 2022*. Here, Programmes are requested to summarize and provide evidence of any and all changes, including those that were previously submitted for TAB’s review as potential material changes.

Scope of application and re-assessment

The programme may elect to revise the scope of activities supported by the programme and assessed by TAB, as compared to its current scope of eligibility. In such a case, the programme is requested to clearly identify, in the

following Appendices, the additional activities that it wishes to submit for, or exclude from, TAB's re-assessment:

In **Appendix B** "*Programme Re-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 were previously assessed by TAB and **is currently eligible under the Scope of Eligibility³, and additional elements that the programme is submitting for TAB's assessment**; 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 that were excluded from TAB's previous assessments or are **currently outside of programme's Scope of Eligibility, and additional elements that the programme wishes to exclude from TAB's assessment**; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements.

(NEW in 2022) In **Appendix D** "*Emissions Unit Programme Registry Attestation*", the programme should complete and submit the information outlined in the instructions below, based on the status of its *Registry Attestation*:

- **Programme has previously completed and submitted a *Registry Attestation***: Respond only to new Question 7.3 in the *Emissions Unit Programme Registry Attestation* form (Appendix D). ICAO will append this response to the programme's most recent *Registry Attestation* on file.
 - o NOTE: These Programmes **are not** required to re-submit the *Registry Attestation*'s signature page or any other information in Questions 7.1, 7.2, 7.4–7.11 of Appendix D, but may use this opportunity to inform ICAO of any needed updates.
- **Programme has not previously completed and submitted a *Registry Attestation***: Refer to the instructions for completing the attached *Emissions Unit Programme Registry Attestation*, including the signature page and accompanying information form (Appendix D). Provide the completed materials along with this application form.

(NEW in 2022) Treatment of EUC-relevant programme procedures at the methodology level

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

The CORSIA EUC and TAB assessments typically apply to *programme-level* procedures rather than to individual methodologies or projects. Most programmes' overarching guidance documents contain a mix of *general/guiding* requirements and *technical* ones. However, some programmes set out general requirements in overarching guidance documents, while reflecting key technical procedures in programme methodologies⁴. **Such methodologies may be relevant to TAB's assessment**. This could be the case where, e.g., the methodologies are developed directly by the

³ As defined in the latest ICAO Document "*CORSIA-Eligible Emissions Units*", available via <https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-Emissions-Units.aspx>

⁴ Note that any applicant may use different terminology. For example, a programme may refer to a "methodology" as a protocol or framework.

programme (staff or contractors); the programme must refer to a methodology's requirements when describing its alignment with the EUC; the programme's general requirements alone are too high-level/non-specific for TAB to assess them as stand-alone procedures.

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

“Linked” certification schemes

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

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

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

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

Disclosure of programme application forms and public comments

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

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

SECTION III: APPLICATION FORM

PART 1: General information

A. Programme Information

Programme name: [Global Carbon Council \(GCC\)](#)

Administering Organization⁵: [Gulf Organisation for Research & Development \(GORD\)](#)

Official mailing address: [Amwal Tower, Building No. 58, Floor No 15, Unit A Alwehda Street, Street No. 820, Zone 61 Aldafna, Doha, Qatar](#)

Telephone #: [+974 4425 4666](#)

Official web address: <http://www.globalcarboncouncil.com>

B. Programme Administrator Information

Full name and title: [Dr. Yousef Al Horr, Founding Chairman](#)

Employer / Company (*if not programme*): [Gulf Organisation for Research & Development \(GORD\)](#)

E-mail address: alhorrr@globalcarboncouncil.com Telephone #: [+974 44049000](#)

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

Full name and title: [Kishor Rajhansa, Chief Operations Officer](#)

Employer / Company (*if not Programme*): [Gulf Organisation for Research & Development \(GORD\)](#)

E-mail address: k.rajhansa@globalcarboncouncil.com Telephone #: [+974 44254668](#)

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:

GCC Operations Team:

[Dr. Yousef Al Horr, Founding Chairman, Founding Chairman, GCC and Chairman-GCC Advisory Board](#)

[Mr. Kishor Rajhansa, Chief Operations Officer, GCC, Coordinator-GCC Advisory Board, and Facilitator-GCC Steering Committee](#)

[Mr. Amit Thusu, Director-Carbon & Climate Action, GCC, and Coordinator- GCC Steering Committee](#)

[Mr. Hemant Nandanpawar, Director- Stakeholder Engagement](#)

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

Mr. Vijay Mediratta, Director, GORD
Mr. Subhendu Biswas, Senior Manager-Climate Action, GCC
Dr. Wojciech Galinski, Senior Advisor-Nature-based Solutions, GCC
Mr. Joseph Prakash, Senior Manager-Climate Action, GCC
Mr. Raed Al-Qawasmeh, Senior Manager-Stakeholders Engagement, GCC
Mr. Wei Deng, Manager-Registry Affairs, GCC

Refer to attached CVs in **Annex 7**

GCC Advisory Board:

CVs are available on GCC website: <https://www.globalcarboncouncil.com/governance/advisory-board/>

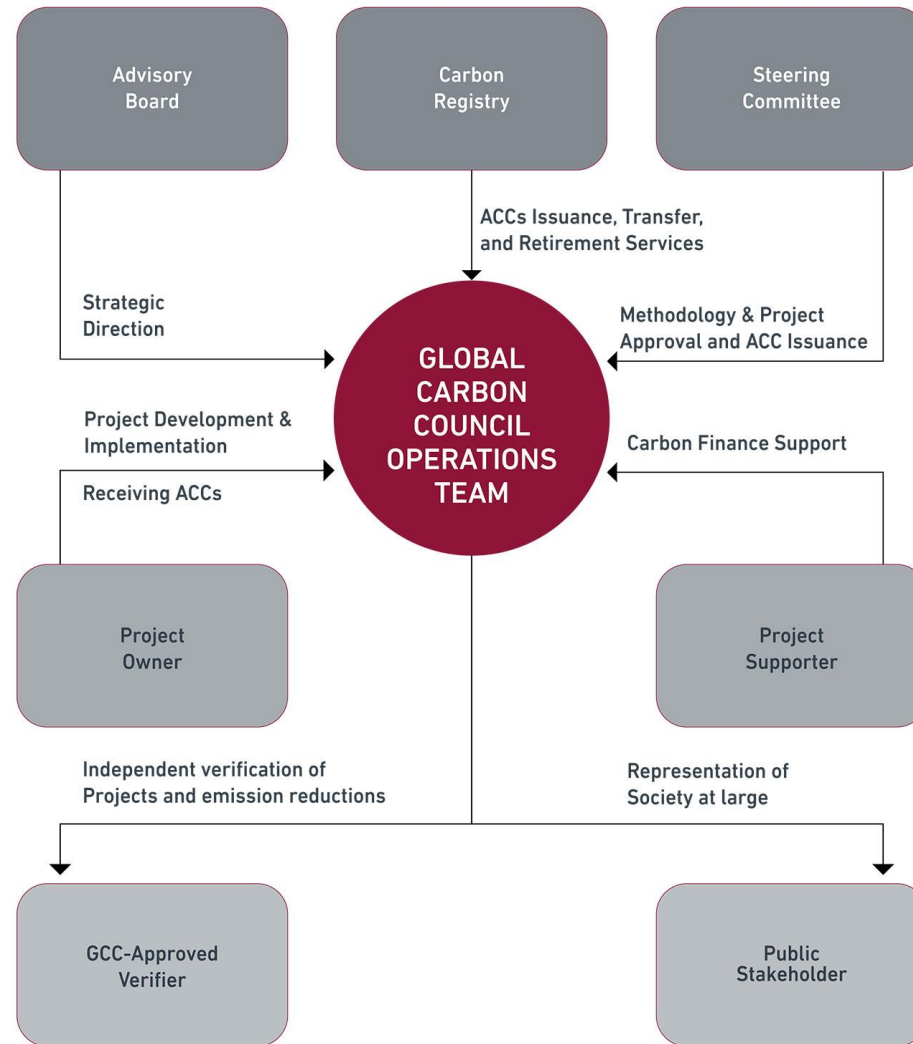
Dr. John Kilani – GCC Advisory Board Member
Prof. Ms. Mariam Al-Maadeed – GCC Advisory Board Member
Dr. Mohammad Al-Kuwari – GCC Advisory Board Member
Mr. Simon Henry – GCC Advisory Board Member
Mr. Yosouf Abdulrahman – GCC Advisory Board Member
Mr. Saurabh Kumar- GCC Advisory Board Member
Dr. Massamba Thioye- GCC Advisory Board Member

GCC Steering Committee:

CVs are available on GCC website: <https://www.globalcarboncouncil.com/governance/steering-committee/>

Mr. Ambachew F. Admassie, GCC Steering Committee Member
Ms. Julieta Georgieva, GCC Steering Committee Member
Mr. Clemens Ploechl, GCC Steering Committee Member
Mr. Vinay Deodhar, GCC Steering Committee Member
Mr. Werner Betzenbichler, GCC Steering Committee Member

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.globalcarboncouncil.com/governance/institutional-set-up-of-gcc/>



Advisory Board of Global Carbon Council



Dr. YOUSEF AL HARR
Advisory Board Chairman



Dr. JOHN KILANI
Advisory Board Member



Prof. MARIAM AL-MAADEED
Advisory Board Member



Dr. MASSAMBA THIOYE
Advisory Board Member



Dr. MOHAMMAD AL-KUWARI
Advisory Board Member



Mr. SAURABH KUMAR
Advisory Board Member



Mr. SIMON HENRY
Advisory Board Member



Mr. YOSOUF ABDULRAHMAN
Advisory Board Member



Mr. KISHOR RAJHANSA
Advisory Board Coordinator



Steering Committee of Global Carbon Council



Mr. CLEMENS PLOECHL
Steering Committee Member



Ms. JULIETA NIKOVA
Steering Committee Member



Mr. AMBACHEW ADMASSIE
Steering Committee Member



Mr. VINAY DEODHAR
Steering Committee Member

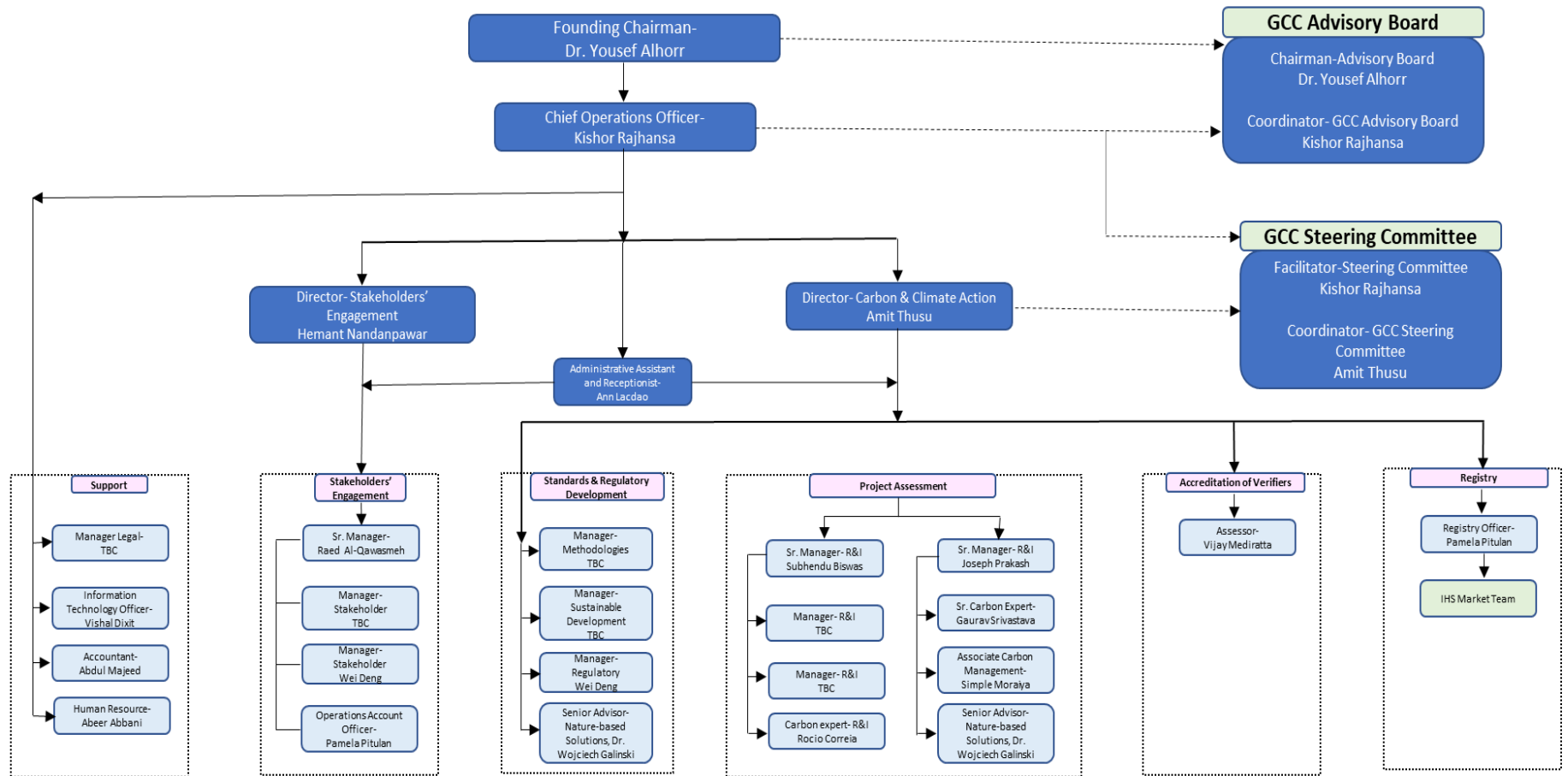


Mr. WERNER BETZENBICHLER
Steering Committee Member



Mr. KISHOR RAJHANSA
Steering Committee Coordinator

Organization Chart - GCC Program



PART 3: Emissions Unit Programme Design Elements

Note—where “evidence” is requested throughout *Part 3* and *Part 4*, the programme is expected to provide web links to documentation and to identify the specific text, paragraph(s), or section(s) where TAB can find evidence of the programme procedure(s) in question. If that is not possible, then the programme may provide evidence of programme procedures directly in the text boxes provided (by copying/pasting the relevant provisions) and/or by attached supporting documentation, as recommended in “SECTION II: INSTRUCTIONS—**Form Completion: Supporting Evidence**”.

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

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

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

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

Provide *evidence*⁶ 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. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

- [GCC Program develops the methodologies through top-down process while following complete transparency and public consultation processes. Refer section 4 of \[Program Processes\]\(#\) document at \[GCC website\]\(#\).](#)
- [GCC Program allows the use of GCC Methodologies and 250+ CDM methodologies and tools.](#)
- [As on date two GCC Methodologies are approved and four more under development. Refer approved \[GCC methodologies\]\(#\) at \[GCC website\]\(#\).](#)

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none*, “N/A”):

[One more new GCC methodology GCCM003-“\[Methodology for Energy Generation from Animal Manure and Waste Management Projects\]\(#\)” has been developed through top-down process based on the request of project developer from Turkey.](#)

⁶ 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*”.

Version 3.0 of Methodology GCCM001- "[Methodology for Renewable Energy Generation Projects Supplying Electricity to Grid or Captive Consumers](#)" are developed based on inputs from TAB-CORSIA and potential project owners. Under this revision, the following changes were made.

- The list of countries where renewable energy technologies are automatically additional, based on low penetration has been removed.
- The applicability of methodology is extended to cover the project activities where the renewable power generation projects are connected to battery storage that enhances utilization factor of power projects and add to the displacement of fossil fuel-based energy.
- For existing applicability of grid-connected project activities, now the methodology is also extended to cover the situation where the electricity is supplied to captive users who, in absence of renewable energy from project, would use electricity from grid.

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and questions pertaining to this question:

- [GCC Program develops the methodologies through top-down process while following complete transparency and public consultation processes. Refer to section 4 of Program Processes document at the GCC website.](#)

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the Council's initial approval of programme eligibility (*if none, "N/A"*):

[N/A. The procedure of development and revision of methodologies referred to in section 4 of Program Processes document is not changed.](#)

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

[Refer section 4 of Program Processes document on the GCC website.](#)

[Refer Standard for Development of Methodologies on GCC the website.](#)

[Refer Baseline & Monitoring Methodologies on the GCC website.](#)

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the Council's initial approval of programme eligibility (*if none, "N/A"*):

[N/A](#)

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*)

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The Scope of GCC Program is limited to individual GCC project activities. GCC Program is not designed as of now for Programme of Activities (PoA).

In line with the UNFCCC Clean Development Mechanism, the GCC Program develops methodologies and accepts project submission and verification under following sectoral scopes. GCC program also allows the application of International Accreditation Forum’s requirements contained in IAF MD 14 (https://iaf.nu/iaf_system/uploads/documents/IAF_MD_AppIn_17011_GHGVV_09072_014_Publication_Version.pdf) that defines the sectoral scopes for projects applying ISO-14064-2.

| Sectoral Scope # | Sectoral Scope Title |
|------------------|--|
| 1. | Energy industries (renewable - / non-renewable sources) |
| 2. | Energy distribution |
| 3. | Energy demand |
| 4. | Manufacturing industries |
| 5. | Chemical industry |
| 6. | Construction |
| 7. | Transport |
| 8. | Mining/Mineral production |
| 9. | Metal production |
| 10. | Fugitive emissions from fuels (solid, oil and gas) |
| 11. | Fugitive emissions from production and consumption of halocarbons and sulphur hexafluoride |
| 12. | Solvents use |
| 13. | Waste handling and disposal |
| 14. | Afforestation and reforestation |
| 15. | Agriculture |
| 16. | Carbon Capture and Storage |

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A.

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

| | |
|--|--|
| GHG Scopes, Sectoral Scopes and Project Types accepted by GCC Program | <ul style="list-style-type: none">▪ Scope: (i) Mandatory GHG Scope includes all Kyoto Protocol GHGs; (ii) Environmental No-harm (E+); (iii) Social No-harm (S+); (iv) Sustainable Development Goals (SDG+).▪ GHG Sectoral Scopes: All 16 sectoral scopes of CDM and corresponding scopes of International Accreditation Forum (IAF) as per ISO-14064-2 (Refer IAF’s MD14 document at https://iaf.nu/iaf_system/uploads/documents/IAF MD Appln 17011 GH GVV 09072014 Publication Version.pdf)▪ For GCC Program Scopes and GHG Sectoral Scopes Refer Annex-1 of Procedure for approval of GCC Verifiers at https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/procedure-for-approval-of-gcc-verifiers-v2.2.pdf▪ Projects Types⁷: New futuristic project (A1), Prompt-start project with 2-year window for registration (A2), De-registered CDM Projects (B1, B2).▪ Complete mapping of ISO 14064-2 requirements with GCC Project Standard is done in Annex-1 of Project Standard. |
|--|--|

⁷ * **Note:** All projects submitted to GCC must start operation on or after 1 January 2016. This is primarily for two reasons: (i) GCC Program started in 2016 (formerly known as “Gulf Carbon Trust” and “Global Carbon Trust”); (ii) This is the vintage accepted by ICAO Council for their eligibility under CORSIA scheme. Following types of projects are accepted under GCC Program.

A1 type projects: The start date of the operations for such GCC projects shall be on or after the date of approval of "Project Standard (version 3)" by GCC Steering Committee and after the date of submission of a 'complete' request of registration to GCC Program. The start date of the Crediting Period of such GCC Project Activity shall be after the date of approval of "Project Standard (version 3)" but not more than one year after the start date of the operations of the GCC Project Activity.

A2 type projects: These types of projects are prompt-start and have already started their operations as on the date of approval of "Project Standard (version 3)" by GCC Steering Committee and their start date of operations shall be after 1 January 2016 but before two years after the date of approval of "Project Standard (version 3)" by GCC Steering Committee. These types of projects shall submit complete request for registration to GCC Program not later than 2 years after the date of approval of "Project Standard (version 3)". The start date of the Crediting Period of such GCC Project Activity shall be on or after 1 Jan 2016 but not more than one year after the start date of the operations of the GCC Project Activity.

B1 type projects: These types of projects include all de-registered CDM projects whose Project Owners (or Project Participants as per CDM Glossary of Terms) wish to register them with GCC, but also wish to claim additional GCC labels of E+, S+ and SDG+. The start date of the Crediting Period of such GCC projects shall be after 1 Jan 2016 and same as that stipulated in CDM Project Design Document (as uploaded on UNFCCC website).

B2 type projects: These types of projects include all de-registered CDM projects whose Project Owners (or Project Participants as per CDM Glossary of Terms) wish to register them with GCC, but do not wish to claim additional GCC labels. The start date of the Crediting Period of such GCC projects shall be after 1 Jan 2016 and same as that stipulated in CDM Project Design Document (as uploaded on UNFCCC website).

| | |
|--|--|
| | <ul style="list-style-type: none"> ▪ Locations: All countries around the world (including developing, developed, LDC, SIDs etc). ▪ Refer Project Standard at https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Standard-v3.1.pdf; ▪ Exclusions: Nuclear energy, HFC-23 abatement and REDD project activities. In addition, following project types are excluded from scope of GCC Program. <ul style="list-style-type: none"> ➤ Afforestation & Reforestation (A&R) and Carbon Capture & Storage (CCS) projects (Sectoral Scopes 14 & 16 as per CDM and IAF) submitted to GCC Program declaring intent to supply carbon credits to international aviation sector in line with CORSIA eligibility requirements. |
|--|--|

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

Categorization of project activities is expanded as per [Clarification 1](#). This clarification will be incorporated into various GCC documents in 2022. This is not a fundamental change, as GCC now allows the projects previously registered with other programs, subject to either deregistration or a declaration that Project Owner shall not request the previous GHG program for any issuances in future. The elaboration of expanded project categories is provided below:

A1 type projects: This type includes new futuristic projects, not submitted to any GHG Program, which shall start operations after submission of a complete GCC registration request (the stage after completing project Verification by GCC Verifier and clearing of completeness check by GCC Operations Team). The start date of the crediting period of such GCC Project Activity shall be after registration with the GCC Program, but not more than one year after the Operations Start date. ACCs with or without certification labels (E+, S+, SDG+, C+), can only be issued by GCC Program, for 10 years. A fresh Project Verification shall be conducted for the scope covering GHG and certification labels (E+, S+, SDG+, C+) as required by GCC Program Process.

A2 type projects: Projects of this type shall make the initial submission (for starting Global stakeholder consultation) to the GCC Program before 5 July 2022. A fresh Project Verification shall be conducted for the scope covering GHG and certification labels (E+, S+, SDG+, C+) as required by GCC Program Process. Note that CDM or any other Validation Report is not valid and cannot be used for these project types.

Sub-type 1: This sub-type includes existing operational projects, not submitted to any GHG Program, which have started operations after 1 January 2016. The start date of the crediting period of such GCC Project Activity shall be after 1 Jan 2016 but not more than one year after the Operations Start Date and ACCs can only be issued by GCC Program, for 10 years.

Sub-type 2: This sub-type includes those projects, which have been registered with CDM or any Program[3] before 1 Jan 2016 but did not start operations at all on the start date of GSC with the GCC program (i.e., CERs/units have not been issued). Projects of this sub-type shall either

be deregistered from CDM/under article 6.4/ or any other Program or submit a public undertaking which states that the Project Owner will never submit any request for issuance or request for renewal of crediting period to the CDM-EB/under article 6.4/any authority (if and when applicable) after submission to the GCC Program. The start date of the crediting period of such GCC Project Activity shall be after 1 Jan 2016 but not more than one year after the Operations Start Date. ACCs, with or without certification labels, can only be issued by GCC Program, for the remaining crediting period for which CERs/units have not been issued by CDM Executive Board of the UNFCCC or any authority, subject to a ceiling of 10 years under the GCC Program.

Sub-type 3: This sub-type includes those projects, which have been registered with CDM or any Program before 1 Jan 2016 but started operations only after 1 Jan 2016 (and CERs/units have not been issued). Projects of this type shall either be deregistered from CDM/under article 6.4/any Program or submit a public undertaking which states that the Project Owner will never submit any request for Issuance or request for renewal of crediting period to CDM-EB/under article 6.4/any authority (if and when applicable) after submission to the GCC Program. The start date of the crediting period of such GCC Project Activity shall be after 1 Jan 2016 but not more than one year after the Operations Start Date. ACCs, with or without certification labels, can only be issued by GCC Program, for the remaining crediting period for which CERs/units have not been issued by CDM Executive Board of the UNFCCC or any authority, subject to a ceiling of 10 years under GCC Program.

Sub-type 4: This sub-type of projects includes those CDM excluded CPAs, which have been included in CDM registered PoAs after 1 Jan 2016. Projects of this type shall, have started operations after 1 Jan 2016 (CERs may have been issued). Exclusion of CPA from the registered CDM-PoA is required prior to submission to the GCC Program. The start date of the crediting period of such GCC Project Activity shall be after 1 Jan 2016 and the same as that stipulated in the included CDM-CPA Project Design Document (as uploaded on the UNFCCC website) of the registered CDM-PoA. ACCs, with or without certification labels, can only be issued by GCC Program, for the remaining crediting period for which CERs have not been issued, by CDM Executive Board of the UNFCCC, which shall not extend beyond end date of the 28 years life of the PoA and subject to a ceiling of 10 years under GCC Program.

B-type projects: Projects of this type shall either be deregistered from CDM or submit a public undertaking which states that the Project Owner will never submit any request for Issuance or request for renewal of crediting period to CDM-EB or under article 6.4 (if and when applicable) after submission to GCC Program. ACCs, can only be issued, for the remaining crediting period for which CERs have not been issued by CDM Executive Board of the UNFCCC, subject to a ceiling of 10 years under GCC Program. The start date of the crediting period of such GCC Project Activity shall be after 1 Jan 2016 and the same as that stipulated in the registered CDM Project Design Document (as uploaded on the UNFCCC website).

B1 type projects: This type includes those CDM projects, which have been registered with CDM after 1 Jan 2016, have started operations after 1 Jan 2016 (CERs may have been issued), and

wish to register them with GCC Program, but also wish to claim additional GCC labels (related to contribution to SDGs, Do-No-Net-Harm to Environment and Society, Host Country Attestation on Double Counting). Project Verification is only required for verifying the gaps and part of the additional information in the PSF regarding additional labels and any other information not covered by the CDM Validation Report. For sections related to GHG emission reductions, the CDM Validation Report can be referred.

B2 type projects: Projects of this type are similar to type B1 projects but do not wish to apply for additional certification Labels (related to contribution to SDGs, Do-No-Net-Harm to Environment and Society, Host Country Attestation on Double Counting) and are not eligible for the CORSIA label (C+). Project Verification is not required to be conducted as there is no additional information in the PSF regarding GHG emission reductions that is not covered by the CDM Validation Report. For these projects, the CDM Validation Report may be used instead of the PSF and GCC Project Verification Report and can be directly registered under GCC Program.

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)

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Refer sections 4 and 5 of GCC [Project Standard](#) version 3.1 on GCC website.

Refer section 5 of GCC [Program Framework](#) version 2.1 on GCC website.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

Refer section 6 of [Clarification 1](#) on GCC website. This clarification will be incorporated in Project Standard.

Question 3.3. Offset credit issuance and retirement procedures

| | |
|--|---|
| Are procedures in place defining how offset credits are... (Paragraph 2.3) | |
| a) issued? | <input checked="" type="checkbox"/> YES |
| b) retired / cancelled? | <input checked="" type="checkbox"/> YES |
| c) subject to discounting (<i>if any</i>)? | <input checked="" type="checkbox"/> YES |

| | |
|---|---|
| Are procedures in place defining... (Paragraph 2.3) | |
| d) the length of crediting period(s)? | <input checked="" type="checkbox"/> YES |
| e) whether crediting periods are renewable? | <input checked="" type="checkbox"/> 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:

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Please refer to the GCC document on ‘Program Process’ V4.0 dated 11/02/2021 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Processes-v4.pdf>), which provides requirements on the entire project cycle right from the submission of the project till issuance, retirement/cancellation of the ACCs by the GCC program.

The procedures for:

- issuance of ACCs are given in section 3.2 of Program Processes and also contained in paragraph 93 of Program Process.
- retirement/cancellation of the ACCs are given in paragraph 94 of ‘Program Process’ V4.0 dated 11/02/2021 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Processes-v4.pdf>), which stipulates that transferring or retiring of credits, shall be executed directly on the GCC Carbon registry website as per its procedures related to the management of projects and units throughout a credit’s entire lifecycle and available on website (<https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>) as per footnote 12 of the GCC Projects Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>).
- Unit discounting is addressed through the conservativeness provisions for estimation of emission reductions and other considerations in specific CDM/GCC methodologies.

The procedure for length of the crediting period is contained in paragraph 51 of the GCC Projects Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>) and paragraph 39 of Project Standard, V3.1 dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Standard-v3.1.pdf>), which stipulates a fixed crediting period of 10 years and does not allow its renewal.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

Question 3.4 Identification and Tracking

| | |
|--|---|
| Does the programme utilize an electronic registry or registries? (Paragraph 2.4.2) | <input checked="" type="checkbox"/> YES |
|--|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The IHS Markit registry is a third-party hosted registry available at the following link: <https://mer.markit.com/br-reg/public/public-view/#/account>. As per paragraph 56-59 and footnote 20 of Program Process, GCC has a contract with IHS Markit (a 3rd party) to provide the registry services and GCC online Carbon Registry is operated by IHS Markit on behalf of GCC Program, and accessible via IHS Markit website (<https://ihsmarkit.com/products/environmental-registry.html>). Paragraph 50-57, footnote 12 of the GCC Projects Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>), provides details of IHS Markit Registry and maintains thorough operational procedures (<https://cdn.ih.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>) related to the management of projects and units throughout a credit’s entire lifecycle.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

| | |
|--|---|
| Does the programme have procedures in place to ensure that the programme registry or registries...: | |
| a) have the capability to transparently identify emissions units that are deemed ICAO-eligible, in all account types ? (Paragraph 2.4.3) | <input checked="" type="checkbox"/> YES |
| b) identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement? (Paragraphs 2.4 (a) and (d) and 2.4.4) | <input checked="" type="checkbox"/> YES |
| c) identify unit status, including retirement / cancellation, and issuance status? (Paragraph 2.4.4) | <input checked="" type="checkbox"/> YES |
| d) assign unique serial numbers to issued units? (Paragraphs 2.4 (b) and 2.4.5) | <input checked="" type="checkbox"/> 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) | <input checked="" type="checkbox"/> YES |
| f) are secure (i.e. that robust security provisions are in place)? (Paragraph 2.4 (c)) | <input checked="" type="checkbox"/> 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):

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The summary 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) are contained in paragraph 50-57, footnote 12 of the GCC Projects Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>), which provides details of IHS Markit Registry and provides reference to operational procedures related to the management of projects and units throughout a credit's entire lifecycle as stipulated below:

The GCC's Carbon Registry is designed, operated and maintained by an internationally recognized third-party provider: IHS Markit.⁸ IHS Markit follows thorough operational procedures related to the management of projects and units throughout the entire lifecycle of credits. The GCC aims to maintain environmental integrity by using the Carbon Registry to prevent double counting and double issuance while ensuring complete transparency.

The GCC Carbon Registry takes into account that GCC Project Activities are restricted to a fixed crediting period of 10 years without the possibility of renewal.

The IHS Markit registry system features the ability to designate which market eligibility criteria are met by individual units. It contains a workflow engine that allows units to proceed through a range of status changes. These status changes include transfers from one account to another, and through the credit lifecycle including from pending issuance through retired or cancelled. The IHS Markit registry system also assigns unique serial numbers to issued ACCs, which can be tracked from issuance through to transfer or use (cancellation or retirement). The IHS Markit registry also assigns unique 54-digit serial numbers (e.g., Serial No: GCC-ACC-QA-104000000026284-01012018-31122018-11001-12000-MER-0-P) to issued GCC carbon credits, i.e., ACCs, that can be tracked from when the unit is issued through to its transfer or use (cancellation or retirement) via the registry system. A clear chain of custody is maintained by IHS Markit in the registry.

IHS Markit maintains a clear chain of custody in operating the GCC Carbon Registry. The terms and conditions governing the operation and maintenance of the IHS Markit registry system, which describe security provisions and policies regarding legal title to units, are available online.⁹ IHS Markit conducts registry operations according to an established governance and code of conduct, which is also publicly available.¹⁰

Certain details related to GCC Project Activities and ACCs are publicly visible on the IHS Markit website, including the host country, project type/sector, and ACC vintage years. The GCC Program webpage for the Carbon Registry displays all certification labels (E+, S+ and SDG+) awarded to and ACCs issued to GCC Project Activities. Information regarding project registrations and issuance of ACCs is disclosed to the public on a project-by-project basis on the IHS Markit Registry website.¹¹

The GCC Carbon Registry webpage also displays different market eligibility flags for which Project

⁸ IHS Markit registry: <https://ihsmarkit.com/products/environmental-registry.html>

⁹ Terms and conditions: <https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>.

¹⁰ Governance and code of conduct: <http://investor.ihsmarkit.com/phoenix.zhtml?c=188457&p=irol-govhighlights>

¹¹ GCC Registry public view: <https://mer.markit.com/br-reg/public/public-view/#/project>

Activities are registered and ACCs have been issued. For example, Project Activities and ACCs that qualify for use under CORSIA are declared to be CORSIA Compliant on the public webpage of the GCC Carbon Registry. Regarding identifying and distinguishing units, all units in the Registry have a flag which denotes whether they are CORSIA-eligible. Once this indicator flag is appended to units by the registry administrator and regulator, then they are clearly distinguishable from other voluntary or compliance units. This means that the job of any Airline Operator or ICAO gets simplified to identify emission units that are eligible under CORSIA. The assigning of the “CORSIA-Compliant” flag by GCC is done if the projects are registered and associated emission units/credits (i.e. ACCs) are issued based on the confirmation that the relevant GCC rules that incorporate the CORSIA’s ‘EMISSIONS UNITS CRITERIA (EUC)’ have been applied in implementation and monitoring of projects.

The GCC Registry performs several functions, including accounting and recording of certified ACCs issued by the GCC to GCC Project Activities. The GCC Operations Team is responsible for: ensuring that all required project documents are submitted to the registry; issuing and maintaining ACCs accounts for account holders; tracking and reporting the deposit/withdrawal of ACCs to/from the centrally managed account; and maintaining custody and records of the legal ownership of ACCs. The Registry allows listing, issuance, transfer and cancellation of ACCs.

Each Project Owner has a separate account that holds all issued ACCs. Project Owners can open an account in the GCC/IHS Markit Registry by filling out an IHS Markit account opening form online.¹² Applicants for GCC/IHS Markit Registry accounts are also required to comply with requisite Know-Your-Customer (KYC) checks.

The Registry can be used for various purposes, e.g., supporting voluntary carbon neutrality or CORSIA offsetting by international airlines. The Registry is used to facilitate the cancellation of credits as required by buyers. The Registry also supports the opening of accounts for traders in secondary market as well as those for retail aggregators.

Also, GCC Program Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>) makes reference to paragraph 50-57 and footnote 12 and 13, which provides a link to the following:

- Terms and conditions governing the IHS Markit Registry (<https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>);
- Governance and code of conduct for IHS Markit (<http://investor.ihsmarkit.com/phoenix.zhtml?c=188457&p=irol-govhighlights>); and
- IHS Markit’s Information Security Overview (<https://cdn.ihsmarkit.com/www/pdf/1018/IHS-Markit-Information-Security-Overview-External.pdf>).

The above stated weblinks provide access to IHS Markets policies and procedural documents, which requires IHS market to conduct registry operations according to an established governance and code of conduct and defines policies and procedures to:

- (a) restrict the programme registry accounts to registered businesses;

¹² Online account opening: <https://mer.markit.com/br-reg/public/customer-registration.jsp>

- (b) ensure the screening of requests for registry accounts;
- (c) ensure that the registry has the capability to transparently identify emissions units that are deemed ICAO-eligible, in all account types;
- (d) identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement;
- (e) identify unit status, including retirement / cancellation, and issuance status;
- (f) assign unique serial numbers to issued units;
- (g) 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;
- (h) the underlying attributes of a unit;
- (i) the underlying property aspects of a unit;
- (j) ensure that robust security provisions are in place;
- (k) describe process of the periodic audit or evaluation of registry compliance with security provisions;
- (l) list all international data exchange standards to which the programme's registry conform to;
- (m) prevent the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services; and
- (n) to ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated.

Please also refer to 'Re-assessment_Application_Form_Appendix_D_Emissions Unit Programme Registry IHSM', attached with this application, which provides "Emissions Unit Programme Registry Attestation" and provides specific registry related information.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the Council's initial approval of programme eligibility (*if none, "N/A"*):

N/A

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

IHS Markit, as an information services firm, is already connected with the largest financial institutions, trading platforms, exchanges, and clearing and settlement systems globally for a number of our products. Registry connectivity is the basis of the IHS Markit Registry system. The system's ability to host 25+ different standards/programs, allowing stakeholders to view asset holdings across programs in one consolidated view, is a unique technological offering in the market.

Due to confidentiality concerns, IHS Markit does not disclose externally its security provisions beyond those outlined in the:

- a) IHS Markit Registry's terms and conditions: <https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf> as per footnote 12 of the GCC Projects Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>); and

b) IHS Markit’s Information Security Overview: <https://cdn.ihsmarkit.com/www/pdf/1018/IHS-Markit-Information-Security-Overview-External.pdf> .

Please also refer to ‘Re-assessment_Application_Form_Appendix_D_Emissions Unit Programme Registry IHSM’, attached with this application, which provides “Emissions Unit Programme Registry Attestation” and provides specific registry related information.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
N/A

| | |
|---|---|
| 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? (<i>Paragraph 2.4.6</i>) | <input checked="" type="checkbox"/> YES |
| b) ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated? (<i>Paragraph 2.4.6</i>) | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Also, GCC Program Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>) makes reference to paragraph 50-57 and footnote 12 and 13, which provides a link to the following:

- Terms and conditions governing the IHS Markit Registry (<https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>);
- Governance and code of conduct for IHS Markit (<http://investor.ihsmarkit.com/phoenix.zhtml?c=188457&p=irol-govhighlights>); and
- IHS Markit’s Information Security Overview (<https://cdn.ihsmarkit.com/www/pdf/1018/IHS-Markit-Information-Security-Overview-External.pdf>).

The above stated weblinks provide access to IHS Markets policies and procedural documents, which requires IHS market to conduct registry operations according to an established governance and code of conduct and defines policies and procedures to:

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

Please also refer to ‘Re-assessment_Application_Form_Appendix_D_Emissions Unit Programme Registry IHSM’, attached with this application, which provides “Emissions Unit Programme Registry Attestation” and provides specific registry related information.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

| | |
|---|---|
| Are provisions in place... | |
| a) ensuring the screening of requests for registry accounts? (<i>Paragraph 2.4.7</i>) | <input checked="" type="checkbox"/> YES |
| b) restricting the programme registry (or registries) accounts to registered businesses and individuals? (<i>Paragraph 2.4.7</i>) | <input checked="" type="checkbox"/> YES |
| c) ensuring the periodic audit or evaluation of registry compliance with security provisions? (<i>Paragraph 2.4.8</i>) | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The paragraphs 56-59 of ‘Program Process’ V4.0 dated 11/02/2021 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Processes-v4.pdf>) require the following:

- (a) Within 15 calendar days of receiving notification that a request for registration of a project is considered submitted by the GCC Operations Team, the Project Owner(s) shall open an account in the GCC online Carbon Registry¹³, operated by IHS Markit¹⁴ on behalf of GCC Program, and accessible via IHS Markit website¹⁵.
- (b) To open an account in the GCC online Carbon Registry and become an Account Holder, Projects Owners shall: submit an online application form¹⁶ for opening an account; comply with the requisite Know-Your-Customer (KYC) checks; and pay the requisite one-time GCC Registry Account Opening Fee and the Annual Registry Account Maintenance Fee, as per the latest version of GCC Fee Schedule.¹⁷
- (c) Once a GCC Carbon Registry account is opened, all information regarding the status of projects owned by the Account Holder, including project documentation related to registration (PSF, Monitoring reports, GCC Verification Reports, etc.) and issuance of ACCs for each monitoring period, shall be available publicly on the GCC Carbon Registry, accessible via IHS Markit website.
- (d) With respect to the Steering Committee’s decisions regarding the request for registration of a project activity, the GCC Operations Team shall coordinate with the IHS Markit team to inform them of decisions to register projects and shall upload all pertinent documents for registered projects to the

¹³ GCC Carbon Registry public view website: <https://mer.markit.com/br-reg/public/public-view/#/account>

¹⁴ GCC has a contract with IHS market to provide the registry services. Refer to the Program Manual which provides more details of the GCC Registry

¹⁵ GCC Registry, accessible via IHS Markit website: <https://ihsmarkit.com/products/environmental-registry.html>

¹⁶ Online account application form: <https://mer.markit.com/br-reg/public/customer-registration.jsp>

¹⁷ GCC Fee Schedule: <http://www.globalcarboncouncil.com/gcc-fees/>

GCC Carbon Registry, operated by IHS Markit. Once details regarding a new project are entered, the registry software will generate a unique running reference number for the project, referred to as a Project Id.¹⁸ After this stage, Project Owner(s) shall submit all subsequent project documents via the GCC online Carbon Registry, accessible via IHS Markit website.

Each Project Owner (a registered business) has a separate account that holds all issued ACCs as stated by paragraph 56 of the GCC Projects Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>).

Also, GCC Program Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>) makes reference to paragraph 50-57 and footnote 12 and 13, which provides a link to the following:

- Terms and conditions governing the IHS Markit Registry (<https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>);

The above stated weblinks provide access to IHS Markets policies and procedural documents, which requires IHS market to conduct registry operations according to an established governance and code of conduct and defines policies and procedures to:

- (a) restrict the programme registry accounts to registered businesses;
- (b) ensure the screening of requests for registry accounts;
- (c) ensure that robust security provisions are in place;
- (d) describe process of the periodic audit or evaluation of registry compliance with security provisions;

Please also refer to ‘Re-assessment_Application_Form_Appendix_D_Emissions Unit Programme Registry IHSM’, attached with this application, which provides “Emissions Unit Programme Registry Attestation” and provides specific registry related information.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

Question 3.5 Legal nature and transfer of units

| | |
|---|---|
| Does the programme define and ensure the following: | |
| a) the underlying attributes of a unit? (Paragraph 2.5) | <input checked="" type="checkbox"/> YES |
| b) the underlying property aspects of a unit? (Paragraph 2.5) | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to

¹⁸ For each Project Id there will be a corresponding unique reference submission number (following the format SXXX) as per paragraph **Error! Reference source not found..**

follow-up discussions and written questions pertaining to this topic:

GCC Program Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>) makes reference to paragraph 52, 55 and footnote 12 and 13, which provides a link to the following:

- Terms and conditions governing the IHS Markit Registry (<https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>)

The above stated weblinks provide access to IHS Markets policies and procedural documents, which requires IHS market to conduct registry operations according to an established governance and code of conduct and defines policies and procedures to:

- (a) the underlying attributes of a unit;
- (b) the underlying property aspects of a unit;

Please also refer to 'Re-assessment_Application_Form_Appendix_D_Emissions Unit Programme Registry IHSM', attached with this application, which provides "Emissions Unit Programme Registry Attestation" and provides specific registry related information

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the Council's initial approval of programme eligibility (*if none, "N/A"*):

N/A

Question 3.6 Validation and verification procedures

| | |
|--|---|
| Are standards, requirements, and procedures in place for... (<i>Paragraph 2.6</i>) | |
| a) the validation of activities? | <input checked="" type="checkbox"/> YES |
| b) the verification of emissions reductions? | <input checked="" type="checkbox"/> YES |
| c) the accreditation of validators? | <input checked="" type="checkbox"/> YES |
| d) the accreditation of verifiers? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

GCC Program requires that projects and emission reduction claims are clearly, transparently and independently validated and verified by suitably qualified, independent organisations. This also includes published provisions to assess and avoid conflicts of interest for accreditation and oversight of validation and verification bodies. The GCC Program has developed standards, requirements, and the procedures are in place for:

VERIFICATION:

- (a) the validation of activities ("Validation" is referred as "Project Verification" under GCC Program)

(b) the verification of emissions reductions: (“Verification” is referred as “Emission Reduction Verification” under GCC Program)

- The overview and requirements of the processes of the “Project Verification” and “Emission Reduction Verification” are provided in GCC Program Framework, V2.1, paragraph 29-35 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Framework-v2.1.pdf>) and in Program Manual, V3.1, paragraph 38-41 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>).
- All verifiers must follow Verification Standard, V3.1 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Verification-Standard-v3.1.pdf>) that contains the requirements of GCC Project Verification and Emission Reduction Verification.
- Additional verification requirements are contained in Clarification No.1, V1.1 dated 02/01/2022, paragraphs 23-24, footnote 8, 29, 32-34 (<https://www.globalcarboncouncil.com/wp-content/uploads/2022/01/Clarification-No.-01.pdf>).
- The verifier templates for project verification and emission reduction verification (containing CORSIA eligibility requirements) are available at <http://www.globalcarboncouncil.com/resource-centre/>

APPROVAL OF GCC VERIFIERS:

(a) the accreditation of validators: (“Validators” are referred as “GCC Project Verifier” under GCC Program)

(b) the accreditation of verifiers: (“Verifiers” are referred as “GCC Emission Reduction Verifiers” under GCC Program)

- The GCC Verifiers applications are processed as per the ‘Procedure for approval of GCC Verifiers’ and applications are assessed to verify compliance to the approval criteria as well as the procedure: <https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/procedure-for-approval-of-gcc-verifiers-v2.2.pdf>
- All Verifiers sign an agreement with GCC Program that legally binds them towards their obligation for GHG reduction project verification and emission reduction verification. Agreement Template and Verifier application form are available at <http://www.globalcarboncouncil.com/resource-centre/>

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

Please refer to **Part 5** of this document and **Annex 1** below, which provides the details of all changes to the GCC Program, since the last submission to the TAB/CORSIA.

Since the last submission to the TAB/CORSIA, the following changes were introduced containing requirements related to programme elements described in section “A” above.

- New regulatory document introduced GCC Program: This introduces additional verification requirements as are contained in Clarification No.1, V1.1 dated 02/01/2022, paragraphs 23-24, footnote 8, 29, 32-34 (<https://www.globalcarboncouncil.com/wp-content/uploads/2022/01/Clarification-No.-01.pdf>).
- Revised regulatory document released by GCC Program: The Procedure for Approval of GCC

Verifiers, V2.2 dated 12/04/2021 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/procedure-for-approval-of-gcc-verifiers-v2.2.pdf>) is released, which contains editorial changes (removing requirements on verification fee).

Question 3.7 Programme governance

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

Provide evidence that this information is available to the public:

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

- Governance framework is formed following International Protocol, especially CDM.
- Independent, experienced and renowned international carbon market experts formulate the Steering Committee that takes decisions on regulatory documents, projects and methodologies. Refer <https://www.globalcarboncouncil.com/governance/steering-committee/>
- Six regionally and internationally renowned strategic experts from diverse fields are members of GCC Advisory Board, giving strategic direction to GCC Program. Refer <https://www.globalcarboncouncil.com/governance/advisory-board/>
- Independent and highly experienced GCC approved verifiers (accredited by CDM and national accreditation bodies or NABs). One verifier is approved (ESPL, India) Refer <https://www.globalcarboncouncil.com/governance/gcc-verifiers/>
- Applications of two more applicant verifiers are under evaluation (EPIC Sustainability, India and Verico SCE, Germany). Several other verifying organizations are considering applying for GCC membership.
- GCC Operations Team (GCC Secretariat) is comprising of highly-skilled carbon market experts who have background of working at CDM Methodologies Team, CDM Project Registration & Issuance Team, CDM Accreditation Team, CDM Stakeholders Team of UNFCCC Secretariat and in various Panels of CDM (CDM Methodologies Panel, CDM Accreditation Panel, etc.).
- Program Manual (refer section 9) and Program Process (refer paragraph 12 and 105 and section 3,1,2) provides requirements of GCC Program on Local and Global Stakeholder Consultation on projects and methodologies.
- Refer section G (Local Stakeholder Consultation) of Instructions to Complete the Project Submission Form available at <https://www.globalcarboncouncil.com/framework/program-forms-templates/>. The section defines the process and aspects of local stakeholder consultation.
- 15-days Global Stakeholder Consultation (GSC) on submitted GCC projects is mandatory as per section 3.1.2 of Program Processes document. The global stakeholder inputs are taken in account by GCC verifier in the project verification and by GCC Operations Team and Steering Committee in project evaluation. Following webpage of GCC website is designed to invite global stakeholder

comments on the projects: <https://www.globalcarboncouncil.com/global-stakeholders-consultation/>. It should be noted that the submissions are received for four projects which are undergoing GCC Operations Team’s Completeness check. Soon, following the Completeness Check, projects will be available for receiving global stakeholders’ inputs.

- As per paragraph 105 of section 4.2 of GCC Program Processes document, Draft GCC methodologies shall be made available on the GCC website for public consultation for a period of 15 calendar days, after which the GCC Operations Team shall revise the methodology taking into account received public inputs. Following webpage of GCC website is designed to invite public inputs on methodologies: <https://www.globalcarboncouncil.com/standards/baseline-monitoring-methodologies/#1633981295919-60acee06-bcc3> .
- GCC Program Processes document is available at <https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Processes-v4.pdf> .
- Refer section D.9 of Project Verification Report Template at <https://www.globalcarboncouncil.com/framework/program-forms-templates/> requiring GCC Verifier to explain how global stakeholder inputs received on project are accounted for in the project verification.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

Some minor changes are done since last submission.

Advisory Board is now expanded to eight members now (from previous six members). Two new Advisory Board Members selected (Mr. Saurabh Kumar and Dr. Massamba Thioye) <http://globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Advisory-Board.pdf>

Two new members will be added to Steering Committee in coming two months.

There are four new verifiers approved bringing the total of approved GCC Verifiers to six <https://www.globalcarboncouncil.com/governance/gcc-verifiers/>

The GCC documentation is due for change in 2022 in view of new clarification 1 released. There is no need of material change request as these changes are just clarificatory in nature. However, for new regulatory framework planned for AFLOU (Nature-based solutions) and carbon capture & storage projects, a material change request will be sent to TAB of CORSIA in due course.

| | |
|---|---|
| Can the programme demonstrate that it has... (<i>Paragraph 2.7.2</i>) | |
| a) been continuously governed for at least the last two years? | <input checked="" type="checkbox"/> YES |
| b) been continuously operational for at least the last two years? | <input checked="" type="checkbox"/> YES |
| c) a plan for the long-term administration of multi-decadal programme elements? | <input checked="" type="checkbox"/> YES |

| | |
|---|---|
| d) a plan for possible responses to the dissolution of the programme in its current form? | <input checked="" type="checkbox"/> YES |
|---|---|

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

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Global Carbon Council (GCC), MENA's regions first Voluntary Carbon Market Program, was founded and established in 2016 by Gulf Organisation for Research & Development (GORD) and was financially supported by Supreme Committee for Delivery and Legacy, a government organization, for delivery of Carbon Neutrality¹⁹ of FIFA²⁰ World Cup in Qatar in year 2022.

GLOBAL CARBON COUNCIL LLC (the "GCC") is an initiative of Gulf Organization for Research and Development (GORD), and an independent, organization, incorporated, licensed and registered²¹ under Qatar Financial Center (QFC Number 00794) in Doha, Qatar whose registered office and physical office is at Global Carbon Council (GCC), Amwal Tower, Building No. 58, Floor No 15, Unit A, Alwehda Street, Street No. 820, Zone 61, Aldafna, Doha, Qatar (PO Box- 5543), website: <https://www.globalcarboncouncil.com/>

Gulf Organisation for Research & Development (GORD) which is the subsidiary of Qatari Dial Real Estate Company (QD), a fully owned Qatar Government Organization. GORD has a history of 11 years of operation and Qatari Diar was established in 2005. Qatari Diar is fully owned by Qatar Investment Authority, which is Qatar Government's sovereign fund. As of year 2020, Qatari Diar has a shared capital of US \$8 billion, With 50 investment projects under development held in 22 countries around the world, combining an investment value of around US\$35 billion.

Plan for long-term administration of GCC Program:

In year 2014 GORD conceptualized the plan of initiating a Carbon Market primarily serving MENA region as well as has an aim to have global reach. GCC Program was established in 2016 and is fully active and operational since 2016 and will continue to operate and grow year by year.

In view of the significant role that carbon market plays in climate mitigation, GCC Program looks forward to operating the carbon offsetting program for several decades. Following are the elements that strengthen the plan for long-term administration of GCC Program, which also assist to demonstrate that dissolution of GCC Program is a remote possibility for decades to come.

(a) GCC Program, as indicated above, has strong organizational and institutional support that reduces uncertainty and assures longevity of program.

(b) GORD is already operating its flagship Green Building Certification Program (Global Sustainability Assessment System or GSAS) since 2009 and has registered more than 900 building and infrastructure projects. Therefore, GORD has experience of designing and operating regulatory frameworks for more than a decade. GCC's secretariat engages with its highly professional and experienced Advisory Board that provides the strategic advice and direction to GCC Program. The Board members represent the rich mix of local and international personalities and are elected based on their experience and merit.

¹⁹ Supreme Committee for Delivery and Legacy: <https://www.qatar2022.qa/en>

²⁰ FIFA World Cup: <https://www.fifa.com/worldcup/news/gord-to-support-delivery-of-qatar-s-carbon-neutral-fifa-world-cuptm>

²¹ QFC: <https://eservices.qfc.qa/qfcpublicregister/PublicRegisterDetails.aspx?firmid=102030>

- (c) We believe that GHG Programs with strong foundations are here to stay for decades especially since the net-zero world by 2050 requires 58-60 GT CO₂e reductions per year and if just 5% of this comes from carbon markets, all the GHG Programs shall require to deliver 2.5 to 3 GT offsets per year (in addition to projected CORSIA demand of 2.5 Billion offsets until 2035), which sets a gigantic task for all GHG programs in the world. The interests from the Project Owners from across the world is rising in GCC Program day-by-day which will not only catalyze carbon offsetting activities but will help GCC Program become self-sufficient in years to come, since GCC Program will recover its administration fees from registered projects and issued ACCs.
- (d) Many project supporters (carbon credit buyers) including leading banks are interested to participate in the GCC Program to provide their contribution in achieving carbon neutral growth. These financial institutions have offered the role as retail aggregator of carbon credits reflected on GCC's carbon registry to facilitate the carbon market operation. This brings the stability and multi-stakeholder involvement into the carbon market on long term basis.
- (e) GCC Program also issues the sustainability labels, and labels towards environmental and social safeguard to the projects based on ex-post monitoring every year. This is a key deliverable for the NDCs and the mitigation outcomes under Paris Agreement and is important for green economy and long-term sustainable development of the country/region.
- (f) GCC's crediting period for issuance of carbon credits is fixed for 10 years, without the possibility of renewal. Although, this is purely done for environmental integrity reasons, it also limits liability of GCC to issue credits up to 10 years as compared to other GHG Programs.
- (g) Being the only one GHG Program in the MENA region, we believe that the Program will be grandfathered to preserve the institutional capacity that has been developed over the years. We believe that many organizations from the world will support the first and only GHG program in the MENA region. We have yet not started the outreach and collaboration activities, which are planned from 2021 onwards.

Consequences of unforeseen dissolution of GCC Program:

Although dissolution of GCC Program is extremely unlikely, due to various reasons explained above, the occurrence of such an unforeseen event will be classified as 'force majeure' as it is beyond the control of GCC Program or IHS Markit and is common risk for all entities or organisations anywhere in the world. GCC Program has a valid professional liability insurance policy covering liability of more than 5 Million USD, the copy (Refer to attached **Annex 6**) of which has been submitted earlier to TAB. This insurance, to a certain extent, may help to cover liabilities due to such unforeseen events. For coverage beyond this insurance cover, GCC Program has established procedures that require signed agreements with GCC Verifiers and the Project Owners to cover any residual liability that may arise due to any such events, including the force majeure.

Following sequence of events will take place in the event of any foreseen dissolution for GCC Program, in order to secure "assets" generated and protect the interests of the Project Owners.

- (a) There will not be any impact on the status of projects already registered. These projects will be available in the registry operated by IHS Markit, as long as the annual fee will continue to be paid to IHS Markit.

- (b) The ACCs already issued will continue to have value and will be available in the registry operated by IHS Markit, as long as the annual fee will continue to be paid to IHS Markit.
- (c) GCC Program shall develop a “project deregistration procedure” and the project shall require deregistering from GCC to get registered to other programs. This will not only be done in view of possible dissolution, but to give Project Owners a choice to deregister the projects for any legitimate reason. Following the deregistration of the project the ACCs, which have not been issued for the remaining crediting period, may be allowed to be grandfathered and transferred to another GHG program, which is willing to adopt them.
- (d) There will be a “cooling off period” in which handover of the GCC Program may be initiated by GCC to another recognized and reputed entity that can completely take charge of the Program, register new projects and issue ACCs for new projects as well as already registered projects. During this period GCC will ensure to maintain sufficient staff to steer through the handover process effectively. Alternatively, as mentioned above, the “grandfathering” provisions for ACCs may be put in place by GCC allowing to transfer the ACCs to other programs.

Having said that, GCC Program has high level of confidence on the positive course of action that is based on firm footing of continuation and growth of registration and issuances to support the mitigation of climate change.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

| | |
|---|---|
| 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? (<i>Paragraph 2.7.3</i>) | <input checked="" type="checkbox"/> YES |
| b) ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated? (<i>Paragraph 2.7.3</i>) | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The terms and conditions governing the IHS Markit Registry are available at the following link: <https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>.

Additionally, information on IHS Markit’s governance and code of conduct is available here: <http://investor.ihsmarkit.com/phoenix.zhtml?c=188457&p=irol-govhighlights>

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

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

Provide evidence of such coverage:

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

GCC Program has a valid professional liability insurance policy covering liability of more than 5 Million USD, the copy (Refer to attached Annex 6). GCC program foresees that its decision about the registration of projects and issuance of carbon credits are based on verifiable evidence provided by GCC-approved verifiers and professional judgement of Steering Committee as well as that of GCC secretariat.

Since Verifier’s evidence is key in making decision, GCC program requires that the organization-category verifiers shall have liability insurance covering damages up to USD 5 Million towards any false or erroneous evidence of carbon emission reductions whose issuance as ACCs may potentially lead to a loss of credibility to GCC Program as well as to project supporter (or carbon credit buyer). This is covered in GCC Verifier agreement template available at <https://www.globalcarboncouncil.com/framework/program-forms-templates/>.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A. The professional liability insurance policy is attached with the submission. This is the confidential document only for consideration of TAB and ICAO team.

Question 3.8 Transparency and public participation provisions

| | |
|--|---|
| Does the programme publicly disclose... (<i>Paragraph 2.8</i>) | |
| a) what information is captured and made available to different stakeholders? | <input checked="" type="checkbox"/> YES |
| b) its local stakeholder consultation requirements (if applicable)? | <input checked="" type="checkbox"/> YES |
| c) its public comments provisions and requirements, and how they are considered (if applicable)? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Public information

Following information is captured and made available to public at <https://www.globalcarboncouncil.com/> as well as GCC webpage on IHS MarkIt carbon registry platform.

1. Entire documentation framework of GCC including framework documents, procedural documents, requirement documents, information documents, forms and templates.
2. Baseline and monitoring methodologies approved by GCC Program.
3. Submitted project name, project document, calculations and all relevant submission documents that are not confidential in nature.
4. GCC decisions on the project, GCC Steering Committee report, GCC Advisory Board report
5. Project verification report by GCC-approved verifier
6. Registered project details, its expected emission reductions and its likely sustainability rating and environmental and social safeguard rating.
7. Monitoring report by project owner for each monitoring period
8. ACCs issued to projects in each monitoring period and sustainability rating and environmental/social safeguard ratings of projects
9. The details of the projects rejected by GCC.
10. Details on transferred credits and retired/cancelled carbon credits.

Local Stakeholders Consultation

The Project Submission Form (Available at <https://www.globalcarboncouncil.com/framework/program-forms-templates/>) includes the requirements for local stakeholder consultation and provides necessary instructions to conduct such consultation.

Global Stakeholders (public) Involvement

New methodologies developed by GCC operations team (GCC secretariat) with or without the involvement of external expert will be made available for 15-day global stakeholder consultation via public call on GCC website and by circulating through Climate-L mail list of IISD. All the relevant comments received will be taken into account by GCC operations team before it is forwarded to appointed Steering Committee member and then subsequently to Steering Committee. Public consultation page is [here](#)

The submitted project documentation that has qualified completeness check will be made available on GCC website for 15 days and by circulating through Climate-L mail list of IISD for receiving global stakeholder inputs. GCC verifiers will take these inputs into account in the process of project verification. Global stakeholders consultation page is [here](#).

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
N/A

| | |
|---|---|
| Does the programme conduct public comment periods relating to... (<i>Paragraph 2.8</i>) | |
| a) methodologies, protocols, or frameworks under development? | <input checked="" type="checkbox"/> YES |

| | |
|--|---|
| b) activities seeking registration or approval? | <input checked="" type="checkbox"/> YES |
| c) operational activities (e.g., ongoing stakeholder feedback) | <input checked="" type="checkbox"/> YES |
| d) additions or revisions to programme procedures or rulesets? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

As stated in response to previous questions, public consultation is conducted on submitted projects and developed methodologies for 15 days each.

Public consultation page for projects is available [here](#).

Global stakeholders consultation page for methodologies is available [here](#).

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

Question 3.9 Safeguards system

| | |
|--|---|
| Are safeguards in place to address... (<i>Paragraph 2.9</i>) | |
| a) environmental risks? | <input checked="" type="checkbox"/> YES |
| b) social risks? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Environment and Social Safeguards Standard of GCC (available at <https://www.globalcarboncouncil.com/standards/environment-and-social-standard/>) provides the process, by integrating this requirement in GCC Registration and Issuance process:

- (a) To identify Environmental and Social impacts caused as a result of the construction and operations of the project activity;
- (b) To conduct ‘Do-No-Harm’ Risk Assessment to determine impacts that are categorised as ‘Harmful’;
- (c) To develop actions plans to contain or reduce or eliminate those impacts identified as ‘Harmful’;
- (d) To provide a framework of monitoring of the actions plans and its targets; and
- (e) To ensure Verification by the GCC Verifier to certify that the GCC project activity causes no net-harm to Environment and Society.

This standard provides requirements to establish Safeguards for Environmental and Social impacts for:

- (a) Project owners to develop a plan and report in the GCC Project Submission Form (PSF) and allow the possibility to submit request for registration to GCC after a third-party project verification by approved GCC verifier;
- (b) Project owners to implement the plan and to conduct monitoring as described in the registered project documentation and report the outcome in the GCC Monitoring Report and allow the possibility to submit request for issuance to GCC after a third-party Emission Reduction verification by approved GCC verifier; and
- (c) GCC Verifier to verify whether the project activity does not cause any net-harm to Environment and Society and to allow the possibility to achieve additional certification.

The publicly available details of approved project will include the likely environmental and social safeguard rating of project (E+ or S+). This rating will be verified by GHG emission reduction verifier and publicly displayed by GCC (IHS MarkIt) after each monitoring period based on its sustainability performance in respective period.

| Design Elements in line with EUC | Summary of design elements of GCC Program that ensure compliance with EUC |
|---|--|
| Environmental and Social Safeguards System | <ul style="list-style-type: none"> ▪ GCC Projects intending to meet CORSIA eligibility for its GCC-issued carbon credits must comply with ‘environmental no-net-harm’ and ‘social-no-net-harm’ criteria. The projects that intends to receive E+, S+ labels and “CORSIA Eligibility Flag” of GCC Program shall follow the requirements of Environment & Social Safeguard Standard that is referred through Project Standard. ▪ Environment & Social Safeguard Standard requires ex-ante determination of how project will achieve no-net-harm in the Project Submission Form and ex-post monitoring and verification of project for demonstration of no-net harm to environment and society on continuous basis. ▪ Section 5 of Project Standard stipulates that E+/S+ labels are voluntary requirement for selection, but become mandatory requirements, if selected. The standard provides reference to Environment & Social Safeguard Standard for implementation and monitoring requirements for E+/S+ labels. ▪ Refer the Project Standard available at https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Standard-v3.1.pdf . ▪ Refer Environment & Social Safeguard Standard available at https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Environment-and-Social-Safeguards-Standard-v2.pdf . ▪ Refer section E (and its instructions) of Project Submission Form available at https://www.globalcarboncouncil.com/framework/program-forms-templates/ |

| Eligibility Criteria that emission units: | Summary of GCC Rules that ensure compliance of GCC Program with ‘Carbon Offset Credit Integrity Assessment Criteria’ |
|---|---|
| Do no net harm. | <p>Issued Verified Carbon Offsets from GCC Projects for the purposes of CORSIA will not cause net harm to environment and society and shall contribute to the achievement of UN Sustainable Development Goals as:</p> <ul style="list-style-type: none"> ▪ Project Standard (<i>refer to paragraph 2 and 14, c</i>) requires Projects Owners to comply with the GCC Rules so that the proposed projects: <ul style="list-style-type: none"> (a) do not cause any net harm to the environment and society, by applying the GCC Environmental and Social Safeguards Standard (https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Environment-and-Social-Safeguards-Standard-v2.pdf), and enable Project Owners to demonstrate this achievement by obtaining additional GCC certification labels: (i) the Environmental No-net-harm Label (E⁺); and (ii) the Social No-net-harm Label (S⁺); and (b) contribute to achieving the United Nations Sustainable Development Goals (SDGs), by applying the GCC <u>Project Sustainability Standard</u> (https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Sustainability-Standard-v2.1.pdf), and enable Project Owners –depending on the number of SDGs that the project contributes to – to demonstrate this achievement by obtaining additional SDG certification labels (SDG⁺). ▪ Project Standard (<i>refer to paragraph 25</i>) requires projects to use the latest versions of the Project Submission Form (PSF) <u>template</u> (https://www.globalcarboncouncil.com/framework/program-forms-templates/) to provide information on environmental and social impacts and safeguards (<i>refer section E of PSF template and section E page 51 of the instructions therein</i>) and contribution to UN SDGs (<i>refer section F of PSF template and section F page 51 of the instructions therein</i>). |

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
N/A

Question 3.10 Sustainable development criteria

| | |
|--|---|
| Does the programme use sustainable development criteria? (<i>Paragraph 2.10</i>) | <input checked="" type="checkbox"/> YES |
| Does the programme have provisions for monitoring, reporting and verification in accordance with these criteria? (<i>Paragraph 2.10</i>) | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Information as per original application :

Project Sustainability Standard (available at <https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Sustainability-Standard-v2.1.pdf>) provides requirements for sustainability of projects based on contributions made towards achievement of *United Nations Sustainable Development Goals* (SDGs). This standard mentions how to integrate SDGs into GCC project development thereby catalysing climate action and contributing to global objective of meeting *Sustainable Development Goals*. The application of this standard is not mandatory for all GCC Projects and the project owners may choose to voluntarily apply this standard to demonstrate the level of contribution of the project to SDGs and accordingly indicate their choice in the project submission form (PSF), which shall be verified ex-post by approved GCC Verifiers. However, this standard is mandatory for project owners seeking to sell their carbon credits to international airlines for CORSIA compliance purposes.

This standard has been developed based on the requirement of the ‘*Standard on Project requirements and Development of Methodologies*’ (v2.0 – 2019) (or Methodology Development Standard) and therefore the requirements stipulated in Methodology Development Standard shall also be applicable when using or applying this standard to GCC projects.

The publicly available details of approved project will include the likely sustainability rating of project (bronze, silver, gold, platinum or diamond). This rating will be verified by GHG emission reduction verifier and publicly displayed by GCC (IHS MarkIt) after each monitoring period based on its sustainability performance in respective period.

| Design Elements in line with EUC | Summary of design elements of GCC Program that ensure compliance with EUC |
|----------------------------------|---|
| Sustainable Development Criteria | <ul style="list-style-type: none"> ▪ GCC Projects intending to meet CORSIA eligibility for its GCC-issued carbon credits must contribute to achievement of more than one UN-SDGs. This is in addition to UN-SDG # 13 on Climate Action that a GHG reduction project naturally contributes to. The projects that intends to receive SDG+ label and “CORSIA Eligibility Flag” of GCC Program shall follow the requirements of Project Sustainability Standard that is referred through Project Standard. ▪ Project Sustainability Standard requires ex-ante determination of how many SDGs the project aims to address and how it will contribute to achievement of different SDGs. The Standard also requires ex-post monitoring and verification of project for demonstration of contribution of project towards achievement of SDGs on continuous basis. Depending upon the number of SDGs that project contributes to, the quality of SDG+ label is determined that varies from Bronze to Diamond. ▪ Section 5 of Project Standard stipulates that SDG+ labels are voluntary |

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| | <p>requirement for selection, but become mandatory requirements, if selected. The standard provides reference to Project Sustainability Standard for implementation and monitoring requirements for SDG+ label.</p> <ul style="list-style-type: none"> ▪ Refer the Project Standard available at https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Standard-v3.1.pdf . ▪ Refer Project Sustainability Standard available at https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Sustainability-Standard-v2.1.pdf ▪ Refer section F (and its instructions) of Project Submission Form available at https://www.globalcarboncouncil.com/framework/program-forms-templates/ |
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| Eligibility Criteria that emission units: | Summary of GCC Rules that ensure compliance of GCC Program with ‘Carbon Offset Credit Integrity Assessment Criteria’ |
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| Do no net harm. | <p>Issued Verified Carbon Offsets from GCC Projects for the purposes of CORSIA will not cause net harm to environment and society and shall contribute to the achievement of UN Sustainable Development Goals as:</p> <ul style="list-style-type: none"> ▪ Project Standard (<i>refer to paragraph 2 and 14, c</i>) requires Projects Owners to comply with the GCC Rules so that the proposed projects: <ul style="list-style-type: none"> (c) do not cause any net harm to the environment and society, by applying the GCC Environmental and Social Safeguards Standard (https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Environment-and-Social-Safeguards-Standard-v2.pdf), and enable Project Owners to demonstrate this achievement by obtaining additional GCC certification labels: (i) the Environmental No-net-harm Label (E⁺); and (ii) the Social No-net-harm Label (S⁺); and (d) contribute to achieving the United Nations Sustainable Development Goals (SDGs), by applying the GCC <u>Project Sustainability Standard</u> (https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Sustainability-Standard-v2.1.pdf), and enable Project Owners –depending on the number of SDGs that the project contributes to – to demonstrate this achievement by obtaining additional SDG certification labels (SDG⁺). ▪ Project Standard (<i>refer to paragraph 25</i>) requires projects to use the latest versions of the Project Submission Form (PSF) <u>template</u> (https://www.globalcarboncouncil.com/framework/program-forms-templates/) to provide information on environmental and social impacts and safeguards (<i>refer section E of PSF template and section E page 51 of the instructions therein</i>) and contribution to UN SDGs (<i>refer section F of PSF template and section F page 51 of the instructions therein</i>). |

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

Only one small change is made based on TAB’s condition for final approval of GCC Program. As per CORSIA requirements mentioned in [Clarification-1](#), the Project Activity applying to CORSIA label (C+) must make contributions for achieving United Nations Sustainability Development Goals (SDGs) and has contributed to achieving at least three SDGs and therefore targets to achieve **Silver or higher SDG certification label** (SDG+). In next few months, this clarification will be incorporated in GCC documentation, which include Project Standard and Project Submission Form.

Question 3.11 Avoidance of double counting, issuance and claiming

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| Does the programme use sustainable development criteria? (<i>Paragraph 2.10</i>) | <input checked="" type="checkbox"/> YES |
| 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? (<i>Paragraph 2.11</i>) | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Sustainable Development Criteria

Project Sustainability Standard (available at <https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Sustainability-Standard-v2.1.pdf>) provides requirements for sustainability of projects based on contributions made towards achievement of *United Nations Sustainable Development Goals* (SDGs). This standard mentions how to integrate SDGs into GCC project development thereby catalysing climate action and contributing to global objective of meeting *Sustainable Development Goals*. The application of this standard is not mandatory for all GCC Projects and the project owners may choose to voluntarily apply this standard to demonstrate the level of contribution of the project to SDGs and accordingly indicate their choice in the project submission form (PSF), which shall be verified ex-post by approved GCC Verifiers. However, this standard is mandatory for project owners seeking to sell their carbon credits to international airlines for CORSIA compliance purposes.

This standard has been developed based on the requirement of the ‘[Standard on Development of Methodologies](#)’ (v3.0) and therefore the requirements stipulated in the Standard shall also be applicable when using or applying this standard to GCC projects.

The publicly available details of approved project will include the likely sustainability rating of project (bronze, silver, gold, platinum or diamond). This rating will be verified by GHG emission reduction verifier and publicly displayed by GCC (IHS MarkIt) after each monitoring period based on its sustainability performance in respective period.

Double counting, issuance and claiming

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| <p>Avoidance of Double Counting, Issuance and Claiming</p> | <ul style="list-style-type: none"> ▪ Paragraph 70 of section 10.2 of GCC Program Manual (Available at https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf) provides safeguard against over issuance due to: (i) double issuance by GCC Program; (ii) double issuance by other GHG program; (iii) Double use and double sell. The safeguards are either in the form of a special features of GCC carbon registry in preventing over issuance, or the processes followed by GCC Program in preventing double issuance or double claim. The section also contains procedures to replace the deficient or double counted offset units (ACCs). ▪ For projects intending to supply CORSIA-eligible units, GCC Program clearly requires declaration of no-double counting from national authorities, through host country attestation for CORSIA-eligible units. Refer Section A.6 (c) in instructions to fill Project Submission Form available at https://www.globalcarboncouncil.com/framework/program-forms-templates/. |
| <p>Are only counted once towards a mitigation obligation</p> | <p>The Issued Verified Carbon Offsets from GCC Projects are only counted once towards a mitigation obligation. GCC Program has developed policies and procedures to prevent double counting and over issuance and has established procedures to replace the deficient or double counted offset units (ACCs) as required by GCC Program Manual (refer to section 10.2): https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf</p> |
| <p>Host country written attestation to the avoidance of double-claiming</p> | <p>Issued Verified Carbon Offsets from GCC Projects prevent double counting as:</p> <ul style="list-style-type: none"> ▪ Project Standard (refer to paragraph 14, c, v) requires Projects Owners to comply with the GCC Rules related to submission of Host Country Attestation on Double Counting as and when required by CORSIA (mandatory requirement for projects that intend to use ACCs for CORSIA). ▪ Project Standard (refer to paragraph 25) requires projects to use the latest versions of the Project Submission Form (PSF) template to provide information on demonstration of the avoidance of double counting to ensure that the offsets are counted only once towards a mitigation obligation (refer section A.6 of PSF template and section A.6. page 42 of the instructions therein). ▪ PSF template (refer section A.6) requires to demonstrate compliance with the double counting requirements of CORSIA on project to project basis and requires Project Owners to: “Obtain and provide to the GCC Program and its Registry (IHS Markit), a written attestation from the host country’s national focal point or focal point’s designee, as required by CORSIA Emissions Unit Criteria (paragraph 7 (c) of Carbon Offset Credit Integrity Assessment |

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| | <p>Criteria) and 'Programme Application Form – Appendix A – Supplementary Information Form ' (refer section 3.7.8. with respect to- Host country attestation to the avoidance of double-claiming) in which shall be made publicly available prior to the use of units from the host country in the CORSIA.” Therefore, the onus lies on the Project Owner to comply with this requirement.</p> <ul style="list-style-type: none"> ▪ The host country attestation procedure is under consideration of GCC Program. Following points are being discussed in this regard. <ol style="list-style-type: none"> 1. The provisions in GCC Program documents as mentioned above require Host country written attestation for the avoidance of double-claiming, as a pre-requisite for use of the emission units for offsetting under CORSIA and shall be provided to GCC Program either by the Project Owner or the Airline operator wishing to buy the offsets, based on a direct contract between them. Without such host country attestation, GCC Program will not flag the emission units generated from the projects as 'CORSIA compliant' in the registry. This will ensure that offsets from GCC Projects are counted only once towards a mitigation obligation. 2. In the event that the emission reduction offsets sold by the Project Owner to an airline is double claimed by a host country, it is an issue in which the three parties including Project Owner, the Airline operator or the Host Country are involved. Since GCC Program shall not be a party to such carbon offset selling/purchasing contracts, the Program does not have liability nor it requires any procedure for replacing such emission reduction offset units. However, if the offset units sold to an airline by the individual Project Owners is double claimed by a host country, despite providing a Host country attestation to the project, the host country is responsible for replacing the deficient or double counted offset units. In such circumstances, the GCC program does not have authority to challenge the host countries. ▪ Therefore, GCC Program believes that ICAO and TAB may be in best position to develop the common guidelines for eligible GHG Programs to develop global procedure, considering that some situations may be out of control and influence of GHG Programs. ▪ GCC Program stands committed to implement all possible options given that it has authority to do so. If “replacement of offset units” is an option as a remedy for double claimed units, GCC Program has the ability and the flexibility to allow transfer of such replaced units through its registry. |
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B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

On **Sustainable Development** as mentioned in response to previous question that Clarification-1 now

mentions that minimum requirement of **SDG+ Silver** label for claiming CORSIA label (C+).

On **Double counting, issuance and claiming** GCC Program has developed the guideline on avoidance of double accounting (available at <http://www.globalcarboncouncil.com/resource-centre/>), which is being submitted for consideration of TAB-CORSIA along with this submission.

The guideline on avoidance of double accounting conforms to the requirements of Decision -/CMA.3, Guidance on cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement (referred as Article 6.2 of Paris Agreement)²² as well as good practice established under Guidelines²³ on Avoiding Double Counting and the requirements of the International Civil Aviation Organization (ICAO)'s Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) scheme²⁴. According to this guideline host country letter of authorization is required for issuance of CORSIA eligible units beyond 2021 vintages. It is the responsibility of project owner to submit the letter along with the request for registration and/or each request for issuance. Following Article 6.2 guidance host country must agree to apply corresponding adjustments to national GHG inventory by corresponding amount of units issued. However, as per COP26 decision on Article 6.2, it is the host country's responsibility to ensure that no double claiming is done under NDCs for the emission reductions from the GCC registered projects for which the host country has provided the letter of authorization to GCC. If the letter is issued at the stage of specific issuance, the host country must ensure that no emission reductions from the corresponding monitoring period of project are claimed under NDC.

²² https://unfccc.int/sites/default/files/resource/cma3_auv_12a_PA_6.2.pdf

²³ <https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/guidelines-for-adc-with-corsia-june-2019.pdf>

²⁴ <https://www.icao.int/environmental-protection/CORSIA/Pages/default.aspx>

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

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| Do the Programme’s carbon offsets... (<i>Paragraph 3.1</i>) | |
| 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? | <input checked="" type="checkbox"/> YES |
| b) exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

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| Are additional | <p>The Issued Verified Carbon Offsets from GCC Projects will be additional due to the following reasons:</p> <ul style="list-style-type: none"> ▪ GCC Program requires projects to demonstrate compliance with the requirements of demonstration of additionality (<i>refer section 6.4.8 of Project Standard</i>), which requires the Project Owners to demonstrate that anthropogenic GHG emissions are less than those that would have occurred in the absence of the Project Activity. The Project Standard requires projects to apply various approaches including requirements of the CDM or GCC Methodologies, CDM Tools (including Additionality tool, Investment analysis, Common Practice) and/or Positive Lists, ‘Legal Requirement Test’, etc. |
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- 1. As per Principles quoted in section 3 of Project Standard, GHG emission-reduction projects that are implemented as the result of an enforced legal mandate (government regulation, law) cannot be submitted to the GCC as emission-reduction projects.
 - 2. Specific eligibility criteria for Type-A projects as per section 5.2 of Project Standard requires that the Project Owner shall demonstrate that the Project Activity is not required by a legal mandate and does not implement a legally enforced mandate (government regulation or law);
 - 3. The 'Legal Requirement Test' is the first step for demonstration of additionality under GCC Program (refer section 6.4.8 of Project Standard),. Therefore, such projects that are implemented as the result of an enforced legal mandate (government regulation, law) are not eligible under GCC Program as per the 'Legal Requirement Test' for demonstration of additionality (refer to section 3 (e) of Project Standard).
 - 4. This proves that in case there is a mandate enforced by government requiring emission reductions, projects merely meeting the mandate cannot be submitted to GCC Program, unless the Project exceeds the requirements imposed by the law.
- 1. The Standard for Development of Methodologies (section 3.5) and the Program Processes (refer section 4) provides requirements for development of GCC Methodologies, including the requirements on additionality. The List of approved GCC Methodologies are available on GCC website and list of and approved CDM Methodologies and CDM Tools are publicly available on UNFCCC website.
 - 2. Project Standard (refer to paragraph 25) requires projects to use the latest versions of the Project Submission Form (PSF) **template** to provide information on demonstration of additionality (refer section B.5 of PSF template and section B.5 of the instructions therein).
 - 3. GCC Program requires approved GCC Verifiers to conduct third-party independent verifications (refer paragraph 62 of Verification Standard) of GCC Project Activities as per the requirements in the Project Standard, including the requirements for demonstration of additionality.
 - 4. Verification Standard (refer to paragraph 17) requires GCC Verifiers to use the latest versions of the Project Verification Report template (PVR)

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| | <p>template to report and certify the demonstration of additionality by the proposed project activity prior to project registration stage (refer section D.3.5 of PVR and section D.3.5 page 20 of the instructions therein).</p> |
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B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (if none, “N/A”):
 In line with TAB’s condition for GCC approval the regional positive list (name of countries) is deleted from baseline and monitoring methodology [GCCM001](#).

While submitting original application and responses in 2020, GCC did not have many projects received therefore we could not provide the evidence how the GCC Operations Team evaluates the projects at various stages of completeness checks, request for registration and request for issuance. As on date GCC has received 194 GHG reduction projects from various countries, two projects are registered, and one issuance is completed. We have provided the information on the complete cycle of assessment for sample projects. This evidence is included in “**Part 5: Programme Comments**” of this form. The links to project verification and emission reduction verification reports are also provided to reflect the work done by GCC-approved third party verifiers. The assessment includes the additionality assessment in line with GCC rules and regulations.

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| Is additionality and baseline-setting... (Paragraph 3.1) | |
| a) assessed by an accredited and independent third-party verification entity? | <input checked="" type="checkbox"/> YES |
| b) reviewed by the programme? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Review of Independent Verifiers

An independent GCC-approved verifier assesses the additionality and baseline of the project in accordance with GCC Project Standard (available at <http://globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Standard-v3.1.pdf>) and applicable baseline and monitoring methodology.

GCC adopts the micro-scale and small-scale positive lists of CDM for automatic additionality. For project specific demonstration and evaluation of additionality, the tool/standards/guidelines of CDM listed below are adopted as referred in “*Standard for Development of Methodologies*” (at <https://www.globalcarboncouncil.com/standards/baseline-monitoring-methodologies/>).

- Methodological tool: Demonstration of additionality of small-scale project activities
- Tool for the demonstration and assessment of additionality

- Combined tool to identify the baseline scenario and demonstrate additionality
 - Tool for demonstration of additionality of small-scale project activities
 - Tool for additionality of first-of-its-kind project activities
 - Tool for common practice
 - Tool for investment analysis
- GCC Program requires [approved GCC Verifiers](#) to conduct third-party independent verifications (*refer paragraph 62 of [Verification Standard](#)*) of GCC Project Activities as per the requirements in the Project Standard, including the requirements for demonstration of additionality.
 - Verification Standard (*refer to paragraph 17*) requires GCC Verifiers to use the latest versions of the Project Verification Report template (PVR) [template](#) to report and certify the demonstration of additionality by the proposed project activity prior to project registration stage (*refer section D.3.5 of PVR and section D.3.5 page 20 of the instructions therein*).

Review by GCC Operations Team

GCC Operations Team (GCC Secretariat)

The Operations Team is required to provide substantial and organizational support to the GCC Advisory Board and GCC Steering Committee so as to strategize and implement the GCC Program, ensure its continuous operations and to facilitate its decision making as per the “GCC Program Manual”.

The functions of Operations Team includes the following:

- (a) Regulatory coordination;
- (b) Standards development;
- (c) Accreditation of verifiers;
- (d) Verifier assessment;
- (e) **Project and ACC issuance request assessment;**
- (f) GCC registry functions;
- (g) Stakeholder management;
- (h) Information technology support; and
- (i) Legal, finance and human resources

The team members of GCC Operations team has several years of experience in CDM methodologies and standardized baselines evaluation/development, project assessment, carbon credits issuance, DOE accreditation, and organization stakeholder development with UNFCCC CDM team, as well as project development, and validation and verification as consultant and DoE. Members of GCC Operations Team are the active members of CDM Methodologies Panel, CDM RIT team and CDM Entity Assessment team.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

There is no change in the Verifier review process as compared to original application.

While submitting original application and responses in 2020, GCC Program did not have many projects received therefore we could not provide the evidence how the GCC Operations Team reviews/evaluates the projects at various stages of completeness checks, request for registration and request for issuance. As on date GCC has received 194 GHG reduction projects from various countries, two projects are registered, and one issuance is completed. We have provided the information on the complete cycle of assessment for sample projects. This evidence is included in “Part 5: Programme Comments” of this form. The links to project verification and emission reduction verification reports is also provided to reflect the work done by GCC-approved third party verifiers. The assessment includes the additionality and baseline-setting assessment in line with GCC rules and regulations.

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. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

GCC adopts the requirements and processes of demonstration and assessment of additionality from CDM.

Additionality is either based on positive list or project-specific approach covered in methodology in line with CDM guidelines.

Project-specific demonstration of additionality

Project-specific demonstration of additionality following CDM tools ensures that:

- a. Project has barrier for implementation; or
- b. Project is not most attractive among available realistic and credible alternatives; and
- c. Project is not a common practice (credibility check); and
- d. The support received from sell of carbon credits issued by GCC Program will help alleviate

the barriers or financial constraints faced by project.

- (i) The project activity is **additional due to project specific circumstances**. Example of project specific circumstances are following.
- a) The project activity is not the most economically attractive among its real and credible alternatives, and/or does not meet the expected rate of return, and that the carbon finance available through GCC Program will help to raise the economic attractiveness of project activity to acceptable level.
 - b) The project activity faces barriers that its real and credible alternatives do not face, and then the business will be alienated due to carbon finance available through GCC Program.

All the CDM tools mentioned in response to previous questions will be referred in methodologies for demonstration and assessment of additionality of projects.

No performance benchmarks have been defined yet, but the plan to develop regional positive list is based on idea of performance benchmark, as mentioned below. This is in line with Standardized Baselines Framework ([Standard for establishment of sector-specific standardized baselines](#)) of CDM. This is explained as under.

- a) **Regional Positive List:** GCC will develop **region-specific positive** list for some of the high potential GHG reduction project activities and reassess and update the positive lists every three years. The development of such positive list is under way. However, an updated list will not have any impact on an already registered project under GCC program or on financial support to their future emission reductions. The technology or fuel or feedstock in GCC's regional positive list will be based on following criteria:

Criterion-1: Performance and cost

- It has a performance (in terms of energy intensity (kWh/unit of product) or carbon intensity (ton CO₂/unit of product)) better than other technologies/fuels/feedstocks contributing to 80% of the output of the sector; and
- It is less economically attractive than atleast 30% of the alternatives, considering all revenue streams except sale of carbon credits or it has no revenues other than carbon revenues.

Criterion-2: Penetration and cost

- It has a low penetration rate as compared to the peer group in the country or the region (Max. 5%).
- It is less economically attractive than atleast 30% of the alternatives in the peer group, considering all revenue streams except sale of carbon credits or it has no revenues other than carbon revenues.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

In line with TAB’s condition for GCC approval the regional positive list (name of countries) is deleted from baseline and monitoring methodology [GCCM001](#).

All the projects submitted so far have used project-based approach for demonstration of additionality.

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*)

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The response to this question in in the response to the following question of alternative procedures of additionality through “positive lists”.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

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| 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? (<i>Paragraph 3.1</i>) | <input checked="" type="checkbox"/> YES |
|---|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Positive list approach for demonstration of additionality

GCC has reasonable assurance that if project implements technology/fuel/feedstock covered in positive lists or demonstrates project-specific additionality based on CDM-approved approach, the mitigation caused by project would not have happened in baseline scenario. Following are the reasons for this assurance.

Positive lists include those technologies which have either (i) highest performance (top 20%) among the peer group or cohort and are not the most cost attractive; or (ii) either low penetration (less than 5%) among the peer group or cohort and are not the most cost attractive. Therefore, these technologies will not likely be implemented and the support received from sell of carbon credits issued by GCC Program will help in their implementation.

For qualifying the additionality test under GCC the project must not be a common practice and shall demonstrate at least one of the following, in accordance with the provisions of applicable baseline and monitoring methodology.

(ii) The project activity applies the technology, fuel or feedstock listed **under positive list**. The

positive list identifies a broad set of abatement activities that are deemed additional.

- b) **Global positive list:** GCC adopts the **CDM's global positive list** of technologies for small-scale and micro-scale project activities.
- c) **Regional Positive List:** GCC will develop **region-specific positive list** for some of the high potential GHG reduction project activities and reassess and update the positive lists every three years. The development of such positive list is under way. However, an updated list will not have any impact on an already registered project under GCC program or on financial support to their future emission reductions. The technology or fuel or feedstock in GCC's regional positive list will be based on following criteria:

Criterion-1: Performance and cost

- It has a performance (in terms of energy intensity (kWh/unit of product) or carbon intensity (ton CO₂/unit of product)) better than other technologies/fuels/feedstocks contributing to 80% of the output of the sector; and
- It is less economically attractive than atleast 30% of the alternatives, considering all revenue streams except sale of carbon credits or it has no revenues other than carbon revenues.

Criterion-2: Penetration and cost

- It has a low penetration rate as compared to the peer group in the country or the region (Max. 5%).
- It is less economically attractive than atleast 30% of the alternatives in the peer group, considering all revenue streams except sale of carbon credits or it has no revenues other than carbon revenues.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the Council's initial approval of programme eligibility (*if none, "N/A"*):

N/A

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*)

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

GCC adopts the requirements and processes of demonstration and assessment of additionality from CDM.

As stated above, additionality is either based on positive list or project-specific approach covered in methodology in line with CDM guidelines.

GCC has reasonable assurance that if project implements technology/fuel/feedstock covered in positive lists or demonstrates project-specific additionality based on CDM-approved approach, the mitigation caused by project would not have happened in baseline scenario. Following are the reasons for this assurance.

1. Positive lists include those technologies which have either (i) highest performance (top 20%)

among the peer group or cohort and are not the most cost attractive; or (ii) either low penetration (less than 5%) among the peer group or cohort and are not the most cost attractive. Therefore, these technologies will not likely be implemented and the support received from sell of carbon credits issued by GCC Program will help in their implementation.

2. Project-specific demonstration of additionality following CDM tools ensures that:
 - a. Project has barrier for implementation; or
 - b. Project is not most attractive among available realistic and credible alternatives; and
 - c. Project is not a common practice (credibility check); and
 - d. The support received from sell of carbon credits issued by GCC Program will help alleviate the barriers or financial constraints faced by project.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

GCC program understand the critical role of additionality in environmental integrity of emission units. The additionality rules remain the same as per original application, however, now experience of evaluation of projects reasonably assures that the traditional project-specific approaches are effective. The evidences produced on sample projects evaluation provide the rigor that is adopted by verifies and GCC Operation Team.

In addition, GCC Program has clarified specific contexts of additionality for bundled projects in [Clarification-1](#) (Refer section 4 of the document), which will be consolidated in GCC documentation in coming months. The additionality determination is necessary of each bundle or for project as a whole for overall additionality demonstration.

Question 4.2 Are based on a realistic and credible baseline

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|---|---|
| Are procedures in place to... (<i>Paragraph 3.2</i>) | |
| a) issue emissions units against realistic, defensible, and conservative baseline estimations of emissions? | <input checked="" type="checkbox"/> YES |
| b) publicly disclose baselines and underlying assumptions? | <input checked="" type="checkbox"/> 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:

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Baseline Scenario

The baseline scenario is the scenario for the GCC project activity that reasonably represents the

anthropogenic emissions that would occur in the absence of the GCC project activity.

CDM's guidance in Combined tool to identify the baseline scenario and demonstrate additionality (<https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-02-v7.0.pdf>) is followed to identify most plausible baseline scenario.

Baseline Approach

Corresponding to the baseline scenario, the baseline of a GCC project activity shall be defined based on one of the three baseline approaches as stipulated by paragraph 48(a), 48(b) or 48(c) of Modalities and procedures for a clean development mechanism (Decision 3/CMP.1). The three approaches are:

- (a) Existing actual or historical emissions, as applicable [48(a)]; or
- (b) Emissions from a technology that represents an economically attractive course of action, taking into account barriers to investment [48(b)]; or
- (c) The average emissions of similar project activities undertaken in the previous five years, in similar social, economic, environmental and technological circumstances, and whose performance is among the top 20 per cent of their category [48(c)].

Baseline Emissions

The GCC methodology shall define which of the above three baseline approaches has been applied to define the baseline of the GCC project activity. To avoid the free interpretation and ensure consistency in the determination of baseline scenarios, CDM's "Guidelines for determining baselines for measure(s)" (https://cdm.unfccc.int/Reference/Guidclarif/meth/meth_guid50.pdf) shall be followed by methodologies for non-afforestation & reforestation projects, to determine when and under which scenarios a baseline approach of paragraph 48(a), 48(b) or 48(c) referred above should be used. This guideline was approved by the CDM Executive Board to standardize and streamline approaches of determination of baselines across all CDM methodologies (Refer project 120 of CDM-EB MAP).

| | |
|---|--|
| Emission Units are based on a realistic and credible baseline. | <p>The Issued Verified Carbon Offsets from GCC Projects are based on realistic and credible baselines for the following reasons:</p> <ul style="list-style-type: none">▪ As per Project Standard (<i>refer section 6.4.9</i>), the proposed projects have to apply approved CDM and GCC Methodologies which provide requirements for determination of baselines for the proposed GCC Projects.▪ In developing the baseline scenario, Project Owners are required, by Project Standard (<i>refer section 6.4.9</i>), to justify assumptions, values and procedures so that the most plausible baseline scenario leads to a conservative estimation of GHG emission reductions.▪ The risks of overestimation of emission reductions are addressed at methodology level within both CDM as well as the GCC Program. The <u>Standard for Development of Methodologies</u> and the <u>Program Process</u> (<i>refer section 4</i>) provides requirements for development of GCC Methodologies, including the requirements on baseline. The Standard for Development of Methodologies (<i>refer section 3.4</i>) follows the CDM modalities and procedures |
|---|--|

| | |
|--|--|
| | <p>and its paragraph 48 for the baseline approaches and CDM's Guideline for determining baseline for measure(s) which includes consistent and conservative approaches for baseline scenario and baseline emissions and considers many aspects including:</p> <ol style="list-style-type: none"> 1. baseline for greenfield (most attractive or benchmark) vs. existing retrofit projects (historic), baseline for capacity expansion (benchmark), baseline for grid connected projects (benchmark); 2. rationale for baseline scenario for all possible investment scenarios and provides methods to calculate baseline emissions (e.g. baseline campaign, baseline survey, control group, top 20% for benchmark); 3. several methodological issues such as signal-to-noise ratio, rebound effect, emission apportioning principles, uncertainties of measurements, and sample size appropriateness that require tailored solutions in methodologies. <ul style="list-style-type: none"> ▪ The List of approved GCC Methodologies and approved CDM Methodologies and CDM Tools are publicly available on UNFCCC website. These methodologies ensure that baselines are realistic and credible. |
|--|--|

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

There is one more methodology ([GCCM003](#)) developed and approved by GCC after the original application was submitted to TAB-CORSIA and one methodology ([GCCM001](#)) was revised. Stringent baseline approaches were applied in development/revision of these methodologies in line with CDM modalities and procedures and its paragraph 48 for the baseline approaches and CDM's [Guideline for determining baseline for measure\(s\)](#).

| | |
|--|---|
| <p>Are procedures in place to ensure that <i>methods of developing baselines</i>, including modelling, benchmarking or the use of historical data, use assumptions, methodologies, and values do not over-estimate mitigation from an activity? (<i>Paragraph 3.2.2</i>)</p> | <input checked="" type="checkbox"/> YES |
|--|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

As stated in response to previous questions, “Standard for Development of Methodologies” at [Standard-for-Development-of-Methodologies-v3.1.pdf \(globalcarboncouncil.com\)](#) includes the basis for defining baselines in its methodology. The key basis is CDM’s “Guidelines for determining baselines for measure(s)” (https://cdm.unfccc.int/Reference/Guidclarif/meth/meth_guid50.pdf) which was approved by the CDM Executive Board to standardize and streamline approaches of determination of baselines across all CDM methodologies (Refer project 120 of CDM-EB MAP). This guideline is the fundamental pillar for determination of baselines taking into account paragraph 48 of CDM modalities and procedure(s).

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

| | |
|---|---|
| Are procedures in place for activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration? (<i>Paragraph 3.2.3</i>) | <input checked="" type="checkbox"/> YES |
|---|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Baselines do change as a result of:

1. Due to renewal of crediting period
2. Dynamic baselines changing over time
3. End of lifetime of baseline equipment

GCC Program is designed for projects applying for fixed crediting period of 10 years without possibility of renewing it. This provision is for the reason of conservativeness as at GCC we believe that issuance of 10 years of carbon credits provide the projects with sufficient incentive for implementation, that would not have been implemented in the baseline or business-as-usual scenario. In fact, GCC program is further conservative by requiring that the crediting period is minimum between 10 years and a conservative technical lifetime of the installed technologies or implemented measures under project. (Refer Project Standard at <http://globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Standard-v3.1.pdf>).

GCC allows the use of relevant CDM Standardized Baselines (including Grid Emission Factors) in the projects submitted for GCC registration. GCC also allows the use of CDM methodologies with dynamic baselines e.g. CDM Methodology AM0070 on energy efficient refrigerators. In addition, GCC is also developing the methodology for low-carbon buildings based on dynamic benchmarks of GORD’s GSAS-Operations green certification system for existing buildings.

GCC Program, by virtue of allowing methodologies of CDM accepts their provision that baseline is assigned a value to “zero” at the end of lifetime of baseline equipment, requiring to issue no more carbon credits beyond lifetime. GCC’s methodologies under development also contain this requirement and will refer to CDM tool [Tool to determine the remaining lifetime of equipment](#).

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

There is no change in the above. On implementation front, the GCC methodologies contain the dynamic baseline provision. For example, for renewable project activities GCCM001 has provision of determination of combined margin emission factor, with an “Ex-post” option. In absence of data for

determination of combined margin emission factor, the methodology also allows to choose from new conservative emission factors available on UNFCCC database.

There are several methodologies which are being planned for development in which conservative, but dynamic baselines are being planned. Following are the examples:

1. Methodology for emission reductions due to renewable energy-based desalination plants or saving of desalinated water: The methodology will have unique **water grid emission factor**, with conservative approaches. The ex-post option will allow the dynamic nature of baseline.
2. Methodology for Carbon Capture & Storage that will have unique methods for conservative ex-ante baselines but claim of emission reductions only based on captured and stored CO2 minus any increase of emissions elsewhere due to project.
3. Methodology for destruction of HFC-134a and other HFC refrigerants with GWP that will have baseline caps coming from the phase-out schedule under Kigali Amendment.

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? (<i>Paragraph 3.3</i>) | <input checked="" type="checkbox"/> YES |
| b) validation occurs prior to or in tandem with verification? (<i>Paragraph 3.3.2</i>) | <input checked="" type="checkbox"/> YES |
| c) the results of validation and verification are made publicly available? (<i>Paragraph 3.3.2</i>) | <input checked="" type="checkbox"/> YES |
| d) monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at <i>specified intervals</i> throughout the duration of the crediting period? (<i>Paragraph 3.3</i>) | <input checked="" type="checkbox"/> YES |
| e) mitigation is measured and verified by an accredited and independent third-party verification entity? (<i>Paragraph 3.3</i>) | <input checked="" type="checkbox"/> YES |
| f) <i>ex-post</i> verification of mitigation is required in advance of issuance of emissions units? (<i>Paragraph 3.3</i>) | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The requirements and procedures are in place to ensure that:

- a) Emissions units (ACCs) are based on accurate measurements and valid quantification methods/protocols. The GCC rules require to apply ISO 14064-2 and ISO14064-3 along with the GCC requirements including CDM approved Methodologies (<https://cdm.unfccc.int/methodologies/PAmethodologies/approved>) or GCC approved Methodologies (<https://www.globalcarboncouncil.com/standards/baseline-monitoring-methodologies/>) as required by paragraph 42 of GCC Program Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>).

The CDM or GCC methodologies are based on robust procedures and are required to calculate emission reductions conservatively based on actual measurements ex-post and use the

internationally and nationally accepted protocols on measurement and calibration using standard practices. Based on the Project submission form and the Project Monitoring Report, the GCC Verifier will verify and certify that the GCC project activity, at two stages- prior to registration and issuance, have accurately monitored and verified the parameters. For example, the screen shot below shows that a project (S00001, Alibey WPP) submitted to GCC Program apply an approved methodology, ACM0002 Grid-connected electricity generation from renewable sources, ver. 20.0 (<https://projects.globalcarboncouncil.com/project/6>).

| PROJECT DETAILS | |
|---|---|
| Project Submission No. | S00001 |
| Project Title | Alibey WPP |
| Project Owner (as per PSF) | 1. Alibey Rüzgar Enerji Üretim Anonim Şirketi 2. GTE KARBON SÜRDÜRÜLEBİLİR ENERJİ EĞİTİM DANIŞMANLIK VE TİCARET A.Ş. (focal point to act on behalf of all Project Owners) |
| Focal Point of Project Owners* | GTE KARBON SÜRDÜRÜLEBİLİR ENERJİ EĞİTİM DAN VE TIC A.Ş |
| Email of Contact Person of PO (Primary) | kemal.demirkol@gte.com.tr |
| Email of Contact Person of PO (Secondary) | k.kaltundis@bursatemizenerji.com.tr |
| Country | Turkey |
| Submission Date | 20 Aug 2020 |
| Global Stakeholder Consultation Period | 20 Sep 2020 - 4 Oct 2020 |
| Sector | 1.Energy industries (renewable-/non-renewable sources) |
| GCC/CDM Methodology & Version | ACM0002 Grid-connected electricity generation from renewable sources, ver 20.0 |
| Forecasted GHG Emission Reduction(TCO ₂ /Year) | 57,952 |
| Verified GHG Emission Reduction(TCO ₂ /Year) | 57952 |
| Forecasted E+ Label | Yes |
| Verified E+ Label | Yes |

| | |
|---|---|
| Forecasted 5* Label | Yes |
| Verified 5* Label | Yes |
| Forecasted SDO* Goals | 7, 8, 9, 11 |
| Verified SDO* Goals | 7,8,9,11 |
| Forecasted SDO* Label | Platinum |
| Verified SDO* Label | Platinum |
| Forecasted Market Eligibility | CORSIA(C+) |
| Verified Market Eligibility | CORSIA(C+) |
| Name of Authorized External Representative Organization | N/A |
| Name of Focal Point of External Representative | N/A |
| Email-id of Focal Point | N/A |
| Documents for Global Stakeholder Consultation | Project Submission, Calculation Sheet, |
| Request For Registration Documents | Verified Project Submission, Verified Calculation Sheet, Other Verified Documents |
| Request for Registration Form | Registration Form |
| Project Verifier | Earthood Services Private Limited |
| Verification Report | Verification Report |

Global Carbon Council - Project Details

Alibey WPP(Id: 104000000027420)

Account Holder

GTE KARBON SÜRDÜRÜLEBİLİR ENERJİ EĞİTİM DANIŞMANLIK VE TİCARET A.Ş

Description

The Project Verification Report (PVR) confirms that the project activity is a 30 MW (4x3 MW + 5x3.6 MW) wind farm project located at nine locations in Burhaniye, Ivrindi and Bergama districts of Balıkesir and Izmir provinces in Turkey. The electricity generated will be exported to the Turkish National Grid via a transmission line of 154kV Bergama – Edremit (BRS N) substation which is located 1 km from the project site. The Project applies CDM Methodology, ACM0002 Version 20. The Project Verification Report (PVR) certifies that the project: (a) Is likely to achieve estimated average annual emission reductions of 57,952 tCO₂e; (b) Is not likely to cause any net-harm to the Environment and Society and therefore is likely to achieve Environmental No-harm Certification Label (E+) and Social No-harm Certification Label (S+); (c) Is likely to contribute to the 5 SDGs (Goal No. 7, 8, 9, 11 and 13) to achieve PLATINUM SDG Label; and (d) qualifies for CORSIA Label (C+).

Project Documents

- GCC Verifier's Project Verification Report (PVR)
- Monitoring Report
- Other relevant verified documents
- Verified Emission reduction calculation spread sheets
- Verified Project Submission Form (PSF)

Issuance Documents

- GCC Verifier's Emission Reduction Verification Report (ERVR)
(01 Oct 2018-31 Dec 2020)
- Verified Emission reduction calculation spread sheets
(01 Oct 2018-31 Dec 2020)



- b) As per the Registration and Issuance process mentioned in figure 6 of the “GCC Program Framework”, V2.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Framework-v2.1.pdf>) and paragraphs 8, 9, 21, 37 of the “Verification Standard”, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Verification-Standard-v3.1.pdf>), validation (called as GCC Project verification) is conducted by the GCC Verifier prior to registration and verification (called as GCC Emission Reduction verification).
- c) GCC Program Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>) makes reference to paragraph 37, 75 (e), which requires that Project documentation and Verification Reports submitted to the GCC Program is available publicly. The GCC Project verification report (Validation report) and GCC Emission Reduction verification report is made publicly available on GCC projects website and the third-party registry (IHS Markit) website. For example, the screen shot below shows that for a project (S00001, Alibey WPP) submitted to GCC Program, the Project validation report is publicly available (<https://projects.globalcarboncouncil.com/project/6>) and Emission Reduction Verification Report is also publicly available (<https://products.markit.com/br-reg/public/public-view/#/project-detail/104000000027420>).
- d) Project Standard, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Standard-v3.1.pdf>) makes reference to paragraph 58 which requires that monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at specified intervals throughout the duration of the 10 year crediting period.
- e) As per the Registration and Issuance process mentioned in figure 6 of the “GCC Program Framework”, V2.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Framework-v2.1.pdf>) and paragraphs 7, 39(c) of the “Verification Standard”, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Verification-Standard-v3.1.pdf>), the mitigation is measured by the project owners using calibrated measuring equipment as stipulated in the registered Project submission form and applicable methodology and verified by an accredited and independent third-party verification entity called as Emission Reduction Verifiers.
- f) As per the paragraphs 37, 40, 39(c) of the “Verification Standard”, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Verification-Standard-v3.1.pdf>), the ex-post verification of mitigation, by Emission Reduction Verifiers, is required in advance of issuance of emissions units (called as ACCs, equivalent to one tonne of carbon dioxide equivalent reduced by the project activity). The issuance of emissions units (ACCs) is based on a third-party verification report by an approved GCC verifier which is a pre-requirement.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none*, “N/A”):

N/A

| | |
|---|---|
| Are provisions in place... (<i>Paragraph 3.3.3</i>) | |
| 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? | <input checked="" type="checkbox"/> 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? | <input checked="" type="checkbox"/> YES |
| c) to address and isolate such conflicts, should they arise? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The “*Procedure for Approval of GCC Verifiers*”, V2.2, dated 12/04/2021 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/procedure-for-approval-of-gcc-verifiers-v2.2.pdf>), makes reference to requirements, which stipulates that the third party verifiers are required to:

- a) shall act impartially and avoid any conflict of interest that may compromise its ability to make impartial decisions (refer Table 1, top row on page 16);
- b) be accredited under CDM by UNFCCC/CDM Executive Board or National Accreditation Bodies (established as per ISO 14065). The accreditation requirements of UNFCCC/CDM Executive Board and National Accreditation Bodies have requirements for third party verifiers on managing and preventing conflict of interest, disclosure of any conflict of interest and provision for addressing and isolating such conflicts, which the third party verifiers are required to comply with and demonstrate during initial accreditation, witnessing, surveillance, renewal of accreditation, performance assessment and other assessments conducted under the CDM and by National Accreditation Bodies. GCC Program will apply the accreditation status of the third-party Verifiers as maintained publicly by the UNFCCC/CDM Executive Board and ISO 14065 National Accreditation Bodies;
- c) ensure prevention and management of conflict of interest which can be assessed by GCC Program as per the provisions of spot-checks. The GCC verifiers may not be re-approved in case, they don’t comply with these provisions or significant breaches are identified (refer to paragraph 41);
- d) submit a signed and stamped “GCC Verifiers Agreement”, V2.1, dated 31/12/2020 (template available on: <http://www.globalcarboncouncil.com/resource-centre/>) prior to approval by GCC Program, which in section 4 contains requirements to identify, to manage and/or prevent conflicts of interest between GCC Verifiers and GCC Program.

In addition, GCC Program Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>) makes reference to paragraph 71 (b), which stipulates that GCC-approved Project Verifiers and Emission Reduction Verifiers will be required to assess and transparently declare any conflict of interest they may have in the Project Activities that they evaluate. A GCC Verifier shall not conduct both the Project Verification and Emission Reduction Verifications for the same Project Activity. If any conflict of interest is identified, the GCC Verifier (organization or person) cannot be deployed to perform the Verification.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

| | |
|--|---|
| Are procedures in place requiring that... (<i>Paragraph 3.3.4</i>) | |
| 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? | <input checked="" type="checkbox"/> 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? | <input checked="" type="checkbox"/> 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:

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The requirements on crediting period is contained in paragraph 51 of the GCC Projects Manual, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/GCC-Program-Manual-v3.1.pdf>) and paragraph 39 of Project Standard, V3.1 dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Project-Standard-v3.1.pdf>), which stipulates a fixed crediting period of 10 years and does not allow its renewal. Therefore, these procedures are not required for GCC projects.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

| | |
|--|---|
| Are procedures in place to transparently identify units that are issued <i>ex ante</i> and thus ineligible for use in the CORSIA? (<i>Paragraph 3.3.5</i>) | <input checked="" type="checkbox"/> YES |
|--|---|

Provide evidence of the policies and procedures referred to above:

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

As per the paragraphs 37, 40, 39(c) of the “Verification Standard”, V3.1, dated 31/12/2020 (<https://www.globalcarboncouncil.com/wp-content/uploads/2021/10/Verification-Standard-v3.1.pdf>), the ex-post verification of mitigation, by Emission Reduction Verifiers, is required in advance of issuance of emissions units (called as ACCs, equivalent to one tonne of carbon dioxide equivalent reduced by the project activity). The issuance of actual achieved emissions units (ACCs) is based on a third-party ex-post verification report by an approved GCC verifier which is a pre-requirement. GCC Program does not allow any units (called as ACCs, equivalent to one tonne of carbon dioxide equivalent reduced by the

project activity) to be issued ex-ante and therefore there is no risk for use of ACCs in the CORSIA.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
N/A

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:

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:
Like any GHG Program, Afforestation & Reforestation project activity types have a risk of reversal of emission reductions, at the end of lifetime of trees, due to forest fires or harvesting of trees.

The project activities of Carbon Capture and Storage (CCS) have risks of reversal if for some reasons the CO₂ sequestered in the geological formation comes out before or after the project crediting period.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
N/A

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

| | |
|---|--|
| <p>Emission Units represent permanent emissions reductions</p> | <p>The Issued Verified Carbon Offsets from GCC Projects will represent permanent emissions reductions due to the following reasons:</p> <ul style="list-style-type: none"> ▪ For projects intending to supply CORSIA-eligible carbon credits, GCC Program covers all GHG sectoral scopes of CDM and & IAF MD 14 (ISO-14064-2) except the GHG sectoral scope 14 (Afforestation and Reforestation (A&R)) and 16 (Carbon Capture and Storage (CCS)) which may have risks due to permanence and accounting reversals; and ▪ GCC Program will not accept projects that intends to supply CORSIA-eligible offsets which fall within GHG sectoral scope 14 (Afforestation and |
|---|--|

| | |
|--|--|
| | Reforestation) and 16 (Carbon Capture and Storage) (refer section 5, footnotes 7 and 8 of GCC Program Framework). |
|--|--|

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (if none, “N/A”):

GCC Program is developing the regulatory framework on CCS, A&R activities and other nature-based solutions (e.g. improved forest management, smart agriculture, soli carbon enhancement).

Framework on A&R and other nature-based solutions will refer to the non-permanence risk tool (NPRT) based on risk-based buffer account for issuance. This tool is being developed by GCC with the help of a renowned consulting firm. CDM A&R methodologies and tools shall be used by project owners to submit projects to GCC. These projects will not be issued temporary, but permanent ACCs taking into account the result of application of NPRT.

Similarly, CCS methodology is being developed along with the solution to non-permanence risk of emission reduction for such projects. This work is being done by GCC with the help of another renowned consulting firm.

It is likely that this work will be concluded by July 2022. We will submit the request for material change following TAB-CORSIA procedure.

| | |
|---|---|
| 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, <i>inter alia</i> , any potential causes, relative scale, and relative likelihood of reversals? (Paragraph 3.5.2) | <input checked="" type="checkbox"/> YES |
| b) monitor identified risks of reversals? (Paragraph 3.5.3) | <input checked="" type="checkbox"/> YES |
| c) mitigate identified risks of reversals? (Paragraph 3.5.3) | <input checked="" type="checkbox"/> 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) | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

For Afforestation & Reforestation project types, GCC follows the applicable CDM rules, guidelines methodologies and standardized baselines for these project types and have plans to develop region-specific methodologies for afforestation & reforestation project activities, based on demand received. However, GCC maintains the maximum crediting period of 10 years for these activities unlike long crediting periods of CDM. The issue of reversal of emission reductions is taken care of by the following provisions:

1. By keeping length of crediting period low (i.e. 10 years), irrespective of actual or potential carbon sequestration by trees for many more years till end of their life.
2. Defining policies of conservative emission removal calculations as well as conservative issuance of ACCs. GCC does not issue 10% of credits every year that project has claimed. The non-issued credits compensate for the emissions that may be caused by the end of lifetime or harvesting of the trees.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

As stated above, the work of NPRT and regulatory framework for A&R and other nature-based solutions in progress. A Senior Advisor on A&R and Nature-based Solution has joined GCC Program who has undertaken this work along with GCC Team and in consultation with Steering Committee. All the issues of reversals will be addressed in the regulatory framework that will be ready by July 2022.

Similarly, as mentioned previously, CCS regulatory framework, methodology and solution to non-permanence risk is being developed and all the concerns related to reversals will be taken care of.

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

GCC will develop policy documents and guidelines on how to address how procedurally the liability towards any such reversal events (especially due to emergency events of forest fires) should be addressed, considering the pertinent points identified in above questions.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

As stated above, for CCS, A&R and other nature-based solutions where risk of reversals exists, the new regulatory frameworks will also define the specific liabilities and responsibilities on part of activity proponents with detailed procedures on how programme should compensate for such reversals.

| | |
|--|---|
| 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? (<i>Paragraph 3.5.6</i>) | <input checked="" type="checkbox"/> YES |
|--|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Given the region in which GCC Program primarily operates, there is less potential for Afforestation & Reforestation projects. GCC Program will develop this capability in future based on demand received from project owners.

Same will be developed for CCS projects when GCC Program will develop rules and methodology for these project types.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

As stated above, the new regulatory frameworks will also define the specific procedures on how programme should compensate for such reversals especially for CORSIA-eligible units.

| | |
|--|---|
| Would the programme be willing and able, upon request, to demonstrate that its permanence provisions can fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA? (<i>Paragraph 3.5.7</i>) | <input checked="" type="checkbox"/> YES |
|--|---|

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:

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

There are several project activities types that may have potential positive leakage emissions. Some of these include the following:

- Fuel switch where cleaner fuel may have higher upstream emissions as compared to baseline fuels.
- Replacement of refrigerator and/or refrigerant, where baseline refrigerant such as HFC gas may leak outside the project boundary
- Replacement of incandescent bulbs with LEDs where replaced bulbs are used elsewhere in project boundary
- Avoided cars due to mass transport may be used elsewhere outside the project boundary.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
N/A

| | |
|--|---|
| 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? (<i>Paragraph 3.6</i>) | <input checked="" type="checkbox"/> YES |
|--|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Positive leakage emissions are addressed in methodologies across all CDM methodologies. GCC methodologies also appropriately address these measures. Negative leakage emissions are considered zero for the reasons of conservativeness. GCC methodologies will refer to following CDM tools that estimate leakage emissions for various project activity types.

- Baseline, project and/or leakage emissions from electricity consumption and monitoring of electricity generation
- Project and leakage emissions from biomass
- Project and leakage emissions from composting
- Upstream leakage emissions associated with fossil fuel use
- Project and leakage emissions from anaerobic digesters
- Calculation of baseline, project and leakage emissions from the use of refrigerants

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
N/A

| | |
|---|---|
| Are provisions in place requiring activities that pose a risk of leakage when implemented at the project level to be implemented at a national level, or on an interim basis on a subnational level, in order to mitigate the risk of leakage? (<i>Paragraph 3.6.2</i>) | <input checked="" type="checkbox"/> YES |
|---|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

The propagation of risk of leakage emissions from project level to nation/sub-national can happen from a project activity of distributed nature (e.g. mass replacement of incandescent bulbs with LED lights). If such activities are submitted to GCC Program, use of CDM tools and guidelines address such leakage emissions. For example, [Guidelines for sampling and surveys for CDM project activities and programme of activities](#) address the appropriate procedures for sampling to be conducted at national/sub-national level.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A”

that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
N/A

| | |
|--|---|
| Are procedures in place requiring and supporting activities to monitor identified leakage? (<i>Paragraph 3.6.3</i>) | <input checked="" type="checkbox"/> YES |
|--|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Existing CDM and GCC methodologies and above referred CDM tools have the monitoring requirements in place to monitor identified leakage. The GCC methodologies duly incorporate leakage monitoring provisions.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

| | |
|---|---|
| Are procedures in place requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities? (<i>Paragraph 3.6.4</i>) | <input checked="" type="checkbox"/> YES |
|---|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Existing CDM and GCC methodologies and above referred CDM tools have the provisions in place that deduct the leakage emissions from baseline emissions to make lower amount of emission reductions available to projects. The GCC methodologies duly incorporate this feature.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

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 (<i>Paragraphs 3.7.1 and 3.7.5</i>) | <input checked="" type="checkbox"/> YES |
| b) to ensure that one unit is issued or transferred to, or owned or cancelled by, only one entity at any given time? (<i>Paragraphs 3.7.2 and 3.7.6</i>) | <input checked="" type="checkbox"/> YES |
| c) to discourage and prohibit the double-selling of units, which occurs when one or more entities sell the same unit more than once? (<i>Paragraph 3.7.7</i>) | <input checked="" type="checkbox"/> YES |
| d) to require and demonstrate that host countries of emissions reduction activities agree to | <input checked="" type="checkbox"/> YES |

| | |
|---|--|
| 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):

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Double Issuance by GCC Program

IT workflow system of GCC and IHS MarkIt does not allow double issuance, as before issuance both the parties check that no issuance has been made for the same monitoring period.

The issuance of ACCs will be made to the project owner account (or ACCs aggregator account) on GCC carbon registry only once by IHS MarkIt, team based on GCC Operation Team’s instructions.

Double Issuance by other GHG programs

There is a risk that in case same project activity is registered with GHG programs other than GCC, GCC Operations team checks the GPS coordinates (provided in project document) of the project and whether it is registered by other programs. In such case, before issuance of ACCs, GCC team will check with other programs that they are not issuing the carbon credits for the same monitoring period.

Double Use and Double Sell

The credits will be either retired from ACC aggregator’s account or transferred to project supporter’s account by IHS MarkIt team based on GCC Operation Team’s instructions. GCC will provide the instructions on retirement of credits when voluntary purpose for which the ACCs are bought by Project Supporter is over (e.g. carbon neutrality of an event). Similarly, GCC will provide the instructions for transfer of ACCs to Project Supporter’s account when the Project Supporter is required to show compliance against a mitigation obligation (e.g. CORSIA obligation of an International Airline). Therefore, double use of ACCs and double selling will be completely avoided. In case a retail aggregator of ACCs is involved, some financial institutions may take the role of retail aggregator, which will also maintain the bank accounts in which the money for ACC purchase will be transferred by project supporters. These institutions will maintain clear and transparent record of money transacted against sell of ACCs.

The terms and conditions governing the IHS Markit Registry are available at the following link:
<https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf>.

Additionally, information on IHS Markit’s governance and code of conduct is available here:
<http://investor.ihsmarkit.com/phoenix.zhtml?c=188457&p=irol-govhighlights>

- Paragraph 70 of section 10.2 of GCC Program Manual (Available at <https://www.globalcarboncouncil.com/resources/GCC-Program-Manual-v3.pdf>) provides safeguard against over issuance due to: (i) double issuance by GCC Program; (ii) double issuance by other GHG

program; (iii) Double use and double sell. The safeguards are either in the form of a special features of GCC carbon registry in preventing over issuance, or the processes followed by GCC Program in preventing double issuance or double claim. The section also contains procedures to replace the deficient or double counted offset units (ACRs).

- For projects intending to supply CORSIA-eligible units, GCC Program clearly requires declaration of no-double counting from national authorities, through host country attestation for CORSIA-eligible units. Refer Section A.6 (c) in instructions to fill Project Submission Form available at <https://globalcarboncouncil.com/program-forms-and-templates.html>.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

In addition to above, after submitting the original application to CORSIA, GCC Program has joined IHS Markit Meta Registry and World Bank Climate Warehouse, the platforms to address the risks of double issuance between registries and double use. Please refer to **Part 5** of this document and **Annex 1** below, which provides the details of all changes to the GCC Program, since the last submission to the TAB/CORSIA.

| | |
|---|---|
| Does the Programme have procedures in place for the following: (<i>Paragraph 3.7.8</i>) | |
| 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? | <input checked="" type="checkbox"/> 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)? | <input checked="" type="checkbox"/> YES |
| c) for Host country attestations to be obtained and made publicly available prior to the use of units from the host country in the CORSIA? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

GCC Program is in discussions with various government departments in Qatar that in future when the rules for accounting for the underlying mitigation associated with units used in ICAO are clear from host country, GCC will inform it to ICAO and make the host country decisions available on News webpage of GCC website (<http://gct.qa/en/news>). GCC will update ICAO about such decisions by other host countries as well. However, GCC believes that unless the climate negotiations on article 6 of Paris Agreement are not concluded, it is unlikely that governments will take official position on this aspect. The team members of GCC recently wrote an article about the role of regional carbon markets in implementation of article 6.2 of Paris Agreement. In this article, how CORSIA credits should be treated is also made clear (especially refer table-1 and figure-3 of the document available at http://gct.qa/admin/Content/UserFiles/GCC_Carbon_Market_Article_01.pdf).

Paragraph 77 (d) of article 13 decision text released at COP 24 at Katowice(https://unfccc.int/sites/default/files/resource/cma2018_3_add2_new_advance.pdf#page=18)

requires country to follow certain reporting requirements if ITMOs are used for the purposes other than compliance of NDC. We firmly believe that the sectors not covered under NDCs should be allowed to issue credits for the purposes of CORSIA obligation compliance of international airlines. However, it is the prerogative of the governments how they want to account the emission reductions (domestic or international voluntary credits or ITMOs) sent from NDC-covered sectors to international airlines.

It is the request of GCC Program to ICAO that it should organize the capacity building workshops of CORSIA-signatory countries and respective airlines on how to address the issue of double accounting. GCC would be pleased to take part in such workshops.

We understand that CORSIA wishes to pass on the responsibility of host country attestation to project proponents. Appendix A (para 3.7.8) of CORSIA application form states “The program should obtain, or require activity proponents to obtain and provide to the program, written attestation from the host country’s national focal point or focal point’s designee.²⁵ The attestation should 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). Host country attestations should be obtained and made publicly available prior to the use of units from the host country in the CORSIA.”

GCC Program has provision of host country attestation by project proponent prior to transfer of units to international airline account in its Project Submission Form (<http://gct.qa/en/resource-centre>). In particular, section A.5 of instructions of Project Submission form states:

“Project owner shall obtain and provide to the GCC and its Registry (IHS Markit), a written attestation from the host country’s national focal point or focal point’s designee, as required by *CORSIA Emissions Unit Eligibility Criteria*²⁶ (paragraph 7 (c) of *Carbon Offset Credit Integrity Assessment Criteria*) and ‘*Programme Application Form – Appendix A – Supplementary Information Form*²⁷’ (refer section 3.7.8. with respect to- *Host country attestation to the avoidance of double-claiming*) in which shall be made publicly available prior to the use of units from the host country in the CORSIA.”

As per para 3.7.12 of Appendix A “The program should be prepared to report to ICAO’s relevant bodies, as requested, performance information related to, inter alia, any material instances of and program responses to country-level double-claiming; the nature of, and any changes to, the number, scale, and/or scope of host country attestations; any relevant changes to related program measures.” GCC Program is committed to provide this information to ICAO’s relevant bodies.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

The newly approved “Standard for Avoidance of Double Accounting” available at <https://www.globalcarboncouncil.com/wp-content/uploads/2022/03/Standard-on-Avoidance-of-Double-Counting-V1.pdf> includes the requirement for Host Country Letter of Authorization (HCLOA) for request for registration and request for issuances with the demand for CORSIA labels. The Project Submission

²⁵ Agency responsible for a host country’s national emissions inventory reporting (“National Focal Point”); including under the Paris Agreement.

²⁶ ICAO document ‘CORSIA Emissions Unit Eligibility Criteria’:

<https://www.icao.int/environmental-protection/CORSIA/Documents/ICAO%20document%2009.pdf>

²⁷ <https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx>

Form also refers to the same, although the term used is LOAA, which will be changed to HCLOA in future, in line with COP26 decision on Article 6.2.

As per the Standard referred above:

Project shall provide a 'HCLOA'ⁱ from the designated national authority or designated focal point of the host country of the project activity (where the project is located). The template for HCLOA is provided in Annexure 1 and 2 of Appendix. At minimum, HCLOA shall:

- (a) Include the GCC project unique identification details – Submission number (SXXX), IHS Markit Project Id (if available), Name of the host country (where the project is located), and Title of the Project Activity;
- (b) Include the weblink of GCC Project website and GCC public Registry (on IHS Markit public registry) where the project is publicly available;
- (c) Shall authorise the Project Owner(s), with the contact details and the authorised representative, as per the Annex 1 of the Project Submission Form (PSF);
- (d) Acknowledge that the project activity is likely to reduce emissions in the host country;
- (e) Acknowledge that the GCC Program to which the letter is provided has issued, or intends to issue, offset credits for the emission reductions that occur within the country;
- (f) Authorize the use of the emission reductions, issued as offset credits to project, by user in order to meet offsetting requirements of either CORSIA or article 6.2 or voluntary buyers requiring the corresponding adjustments to be applied by host country;
- (g) Declare that the host country will not use the project's emission reductions to track progress towards, or for demonstrating achievement of its NDC and will account for their use for either international mitigation purposes or other purposes, by applying corresponding adjustments in section B of Annex 1 of COP26 decision -/CMA.3 on Article 6.2.
- (h) Signature and contact details of authorised signatory of designated national authority or designated focal point of the host country.

Paragraph 33(d) of Program Processes document requires Project Owners to submit the **HCLOA** together with the project documentation required for submission of request for registrationⁱⁱ of the project with the GCC Program to allow GCC Project Verifier to conduct verificationⁱⁱⁱ before the GCC project activity can be displayed as having market eligibility flag (C+ or CA⁺)' on the GCC Project website^{iv} and GCC registry.

Notwithstanding to the document submission requirement mentioned in paragraph **above**, if the above documents cannot be submitted by the Project Owner as part of request for registration, then, HCLOA for the project activity shall be submitted to GCC Program together with the project documentation required for submission of request for issuance. If Project Owner cannot provide necessary HCLOA at project registration stage however makes a declaration in Project Submission Form that such letter shall be submitted at the stage of request for issuance. GCC Program can issue market eligibility flag at the request for registration stage based on declaration of Project Owner, however such market flag merely represent the Project Owner's intentions. For issuance of any of these market eligibility flags at the ACC issuance stage, the HCLOA must be submitted by Project Owner at the time of submission of request for issuance. If the host country grants HCLOA for entire crediting period of project and commits to apply

corresponding adjustments throughout, there is no need for issuance specific HCLOA. However, country may choose to issue the issuance specific HCLOA.

Since the host country attestations are the part of request for registration or issuance, they will be available either on GCC Project Portal or GCC Registry on IHS Markit website.

As per COP26 decision on Article 6.2 CORSIA compliance falls under “Other International Mitigation Purposes” and **it is the host country’s responsibility to ensure that no double claiming is done under NDCs** for the emission reductions from the GCC registered projects for which the host country has provided the HCLOA to GCC. If the HCLOA is issued at the stage of specific issuance, the host country must ensure that no emission reductions from the corresponding monitoring period of project are claimed under NDC.

All the reporting requirements (annual and regular) as per section IV (B) and IV(D) of Annex to Article 6.2 decision²⁸ are applicable to the host country.

GCC Program will transparently provide to relevant authorities and registries the information on number of credits issued for different monitoring periods for different projects along with the market eligibility labels (C+, CA+) for which authorization letters are received from host countries. However, GCC Program shall have no liability towards ensuring that host country has not claimed the emission reductions corresponding to issued ACCs under its NDC.

| | |
|--|---|
| Does the Programme have procedures in place requiring... (<i>Paragraph 3.7.9</i>) | |
| a) that activities take approach(es) described in (any or all of) these sub-paragraphs to prevent double-claiming? | <input checked="" type="checkbox"/> YES |
| <input type="checkbox"/> Emissions units are created where mitigation is not also counted toward national target(s) / pledge(s) / mitigation contributions / mitigation commitments. (<i>Paragraph 3.7.9.1</i>) | |
| <input checked="" type="checkbox"/> 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. (<i>Paragraph 3.7.9.2</i>) | |
| <input checked="" type="checkbox"/> Programme procedures provide for the use of method(s) to avoid double-claiming which are not listed above (<i>Paragraph 3.7.9.3</i>) | |
| b) that Host Country attestations confirm the use of approach(es) referred to in the list above? | <input checked="" type="checkbox"/> YES |

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

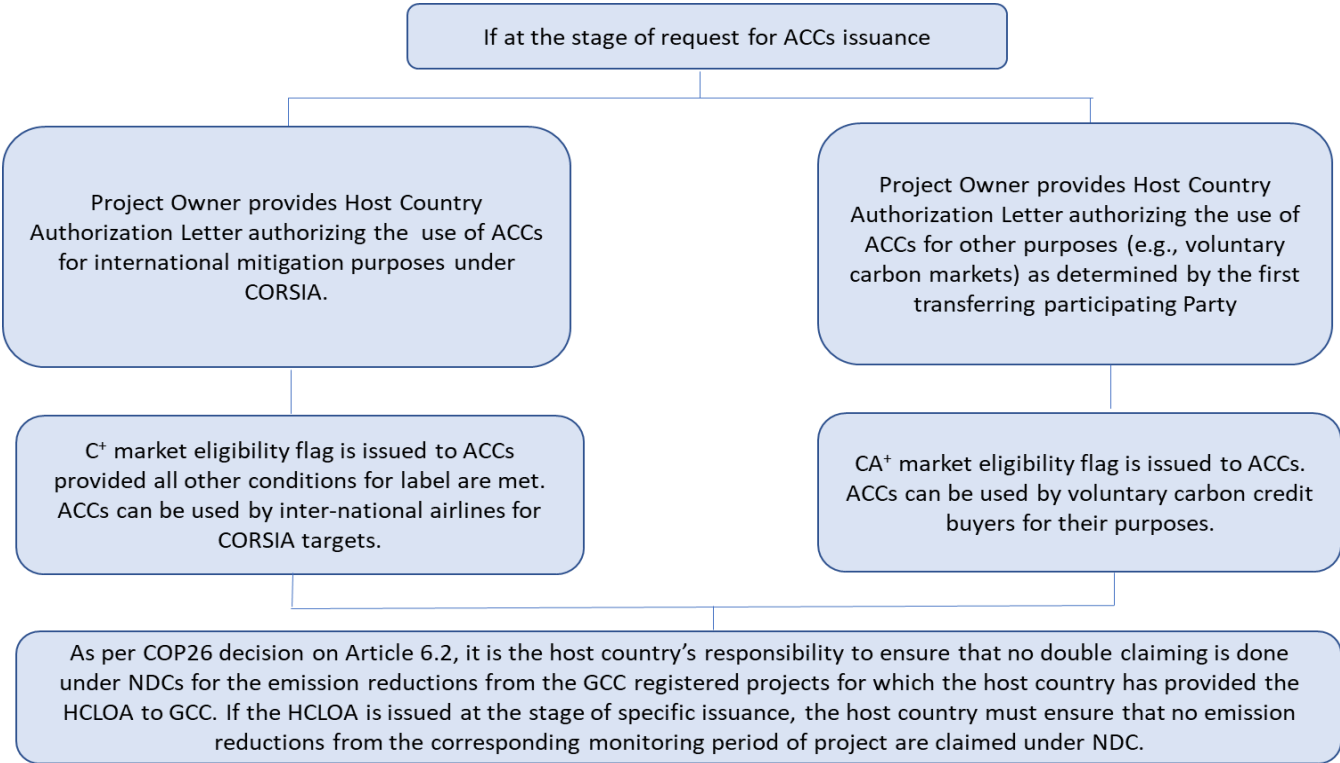
A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Please refer the “Standard for Avoidance of Double Accounting” available at <https://www.globalcarboncouncil.com/wp-content/uploads/2022/03/Standard-on-Avoidance-of-Double->

[Counting-V1.pdf](#) which serves the purpose of implementation of CORSIA guideline on double accounting and the decision on Article 6.2 at UNFCCC COP26.

[GCC Project Submission Form \(PSF\) template](#) (refer section A.6) requires to demonstrate the compliance with the CORSIA requirements of avoidance of double counting on project-to-project basis and requires Project Owners to obtain and provide to the GCC Program and its Registry (IHS Markit), a written host country attestation (or HCLOA) from the host country’s national focal point or focal point’s designee, as required by CORSIA Emissions Unit Criteria (paragraph 7 (c) of Carbon Offset Credit Integrity Assessment Criteria) and ‘Programme Application Form – Appendix A – Supplementary Information Form (refer section 3.7.8. with respect to- Host country attestation to the avoidance of double-claiming). This HCLOA shall be made publicly available prior to the use of units from the host country in the CORSIA. Therefore, the onus lies on the Project Owner to comply with this requirement. The handover of HCLOA by Project Owner to GCC Program for the avoidance of double-claiming is a pre-requisite for use of the emission units for offsetting under CORSIA. Without such HCLOA, GCC Program will not flag the emission units generated from the projects as ‘CORSIA compliant’ in the registry. This will ensure that offsets from GCC Projects are only counted once towards a mitigation obligation

As per “Standard for Avoidance of Double Accounting” Following is the flowchart for the process of Issuance of market eligibility flags for Avoidance of Double Accounting.



Apart from C+ label for CORSIA eligibility, emission units can also claim eligibility for CA+ label, the market eligibility flag denoting that the host country of the project, for which carbon credit is issued, has officially communicated that the issued carbon credit will be included in the corresponding adjustments

towards NDC target. The emission units with CA+ label can be used for “other purposes” as per article 6.2 e.g., by voluntary carbon market buyers preferring the units with letter of authorization and respective corresponding adjustments by host country.

In future, GCC has plan to issue label for ITMOs for the units to be used for compliance of recipient country’s NDC.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
 “Standard for Avoidance of Double Accounting” available at <https://www.globalcarboncouncil.com/wp-content/uploads/2022/03/Standard-on-Avoidance-of-Double-Counting-V1.pdf> .

| | |
|--|---|
| 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? | <input checked="" type="checkbox"/> YES |
| b) update information pertaining to host country attestation as often as necessary to avoid double-claiming? | <input checked="" type="checkbox"/> YES |

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:
 GCC Program is committed to provide the information to ICAO’s relevant bodies as per para 3.7.12 of Appendix A of CORSIA application form “The program should be prepared to report to ICAO’s relevant bodies, as requested, performance information related to, inter alia, any material instances of and program responses to country-level double-claiming; the nature of, and any changes to, the number, scale, and/or scope of host country attestations; any relevant changes to related program measures.”

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):
 After submitting the original application to CORSIA, GCC Program has joined IHS Markit Meta Registry and World Bank Climate Warehouse, the platforms to address the risks of double issuance between registries and double use. Please refer to **Part 5** of this document and **Annex 1** below, which provides the details of all changes to the GCC Program, since the last submission to the TAB/CORSIA.

The information on Climate Warehouse as well as that included in the Biennial Transparency Report as per Article 6.2 decision on Reporting requirements will be publicly available. Countries are expected to maintain and report the “Article 6 Database” to UNFCCC. As the application of corresponding adjustments, recording, tracking and reporting responsibility lies with the host country, the GCC Program does not feel responsible for making host country decisions publicly available. However, GCC Program is committed to make all host country authorizations submitted to GCC publicly available.

| | |
|--|------------------------------|
| Does the Programme have procedures in place to compare countries’ accounting for emissions | <input type="checkbox"/> YES |
|--|------------------------------|

| | |
|--|--|
| units in national emissions reports against the volumes of eligible units issued by the programme and used under the CORSIA which the host country’s national reporting focal point or designee otherwise attested to its intention to not double claim? (<i>Paragraph 3.7.11</i>) | |
|--|--|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

As per Article 6.2 decision countries are expected to maintain and report the “Article 6 Database” to UNFCCC. As the application of corresponding adjustments, recording, tracking and reporting responsibility lies with the host country, the GCC Program does not feel responsible for any action to cross check whether the sovereign host country actually applied the corresponding adjustments. In the Program’s view, if host country does not comply with Article 6.2 requirements, it should be challenged by technical experts at UNFCCC level.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

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

| | |
|--|------------------------------|
| 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? (<i>Paragraph 3.7.13</i>) | <input type="checkbox"/> YES |
|--|------------------------------|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

As per Article 6.2 decision countries are expected to maintain and report the “Article 6 Database” to UNFCCC. As the application of corresponding adjustments, recording, tracking and reporting responsibility lies with the host country, the GCC Program does not feel responsible for any action to reverse of compensate the emission units issued as CORSIA-eligible if the sovereign host country does not follow its commitment to apply the corresponding adjustments as promised in the Authorization Letter to GCC. In the Program’s view, if host country does not comply with Article 6.2 requirements, it should be challenged by technical experts at UNFCCC level. However, if Program receives the information with the evidence that host country has not followed its commitment as per Authorization Letter, we are committed to inform ICAO’s relevant body about it.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

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

| | |
|--|---|
| Would the Programme be willing and able, upon request, to report to ICAO’s relevant bodies, as requested, performance information related to, <i>inter alia</i> , any material instances | <input checked="" type="checkbox"/> YES |
|--|---|

| | |
|---|--|
| 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? (<i>Paragraph 3.7.12</i>) | |
|---|--|

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? (<i>Paragraph 3.8</i>) | <input checked="" type="checkbox"/> YES |
|---|---|

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

GCC has procedures in place that ensures that GCC offset projects do not violate local, state/provincial, national or international regulations or obligations. The primary eligibility criteria for GCC program is that a project shall always comply with applicable legal requirements of the host country. This is evident from the following:

- a) Additionality requirements of the *GCC Project Standard* (available at <https://www.globalcarboncouncil.com/standards/project-standard/>) and the “*Standard on Project requirements and Development of Methodologies*” (<http://globalcarboncouncil.com/wp-content/uploads/2021/10/Standard-for-Development-of-Methodologies-v3.1.pdf>) refer to the CDM Methodological tools (*Tool for the demonstration and assessment of additionality* and *Combined tool to identify the baseline scenario and demonstrate additionality*) which require compliance with legal requirements as primary condition to apply the tool to demonstrate additionality.
- b) Environment and Social Safeguards Standard of GC (available at <http://www.globalcarboncouncil.com/resource-centre/>) require that GCC project activity does not cause any net-harm to Environment and Society. This standard requires to conduct ‘Do-No-Net-Harm’ Risk Assessment to determine impacts that are not complying with the applicable National Legal requirements/ or exceed the legal limits and are categorized as ‘Harmful’. This standard requires to develop actions plans to contain or reduce or eliminate those impacts identified as ‘Harmful’.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

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

A. Information contained in the programme’s original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

GCC Program also ensures that the project construction and operations do not cause any net-harm to environment and society as per host country’s legal requirements.

- a) Environment and Social Safeguards Standard of GCC (available <http://www.globalcarboncouncil.com/resource-centre/>) aims to provide the additional process, carried out together with the GCC Registration and Issuance process, and stipulates requirements for those GCC Projects which, in addition to reducing greenhouse gases (GHG), voluntarily intend to ensure that the project activity does not cause any 'Net-harm' to Environment and the Society by applying *Environmental and Social Safeguards Standard* and provides the possibility to demonstrate this achievement by obtaining additional certification label, called as '*Environmental No-net-harm Label (E+)*'; and *Social No-net-harm Label (S+)*'.
- b) The requirements in this standard is not mandatory for GCC Projects and the project owners may choose to voluntary apply this standard to demonstrate that the project activity does not cause any net-harm to Environment and Society and accordingly shall indicate their choice in the project submission form (PSF), which shall be verified ex-post by approved GCC Verifiers. However, this criterion is mandatory for the projects that intend to sell ACCs for CORSIA obligation compliance.
- c) This standard aims to provide the process, via integration with the GCC Registration and Issuance process:
 - i. For identifying Environmental and Social impacts caused as a result of the construction and operations of the project activity as per the requirements mentioned in the standard;
 - ii. To conduct 'Do-No-Harm' Risk Assessment to determine impacts that are categorized as 'Harmful'. If impacts exist but are not complying with the applicable national legal requirements/ or exceed the legal limits, then it is likely to cause harm and shall be indicated as 'Harmful';
 - iii. To develop actions plans to contain or reduce or eliminate those impacts identified as 'Harmful';
 - iv. For providing a framework of monitoring of the actions plans and its targets;
 - v. The scoring shall be conducted for each impact, to confirm whether the GCC project activity does or does not cause any harm to Environment and Society. Finally calculate 'Net Score', which is obtained after adding all the individual scores to determine whether the project meets net-no-harm criterion.
 - vi. Based on the Project submission form and the Monitoring Report, the GCC Verifier shall certify that the GCC project activity does not cause any net-harm to Environment and Society at two stages- prior to registration and issuance.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in "A" that were initiated following the Council's initial approval of programme eligibility (*if none, "N/A"*):

N/A

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*)

A. Information contained in the programme's original application, including information submitted in response to follow-up discussions and written questions pertaining to this topic:

Please refer to *Environment and Social Safeguards Standard* of GCC (available at <http://www.globalcarboncouncil.com/resource-centre/>) which has been developed based on the analysis of various best practices and experiences on ground and approaches suggested by many publicly

available publications and sources including the approaches applied by ISO 14001, CDM, Gold Standard, VCS (Verra) and legal rules related to applicable Environment and social impacts of the host country.

B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the Council’s initial approval of programme eligibility (*if none, “N/A”*):

N/A

PART 5: Programme comments

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

SUMMARY OF CHANGES IN GCC PROGRAM'S IMPLEMENTATION & OPERATIONS SINCE LAST SUBMISSION TO TAB/CORSIA & FUTURE REGULATORY CHANGES:

GCC Program submitted a number of documents to TAB of CORSIA for approval since October 2019 till 14 December 2021, subsequent to which conditional approval was achieved on 28 April 2020 and full approval was received on 12 March 2021. The last time the submission was made to TAB/CORSIA on 14 December 2021 and since then the GCC Program has made a great progress both in the institutional structure as well as significant results and outcomes due to operation and implementation of GCC Program have been achieved. The document below describes these developments and results/outcomes and highlights the changes since the last submission to TAB/CORSIA.

(A) Improvements in regulatory framework documents:

The list of all the regulatory documents (including standards, procedures, templates and forms, etc) containing requirements of GCC Program are publicly available at) are provided in **Annex 1** below, which provides the web-links and indicate whether there are any changes since the last submission to the TAB/CORSIA. The details of the changes are also provided in the history box provided on the last page of each document.

Two documents- **GCC Program Framework** and **Program Manual** provide a broader overview of the whole GCC Program, its institutional structure, process, governance (Advisory Board, Steering Committee, Verifiers, GCC Operations Team), implementation, operations, documentation structure and rules and requirements, Registry, provisions for stakeholder consultations (both local and global), over-Issuance Safeguards, confidentiality provisions, conflict of interest provisions, Insurance provisions, public Information and transparency policies, allowing use of CDM/GCC methodologies, Tools and guidance, clarifications, Environmental and social safeguards, contribution to UN SDGs, CORSIA requirements, etc. The **Project Standard** provides requirements for the Project Owners to develop the GCC Project throughout the entire project cycle right from the submission of the project till issuance of the ACCs by the GCC program. The **Verification Standard** provides requirements for GCC verifiers which they must follow for conducting GCC Project Verification and Emission Reduction Verification. The **Program Process** provides requirements the entire project cycle right from the submission of the project till issuance of the ACCs by the GCC program, including on the registration and issuance process.

(B) Improvements in GCC Methodology development:

Since the last submission to the TAB/CORSIA, one new GCC methodology (GCCM003) was approved and another existing methodology (GCCM001) was revised. The public calls are launched for receiving inputs (<https://www.globalcarboncouncil.com/standards/baseline-monitoring-methodologies/#1633981295919-60acee06-bcc3>) from the stakeholders prior to approval. All the GCC methodologies are publicly available on the GCC website (<https://www.globalcarboncouncil.com/standards/baseline-monitoring-methodologies/>). The list of all the GCC Methodologies are provided below.

Baseline and Monitoring Methodologies contain specific applicability criteria for their use by GHG reduction projects (depending on the project types), project boundaries, emission reduction algorithm, and monitoring requirements/procedures for applicable project types.

|  | Standard for Development of Methodologies – V3.1 | Older Version: V3.0 2.0 | | |
|---|---|--------------------------------------|------------------|---------------|
| Approved Methodologies | | Methodologies For Public Call | | |
| Methodology No. | Title of Methodology | Active Version No. | Date of Approval | Older Version |
| GCCM001 | Methodology for Renewable Energy Generation Projects Supplying Electricity to Grid or Captive Consumers | V3.0 | 22/02/2022 | V2.0 – V1.0 |
| GCCM002 | Methodology for Energy Saving in Pumping Systems | V1.0 | 30/01/2020 | |
| GCCM003 | Methodology for Energy Generation from Animal Manure and Waste Management Projects | V1.0 | 08/07/2021 | |

(C) Enhancing the regional development and capacity of GCC Verifiers:

Till today, six GCC Verifiers have been approved already and already providing verification services. Since the last submission to the TAB/CORSIA, four new GCC Verifiers have been approved, three more applicant verifiers (from China, Spain, Turkey), already accredited by UNFCCC CDM Executive Board have submitted applications seeking approval and additionally four more Verifiers have expressed interest and expected to submit applications soon. All the GCC approved GCC verifiers are publicly available on the GCC website (<https://www.globalcarboncouncil.com/governance/gcc-verifiers/>) and the list of approved verifiers are provided below.

| Name of GCC Verifier | Verifier Reference No. | Accreditation | Approved on |
|---|------------------------|---|-------------|
| Earthhood Service Private Limited www.espl-global.com | GCCV001 | UNFCCC CDM Executive Board (DOE Number CDM-E-0066) https://cdm.unfccc.int/DOE/list/DOE.html?entityCode=E-0066 | 16/07/2020 |
| EPIC Sustainability Services Private Limited www.epicsustainability.com | GCCV002 | UNFCCC CDM Executive Board (DOE Number CDM-E-0062) https://cdm.unfccc.int/DOE/list/DOE.html?entityCode=E-0062 | 15/10/2020 |

| | | | |
|---|---------|---|------------|
| | | 0062 | |
| KBS Certification Services Private Limited www.kbscertification.com | GCCV003 | UNFCCC CDM Executive Board (DOE Number CDM-E-0051) https://cdm.unfccc.int/DOE/list/DOE.html?entityCode=E-0051 | 03/01/2021 |
| Carbon Check (India) Private Limited (CC IPL) www.carboncheck.co.in | GCCV004 | UNFCCC CDM- Executive Board https://cdm.unfccc.int/DOE/list/DOE.html?entityCode=E-0052 | 12/01/2021 |
| 4K Earth Science Private Limited www.4kearthscience.com | GCCV005 | UNFCCC Executive Board https://cdm.unfccc.int/DOE/list/DOE.html?entityCode=E-0069 | 13/12/2021 |
| Verico SCE www.Verico.eu | GCCV006 | National Accreditation Body of Germany: DAkkS (Deutsche Akkreditierungsstelle) - https://www.Verico.eu/en/Verico/accreditations/din-en-iso-14065 | 12/02/2022 |

One example of demonstration of GCC Procedures and application of GCC requirements is presented using a real case study which shows how an applicant GCC Verifier' application is evaluated and is given below:

- a) **Application:** 4K Earth Science Private Limited (GCCV005): For detailed scopes and approval conditions, refer to GCC Verifier certificate available publicly (https://www.globalcarboncouncil.com/wp-content/uploads/2021/12/GCCV005-00_4KES_GCC-Verifier-Certificate_13122021.pdf). The Evaluation Report for the Verifiers Application: Refer to attached **Annex 2 (confidential document)**

(D) Enhancing the operations by improving the capacity of GCC Operations Team:

Since the last submission to the TAB/CORSIA, nine new staff members of GCC Operations Team have been recruited to support the processing of the Project submissions and provide support to GCC Steering Committee to enable them to make decisions on Project Registrations and Issuances as well as approval of regulatory documents including the methodologies. This reflects the GCC programs commitment to ensure longevity of the program.

(E) Capacity building of the stakeholders:

Since the last submission to the TAB/CORSIA, considerable progress has been achieved in developing the capacity of the stakeholders to enhance the awareness and understanding of the requirements of GCC program with an objective to enhance the quality of project submissions by Project Owners and their verification by the GCC Verifiers. A number of events were organized as detailed below:

| Event | Date | Number of Participants | Reference |
|--|------------|------------------------|---|
| 'Calibration Workshop for GCC Verifiers' | 07/02/2022 | 60 | https://www.globalcarboncouncil.com/global-carbon-council-hosts-calibration-workshop-for-gcc-verifiers/ |
| 'Calibration Workshop for GCC Project Owners/Developers' | 07/03/2022 | 55 | https://www.globalcarboncouncil.com/calibration-workshop-for-gcc-project-owners-developers/ |
| 'Calibration Workshop for GCC Project Owners/Developers' | 08/03/2022 | 50 | https://www.globalcarboncouncil.com/calibration-workshop-for-gcc-project-owners-developers/ |

| | | | |
|-------------------------------------|------------|----|---|
| Global Carbon Council (GCC) Webinar | 09/03/2022 | 40 | https://www.linkedin.com/posts/globalcarboncouncil_global-carbon-council-webinar-march-9-activity-6905785651896156160-uiPq |
|-------------------------------------|------------|----|---|

(F) Increasing number of Project Submissions:

Since the last submission to the TAB/CORSIA, considerable progress has been achieved and about 194 projects have been submitted as of date and the table below provides the current status which is available online on GCC Projects Portal and IHS Markit registry.

| Parameter | Current Status/ Numbers | Source | | | | | | | | | | | | | | | | |
|--|-------------------------|---|-------------|--------------|-----------|----|--------------------|---|----------|---|---------------|----|-------------------|----|-------------|-----|-------|-----|
| Accounts opened on GCC Projects Portal by Project Owners | 438 | Internal interface of GCC Projects Portal, not available publicly <table border="1"> <tr> <td>Total Users</td> <td>438 accounts</td> </tr> <tr> <td>GCC Staff</td> <td>11</td> </tr> <tr> <td>Steering Committee</td> <td>6</td> </tr> <tr> <td>Verifier</td> <td>5</td> </tr> <tr> <td>Project Owner</td> <td>48</td> </tr> <tr> <td>Project Supporter</td> <td>41</td> </tr> <tr> <td>Public User</td> <td>327</td> </tr> <tr> <td>Total</td> <td>438</td> </tr> </table> <p>To Open account: https://projects.globalcarboncouncil.com/users/sign_in</p> | Total Users | 438 accounts | GCC Staff | 11 | Steering Committee | 6 | Verifier | 5 | Project Owner | 48 | Project Supporter | 41 | Public User | 327 | Total | 438 |
| Total Users | 438 accounts | | | | | | | | | | | | | | | | | |
| GCC Staff | 11 | | | | | | | | | | | | | | | | | |
| Steering Committee | 6 | | | | | | | | | | | | | | | | | |
| Verifier | 5 | | | | | | | | | | | | | | | | | |
| Project Owner | 48 | | | | | | | | | | | | | | | | | |
| Project Supporter | 41 | | | | | | | | | | | | | | | | | |
| Public User | 327 | | | | | | | | | | | | | | | | | |
| Total | 438 | | | | | | | | | | | | | | | | | |
| Submitted projects | 194 | Internal interface of GCC Projects Portal, not available publicly | | | | | | | | | | | | | | | | |
| Completeness checks completed (GSC) | 125 | https://projects.globalcarboncouncil.com/pages/submitted_projects | | | | | | | | | | | | | | | | |
| Completeness check response awaited from Project Owner | 43 | Internal interface of GCC Projects Portal, not available publicly | | | | | | | | | | | | | | | | |
| Completeness checks in queue | 22 | Internal interface of GCC Projects Portal, not available publicly | | | | | | | | | | | | | | | | |
| Request for registration submitted by Project Owners | 4 | Internal interface of GCC Projects Portal, not available publicly | | | | | | | | | | | | | | | | |
| Registered Projects | 2 | https://projects.globalcarboncouncil.com/pages/approved_projects https://products.markit.com/br-reg/public/public-view/#/project | | | | | | | | | | | | | | | | |
| Projects Issued ACCs | 1 | https://products.markit.com/br-reg/public/public-view/#/issuance | | | | | | | | | | | | | | | | |
| ACCs issued by Steering Committee | 133,667 | https://products.markit.com/br-reg/public/public-view/#/issuance | | | | | | | | | | | | | | | | |
| ACCs transferred | 133,667 | https://products.markit.com/br-reg/public/public-view/#/holding | | | | | | | | | | | | | | | | |
| ACCs retired | None | https://products.markit.com/br-reg/public/public-view/#/retired | | | | | | | | | | | | | | | | |
| Accounts opened on IHS Markit Registry | 22 | https://products.markit.com/br-reg/public/public-view/#/account <p>To Open account: https://ihsmarkit.com/products/environmental-registry.html</p> | | | | | | | | | | | | | | | | |
| Expected projects submitted by end of 2022 | Estimated to be 300-500 | Market Intelligence Reports | | | | | | | | | | | | | | | | |

Last and this year has been the most successful year, despite COVID-19 pandemic, and has secured many remarkable achievements in context of GCC Program: (a) Significant outcomes related to full operations of GCC Program have been achieved this year, including successful submission and

processing of 125 GCC projects, out of which 125 (Refer to attached **Annex 5**) have cleared completeness checks for Global stakeholder consultation and are undergoing 3rd party verification, 2 projects have been registered and one project has issued ACCs. There is a market intelligence to have about 300-500 projects submitted by end of this year. Six third-party GCC verifiers are approved and 3 more are in pipeline. The GCC Registry has developed a new Issuance workflow and is preparing to be linked with exchanges for enhanced market access of ACCs by Q2 of 2022. (2) **CORSIA**: Securing full approval of CORSIA and conditional approval of ICROA for GCC Program; (3) **Green Events Tool**: Contributed and supported launch of Green Events Tool at COP26 in Glasgow.

(G) Demonstration of how a Project is assessed under GCC program through the entire project cycle:

A project undergoes the following steps in the entire GCC Project Cycle right from initial submission, through Registration stage, ACC Issuance Stage, ACC Transfer/Retirement Stage, as shown in the table below:

| Step | Activity | Actor responsible | Outcome/ Result |
|---|---|--------------------------------------|---|
| Registration Stage - online GCC Projects Portal | | | |
| 1 | Initial Submission of the Project Activity to GCC Program | Project Owner | - |
| 2 | Completeness check of submitted Project Activity | GCC Operations Team | Complete or Incomplete (sent back for resubmission after corrections) |
| 3 | Global Stakeholder Consultation of the Project Activity | | Comments submitted online by stakeholders |
| 4 | Project Verification of submitted Project Activity | GCC Project Verifier | Positive or Negative project Verification Opinion/ Report |
| 5 | Submission of 'Request for Registration' of submitted Project Activity | GCC Project Verifier & Project Owner | - |
| 6 | Completeness check of 'Request for Registration' of submitted Project Activity | GCC Operations Team | Complete or Incomplete (sent back for resubmission after corrections) |
| 7 | Assessment of 'Request for Registration' of submitted Project Activity and preparation of 'Registration Summary Note' | GCC Operations Team | 'Registration Summary Note', providing recommendation to the GCC Steering Committee |
| 8 | Decision on 'Request for Registration' of submitted Project Activity | GCC Steering Committee | 'Register or Reject' the 'Request for Registration' of submitted Project Activity |
| ACC Issuance Stage - online IHS Markit Carbon Registry | | | |
| 9 | Initial Submission of the Monitoring Report of the Project Activity to GCC Program, for a defined monitoring period (less or equal to the crediting period) | Project Owner | - |
| 10 | Completeness check of submitted Monitoring Report of the Project Activity | GCC Operations Team | Complete or Incomplete (sent back for resubmission after corrections) |
| 11 | Emission Reduction Verification of | GCC Emission | Positive or Negative Emission |

| | | | |
|---|---|---|--|
| | submitted Monitoring Report of the Project Activity | Reduction Verifier | Reduction Verification Opinion/ Report |
| 12 | Submission of 'Request for Issuance' of submitted Project Activity | GCC Emission Reduction Verifier & Project Owner | - |
| 13 | Completeness check of 'Request for Issuance' of submitted Project Activity | GCC Operations Team | Complete or Incomplete (sent back for resubmission after corrections) |
| 14 | Assessment of 'Request for Issuance' of submitted Project Activity and preparation of 'Issuance Summary Note' | GCC Operations Team | 'Issuance Summary Note', providing recommendation to the GCC Steering Committee |
| 15 | Decision on 'Request for Issuance' of submitted Project Activity | GCC Steering Committee | 'Issue or Reject' the 'Request for Issuance' of submitted Project Activity |
| ACC Transfer Stage - online IHS Markit Carbon Registry | | | |
| 16 | Online Transfer request of ACCs from Project Owner's Account | Project Owner | - |
| 17 | Review of Transfer request | GCC Operations Team | Initial Approval |
| 18 | Final Review of Transfer request | IHS Markit Team | ACCs transferred to buyers account |
| 19 | Account reconciliation | IHS Markit Team | ACCs deducted automatically from Project Owner's Account in the Registry |
| ACC Retirement Stage - online IHS Markit Carbon Registry | | | |
| 20 | Online Retirement request of ACCs from Account Owner's Account | Account Owner | - |
| 21 | Review of Retirement request | GCC Operations Team | Initial Approval |
| 22 | Final Review of Retirement request | IHS Markit Team | ACCs Retired from owners account for and generation of 'Certificate for achieving full or partial carbon neutrality' |
| 23 | Account reconciliation | IHS Markit Team | ACCs deducted automatically from Owner's Account in the Registry |

Two examples of demonstration of GCC Procedures and application of GCC requirements is presented using a real case study which shows how a project activity is processed through the complete Project Cycle Process and is given below:

- a) **Project 1:** Alibey WPP(S00001): IHSMarkitProject/ActivityID: 104000000027420: Refer to attached **Annex 3 (confidential document a)**.
- b) **Project 2:** Ova Hydro Power Plant Power Plant (S00002): IHS Markit Project/Activity ID: 104000000027760: Refer to attached **Annex 4 (confidential document)**.

(H) Future Developments and New Initiatives for triggering innovation in Climate Change Mitigation:

Since the last submission to the TAB/CORSIA, three new innovative initiatives have been taken by the GCC Program to further contribute to the achievement of the objectives of the Paris Agreement and the CORSIA program, which include:

- (a) **Development of methodological framework for innovative technology using Renewable Energy with Battery Storage:** The existing GCC Methodology (GCCM0001) has been revised to enhance mitigation by incorporating elements for Renewable Energy using battery storage and for captive applications particularly for rural and far-flung locations where electricity evacuation is not possible due to absence of grid transmission lines and infrastructure. Refer to: <https://www.globalcarboncouncil.com/global-carbon-council-releases-improved-methodology-to-support-renewable-energy-generation-projects/>
- (b) **Launch development of regulatory framework on negative or carbon removal technologies/measures**, expected to be completed by last quarter of this year:
 - (i) Carbon Capture and Storage and utilization and Direct Air capture
 - (ii) Nature Based Solutions including Afforestation and Reforestation
 - (iii) Methodological development on Grid connected battery storage system to enhance the utilization of RE across the grid (in collaboration with the World Bank)
- (c) **Active participation in World bank's Climate Warehouse Initiative:** GCC Program is the member of the Climate Warehouse Program, which is a global market infrastructure that can mobilise climate action to achieve the Paris Agreement's objectives by enhancing transparency and environmental integrity of carbon credit transactions and international carbon markets via use of technology for development of online Platform connecting all stakeholders. The Climate Warehouse is envisioned to have the following functions:
 - (i) **Connect national registries** to enable free flow of carbon credits between nations participating in the system.
 - (ii) **Connect independent carbon crediting standards** (Global Carbon Council, VCS, Gold Standard, etc.) to a common market where certain units are authorised for transfer from host countries – and are recognized for compliance by nations participating in the system.
 - (iii) Assure that units originated by national systems or independent carbon crediting standards can provide **unique proofs of authenticity** in agreed data formats to help avoid double counting before entering the system.
 - (iv) Provide for units to be **cancelled when they are tendered for compliance** with a national obligation or for voluntary purposes – so as to assure that they are not sold again or used twice.
 - (v) **Guard against theft and fraud**, including protections against counterfeit units entering the system.
 - (vi) Provide **dispute resolution mechanisms** and remedies for failures in national systems that may impact system performance.
 - (vii) Preserve a **competitive model for private sector** buyers, sellers, intermediaries and financial services to grow organically around it.

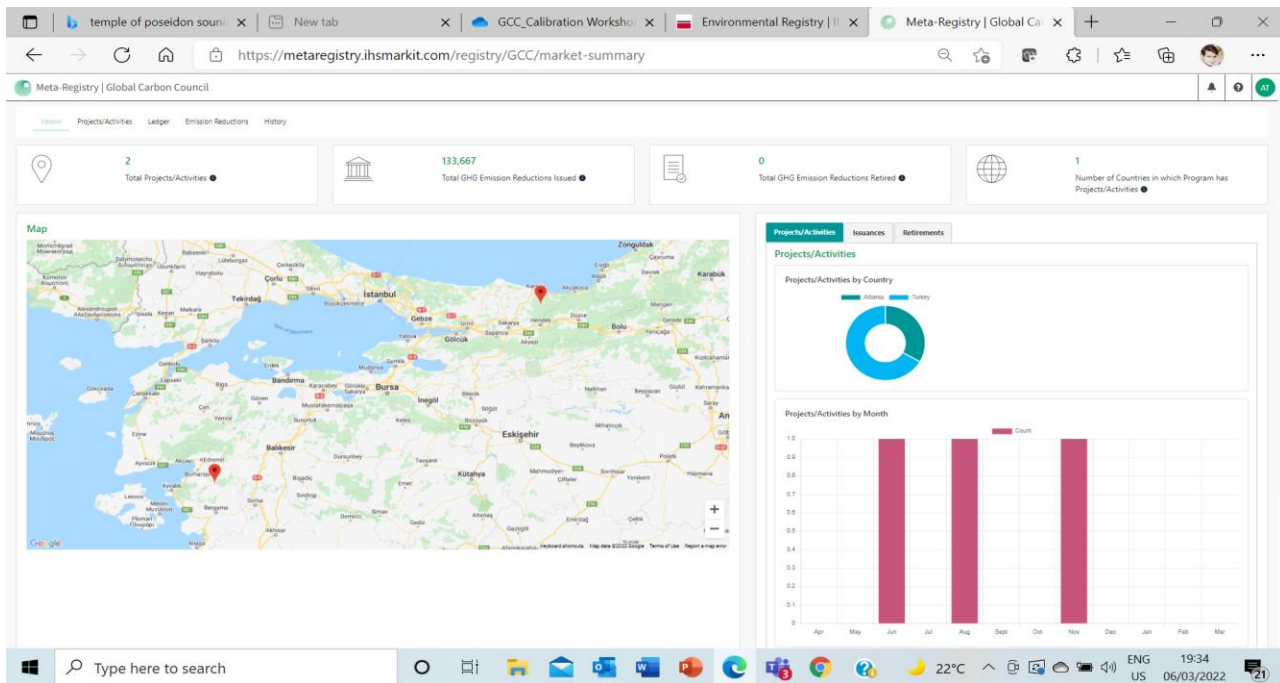
This is a useful tool for GCC Verifiers and stakeholders to track online the project information

particularly related for avoiding double registration and ACC issuance and double claiming.

(d) **Active participation in IHS Markit Meta registry:** A online platform (<https://metaregistry.ihsmarket.com/>) linking all GHG programs and registries to avoid double registration, issuance and double claiming. This is a useful tool for GCC Verifiers and stakeholders to track online the project information particularly related for avoiding double registration and ACC issuance and double claiming. Screen shots below present that there is no conflict on the geo-coordinates for two projects registered and double selling/claiming of ACCs issued (by tracking the 56-digit unique tracking numbers) by GCC program across 5971 projects listed across 126 countries from 8 GHG Programs linked on the IHS Markit Meta registry and therefore there is no risk of Double registration/Issuance.

Project 1: Alibey WPP (S00001): IHS Markit Project/Activity ID: 104000000027420

Project 2: Ova Hydro Power Plant Power Plant (S00002): IHS Markit Project/Activity ID: 104000000027760



Meta-Registry | Global Carbon Council

Home **Projects/Activities** Ledger Emission Reductions History

Search Country

| Project / Activity Name | Country | Project / Activity ID | Country Approval |
|-----------------------------------|---------|-----------------------|------------------|
| Alibey WPP | Turkey | 10400000027420 | |
| Ova Hydro Power Plant Power Plant | Turkey | 10400000027760 | |

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Meta-Registry | Global Carbon Council

Home Projects/Activities Ledger **Emission Reductions** History

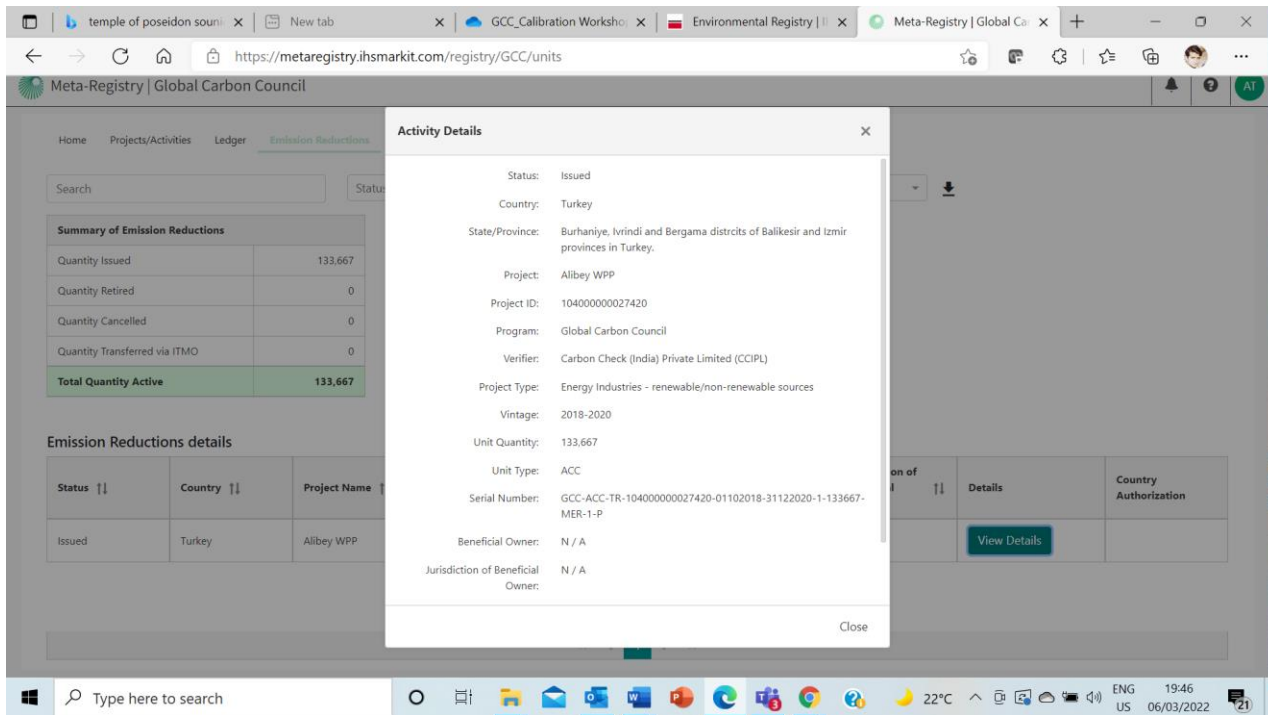
Search Status Country

| Summary of Emission Reductions | |
|--------------------------------|----------------|
| Quantity Issued | 133,667 |
| Quantity Retired | 0 |
| Quantity Cancelled | 0 |
| Quantity Transferred via ITMO | 0 |
| Total Quantity Active | 133,667 |

Emission Reductions details

| Status | Country | Project Name | Program | Vintage | Unit Quantity | Jurisdiction of Beneficial Owner | Details | Country Authorization |
|--------|---------|--------------|-----------------------|-----------|---------------|----------------------------------|------------------------------|-----------------------|
| Issued | Turkey | Alibey WPP | Global Carbon Council | 2018-2020 | 133,667 | | View Details | |

Windows taskbar: Type here to search, 22°C, 19:39, 06/03/2022



- (e) **Connection to carbon credit Exchanges:** GCC Program has been approached by multiple carbon exchanges to link the GCC carbon registry (operated by HIS Markit), which is expected to improve and enhance access to multiple markets across the world and facilitate the access to ACCs. GCC Program is current evaluating this possibility and is expected to realize this outcome by Q2 of this year.

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 re-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 re-assessment; and

as a condition of participating in the re-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 re-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:

Kishor Rajhansa

10 March 2022

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 Re-Assessment Application Form, Appendix B

Programme Re-Assessment Scope

CONTENTS: List all activities and methodologies/protocols that were assessed by TAB, and are currently within the Scope of Eligibility. Programmes may define additional activities and methodologies/protocols programmes for TAB's re-assessment.

- Sheet A) Activities the programme previously assessed by TAB and within the Scope of Eligibility under CORSIA
- Sheet B) List of all methodologies / protocols that support activities described under Sheet A
- Sheet C) Activities that are not previously-assessed or excluded for assessment by TAB that programmes wish to add for TAB's re-assessment
- Sheet D) List of all methodologies / protocols that support activities described under Sheet C



| ICAO

Programme Re-Assessment Application Form, Appendix C

Programme Exclusions Scope

CONTENTS: List all activities and methodologies/protocols that were excluded from TAB's assessment or outside of Scope of Eligibility. Programmes may define additional activities and methodologies/protocols programmes to be **excluded** from TAB's re-assessment. The four sheets are described below:

- Sheet A) Activities that were **excluded** from TAB's assessment, or is outside of programme's Scope of Eligibility
- Sheet B) List of all methodologies / protocols that support activities described under Sheet A
- Sheet C) Additional activities that the programme wish to **exclude** from TAB's re-assessment
- Sheet D) List of all methodologies / protocols that support activities described under Sheet C

Emissions Unit Programme Registry Attestation

(Version 2, January 2022)

PART A. Applicability and Instructions

1. Relevance and definitions:

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

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

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

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

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

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

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

2. Programme - registry relationship:

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

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

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

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

3.3.1. Forward the signed attestation to the TAB; and

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

PART B: Emissions Unit Programme Registry Attestation

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

4.1. I have read and fully comprehend the following information:

4.1.1.The instructions and terms of this attestation;

4.1.2.The contents of the ICAO document “*CORSIA Emissions Unit Eligibility Criteria*”;

4.1.3.The contents of the most recent version of the application form that the Programme has provided to the ICAO Secretariat; and

4.1.4.The terms, conditions and limitations to the Programme’s scope of eligibility and further action(s) requested to the Programme by the ICAO Council, as presented to the Programme upon relevant decision of the ICAO Council on the Programme’s eligibility¹.

4.2. The Programme’s representation of its provisions and procedures governing the Programme Registry, and of Programme Registry functionality, as contained in the most recent version of the application form that the Programme has provided to the ICAO Secretariat, is true, accurate, and complete, to the best of my knowledge;

4.3. The Programme Registry will notify the Programme of any material changes to the Programme Registry, to enable the Programme to maintain consistency with relevant criteria and guidelines throughout its assessment by TAB and up to an eligibility decision by the ICAO Council; and, if applicable, continuing on from the effective date of an affirmative eligibility decision by the ICAO Council, the Programme Registry will notify the Programme of any material changes to the Programme Registry, such that the Programme can maintain consistency with relevant criteria and guidelines;

4.4. The Programme Registry and Registry Representative will not publicly disseminate, communicate, or otherwise disclose the nature, content, or status of communications between the Programme, the Programme Registry, and/or the ICAO Secretariat, related to the status of the Programme’s provision of programme and registry services under the CORSIA, unless the Programme has received prior notice from the ICAO Secretariat that such information has been and/or can be publicly disclosed.

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

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

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

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

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

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

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

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

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



Programme Representative Signature

Dr. Yousef Alhorr

Programme Representative Name

Global Carbon Council

Programme Name

March 8, 2022

Date

DocuSigned by:
Michelle Loader
0471E9E8011B46A...

Registry Representative Signature

Michelle Loader

Registry Representative Name

Global Carbon Council Registry

Registry Name

March 7, 2022

Date

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

ATTACHMENT A: PROGRAMME REGISTRY ATTESTATION DISCLOSURE FORM

PART 1: INSTRUCTIONS FOR REGISTRY REPRESENTATIVE

The following information request corresponds to the registry representative's certification of its adherence to items 7.1 to 7.11 of the *Emissions Unit Programme Registry Attestation* "Scope of Programme Registry responsibilities under the CORSIA".

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

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

PART 2: PROGRAMME AND REGISTRY REPRESENTATIVE INFORMATION

1. Programme Representative Information

A. Programme Information

Programme name:

Administering Organization⁵:

Official mailing address:

Telephone #:

Official web address:

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

Full name and title:

Employer / Company (*if not programme*):

E-mail address:

Telephone #:

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

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

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

Full name and title:

Employer / Company (*if not Programme*):

E-mail address:

Telephone #:

2. Registry Representative Information⁶

A. Registry Information

Registry / system name:

Administering Organization:

Official mailing address:

Telephone #: Telephone #:

Official web address:

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

Full name and title:

Employer / Company (*if not Registry Administering Organization*):

E-mail address:

Telephone #:

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

Full name and title:

Employer / Company (*if not Registry Administering Organization*):

E-mail address:

Telephone #:

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

PART 3: EVIDENCE OF ADHERENCE TO SCOPE OF REGISTRY RESPONSIBILITIES

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| | Does the Programme Registry fully meet the objectives of any and all Programme provisions and procedures related to the Programme Registry that the Programme is required to have in place in the manner represented by the Programme in the application form that the Programme has provided to the ICAO Secretariat and, if applicable ⁷ , as acknowledged by the Programme in the signed “Programme acceptance to terms of eligibility for inclusion in the ICAO document “ <i>CORSIA Eligible Emissions Units</i> ”? | ✓ YES |
| 7.1 | <p>Describe how the Registry ensures its ability to implement these provisions:</p> <p>IHS Markit collaborated with Global Carbon Council (“GCC”) in the development and submission of the original application sent to the ICAO Secretariat. As a result, IHS Markit is confident that the GCC registry fully meets ICAO’s objectives.</p> <p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> <p>Global Carbon Council Registry Public View: https://mer.markit.com/br-reg/public/public-view/#/account</p> | |

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| | Will the Programme Registry ensure that a CORSIA participant’s request for a registry account will not be denied solely on the basis of the country in which the requestor is headquartered or based? | ✓ YES |
| 7.2 | <p>Describe how the Registry does or will implement this provision:</p> <p>As the registry provider for GCC, IHS Markit conducts “know-your-customer” due diligence checks on every registry account application. The country in which the requestor is headquartered or based is not a deciding factor in the due diligence process.</p> <p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> <p>IHS Markit Registry’s Terms and Conditions: https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf.</p> <p>The IHS Markit registry business practices and procedures are not available for public consumption.</p> | |

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

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| | Will the Programme Registry (in the case of applicants to be assessed to determine their eligibility)/Does the Programme Registry (when the Programme is determined to be eligible by a decision of the ICAO Council) identify / label its CORSIA eligible emissions units as defined in the ICAO Document “ <i>CORSIA Eligible Emissions Units</i> ”? | ✓ YES |
| 7.3 | Describe how the Registry does or will implements this provision: | |
| | <p>IHS Markit’s registry features the ability to designate appropriate market eligibility of individual units. It is built upon a workflow engine which allows for units to proceed through a range of status changes. These status changes include transfers from one account to another, and through the credit lifecycle including from pending issuance through retired or cancelled. The IHS Markit registry also assigns unique 54-digit serial numbers (e.g., Serial No: GCC-ACR-QA-10400000026284-01012018-31122018-11001-12000-MER-0-P) to issued GCC carbon credits, i.e., ACCs, that can be tracked from when the unit is issued through to its transfer or use (cancellation or retirement) via the registry system. A clear chain of custody is maintained by IHS Markit in the registry.</p> <p>Regarding distinguishing units, all units in the Registry have a flag which denotes whether they are CORSIA-eligible. Once this indicator flag is appended to units by the registry administrator and regulator, then they are clearly distinguishable from other voluntary or compliance units. This means that the job of any Airline Operator or ICAO gets simplified to identify emission units that are eligible under CORSIA. The assigning of the “CORSIA-Compliant” flag by GCC is be done if the projects are registered and associated emission units/credits (i.e. ACCs) are issued based on the confirmation that the relevant GCC rules that incorporate the CORSIA’s ‘EMISSIONS UNITS CRITERIA (EUC)’ have been applied in implementation and monitoring of projects.</p> | |
| | In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> . | |
| | <p>Global Carbon Council Registry Public View:</p> <p>https://mer.markit.com/br-reg/public/public-view/#/account</p> | |

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| | Will the Programme Registry, upon request of the CORSIA participant account holder or participant’s designee, designate the participant’s cancellation of emissions units for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle? | ✓ YES |
| 7.4 | Describe how the Registry does or will implement these provisions: | |
| | The Registry features the ability for users to input both structured and unstructured information when cancelling or retiring units. This information is input directly in the retirement or cancellation request form. | |
| | In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> . | |
| | IHS Markit Registry’s Terms and Conditions: | |

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| | <p>https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf.</p> <p>The IHS Markit registry business practices and procedures are not available for public consumption.</p> |
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| 7.5 | <p>a. Will the Programme Registry, within 1 – 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of holding and cancelling CORSIA Eligible Emission Units within the registry, and barring system downtime that is scheduled in advance or beyond the control of the registry administrator, make visible on the Programme Registry’s public website the account owner’s cancellations of CORSIA Eligible Emission Units as instructed.</p> | ✓ YES |
| | <p>b. Will such cancellation information (row a) include all fields that are specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV?</p> | ✓ YES |
| | <p>Describe how the Registry does or will implement these provisions:</p> | |
| | <p>The status change of credits is visible on the public view the moment all actions are approved within the registry. In this way, the cancellation of CORSIA-eligible units will be immediately reflected on the public view. In addition, the registry includes a “remarks” field which users can enter when cancelling units. These remarks are displayed registry’s public webpage as well.</p> | |
| | <p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> | |
| <p>Global Carbon Council Registry Public View: https://mer.markit.com/br-reg/public/public-view/#/account</p> | | |

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| 7.6 | <p>Will the Programme Registry, upon request of the CORSIA participant account holder or participant’s designee, generate report(s) containing the information specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV?</p> | ✓ YES |
| | <p>Describe how the Registry does or will implement this provision:</p> | |
| | <p>IHS Markit recognizes the importance of the ability to export available information into downloadable reports including projects, issuances, transfers and retirements. Registry reports enable users to track their activities on the Registry and evaluate the status of their projects and/or holdings. Users may export information about projects, issuances, current holdings, retirements and transfers to both Excel and PDF file formats. In addition, users have access to an activity log allowing them to view all events that took place within their account within a specific time period. IHS Markit also offers consolidated reporting with information on all accounts, projects and credits in the Global Carbon Council program.</p> | |
| <p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> | | |

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| | These features require a user to have a username and password; consequently, they are only available in web-based format for those with access to the registry. |
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| 7.7 | a. Does the Programme Registry maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants' designees, and transaction events carried out by a user? | ✓ YES |
| | b. Does the Programme Registry disclose documentation of such practices (row a) upon request? | ✓ YES |
| | c. Does the Programme Registry utilize appropriate method(s) to authenticate the identity of each user accessing an account? | ✓ YES |
| | d. Does the Programme Registry grant each user access only to the information and functions that a user is entitled to? | ✓ YES |
| | e. Does the Programme Registry utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user? | ✓ YES |
| | f. Do such security features (rows a – e) meet and undergo periodic updates in accordance with industry best practice? | ✓ YES |
| | Describe how the Registry implements each provision in rows a – f: | |
| Due to confidentiality concerns, IHS Markit does not disclose externally its security provisions beyond those outlined in the IHS Markit Registry's terms and conditions: https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf and IHS Markit's Information Security Overview: https://cdn.ihsmarkit.com/www/pdf/1018/IHS-Markit-Information-Security-Overview-External.pdf . | | |
| In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> . | | |
| Please see the terms and conditions and Information Security Overview listed above. | | |

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| 7.8 | a. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant's designee, notify the CORSIA participant account holder or their designee? | ✓ YES |
| | b. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant's designee, notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme's application form? | ✓ YES |
| | Describe how the Registry does or will implement each provision in rows a and b: | |

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| | <p>IHS Markit understands that our clients expect our products to maintain consistent high standards of security and business continuity. For this reason, IHS Markit considers software security and business continuity as a key element of our product and service offerings. With regard to security, IHS Markit has developed an approach that focuses on our main assets: people and software. Guided by our principles of innovation and transparency, we have fused these to create a unique industry program offering our clients greater levels of comfort and security.</p> <p>Our software security program is a company-wide initiative guided by a risk management framework developed in collaboration with our security team, senior development management and industry leaders in secure coding. The program’s aims are to detect, assess and address security issues before they enter production environments. Our commitment is to embed the use of secure coding and source code reviewing into the development cycle.</p> <p>As part of the registry platform, IHS Markit maintains a secure entitlement framework around the management of the registry services, which in turn allows only approved users to access confidential data. Access to registry data via web interface is restricted to approved registered users that have registered and gone through know-your-customer (“KYC”) checks.</p> <p>If a data breach is found to have impacted any registry account, the Account Holder and Program Administrator (i.e. GCC) will be immediately notified by the IHS Markit team.</p> |
| | <p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> |
| | <p>Please see the terms and conditions and Information Security Overview listed in response to 7.6.</p> |

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| | <p>Does the Programme Registry ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV, and ETM, Volume IV⁸?</p> | <p>✓ YES</p> |
| 7.9 | <p>Describe how the Registry implements these provisions:</p> <p>Once a unit is cancelled on the registry, it can no longer be actioned. Users are unable to select any “action” buttons (such as Transfer or Retire) for that unit or block. Similarly, once a unit is retired on the registry, it can no longer be actioned. Users are unable to select any “action” buttons (such as Transfer) for that unit or block, thereby eliminating the ability of that cancelled or retired credit to be sold.</p> <p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> <p>IHS Markit’s policy on unit cancellations is available in the IHS Markit Registry’s terms and conditions: https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf</p> | |

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

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| | a. Does the Programme Registry ensure that all cancellation information on its website is presented in a user-friendly format? | ✓ YES |
| | b. Does the Programme Registry ensure that all cancellation information on its website is available at no cost and with no credentials required? | ✓ YES |
| | c. Does the Programme Registry ensure that all cancellation information on its website is capable of being searched based on data fields? | ✓ YES |
| | d. Does the Programme Registry ensure that all cancellation information on its website can be downloaded in a machine-readable format, e.g., .xlsx? | ✓ YES |
| | Describe how the Registry implements each provision in rows a – d: | |
| 7.10 | The Global Carbon Council registry public view is available to all members of the public at no cost and with no credentials required in a user-friendly format. The public view will reflect all cancellation information that the user or regulator (i.e. GCC) has chosen to make publicly available. Reports can be exported from the registry into machine-readable formats. | |
| | In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> . | |
| | Global Carbon Council Registry Public View: https://mer.markit.com/br-reg/public/public-view/#/account | |

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| | a. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations on an ongoing basis and for at least three years beyond the end date of the latest compliance period in which the emissions unit programme is determined to be eligible? | ✓ YES |
| | b. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations consistent with the Programme's long-term planning, including plans for possible dissolution? | ✓ YES |
| | Describe how the Registry does or will implement each provision in rows a and b: | |
| | IHS Markit handles and retains both information (documents and data) within and output from systems in accordance with applicable local, state and Federal laws, as well as program regulatory requirements. | |
| 7.11 | IHS Markit retains audit records for an organization-defined time period consistent with records retention requirements to provide support for after-the-fact investigations of security incidents and to meet program and organizational information retention requirements. IHS Markit uses vendor-recommended settings and industry-recognized secure practices to ensure audit records are retained as necessary by legal or contractual requirements to provide support for investigations of incidents and to meet data retention requirements. | |
| | In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme | |

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| | <p>Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> |
| | <p>Please see the IHS Markit Information Security Overview: https://cdn.ihsmarkit.com/www/pdf/1018/IHS-Markit-Information-Security-Overview-External.pdf</p> |