

**CORSIA Eligible Emissions Unit Programme Change Notification Form**  
*Version 2.0; Effective from 10 January 2022*

**PART A: ABOUT THIS FORM**

Once an emissions unit programme is approved by the ICAO Council as eligible to supply CORSIA Eligible Emissions Units, the programme commits to notify the ICAO Secretariat of any “material changes” to its “Scope of Eligibility”, *including any unilateral decision to revoke or invalidate a class of CORSIA- eligible emission units within the programme’s Scope of Eligibility*, for further review<sup>1</sup> by the Technical Advisory Body (TAB) that advises the ICAO Council on the eligibility of emissions units for use in CORSIA.

*TAB Procedures*<sup>2</sup> defines a “Material Change” as an update to a programme’s *Scope of Eligibility* that would alter the programme’s response(s) to any questions in its application form and further inquiries from the TAB over the course of the programme’s assessment, including programme-initiated unit invalidation and/or revocation. (paragraph 7.3.).

*TAB Procedures* defines a CORSIA Eligible Emissions Unit Programme’s *Scope of Eligibility* as “the extent and limits of a programme’s eligibility, which is defined, assessed, and granted on the basis of the programme-level governance structures, measures or mechanisms, and procedures that programmes have in place at the time of their initial submission of application materials to the ICAO Secretariat; and any updates to these procedures that are communicated to TAB during the course of its assessment; and as defined in the general or programme-specific eligibility parameters set out in TAB’s recommendations” (paragraph 4.5).

Annually, TAB will indicate deadlines for programmes to notify ICAO of any such material changes. These notifications should be submitted by the next deadline after the material change has occurred; the upcoming deadlines are indicated in the version of the *TAB Work Programme and Timeline* document that is currently effective. This document is available on the CORSIA website<sup>3</sup>.

Material changes should be disclosed using this form. TAB will then consider the need for any further review, in line with *TAB Procedures*. If TAB identifies that the change is indeed material and should be further assessed, it will invite public comments on the consistency of the proposed revision with the Emissions Unit Criteria (EUC) and *Guidelines for Criteria Interpretation*. The ICAO Secretariat will inform the programme of TAB’s decision to more deeply assess the programme’s modification, or its confirmation that the modification is consistent with the CORSIA EUC. The programme will also be informed of the date by which the review will be completed. The length of the review should be determined by the severity and scale of the material change.

**PART B: PROGRAM CHANGE NOTIFICATION(S)**

The Programme is requested to provide the following information regarding any modification(s) to the programme’s *Scope of Eligibility* that could constitute a “material change” as described above. Report each change separately by duplicating (copying and pasting) the table below as needed.

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<sup>1</sup> Any unilateral programme-initiated invalidation and/or revocation of a class of CORSIA-eligible emissions units is considered to be a “material change” to the CORSIA-eligible programme’s *Scope of Eligibility*. Such units are regarded as immediately ineligible for use for CORSIA purposes in light of absence of assurance that it will administer the units consistent with its *Terms of Eligibility*. The units will be reflected as exclusions from the programme’s *Scope of Eligibility* in the ICAO Document “CORSIA Eligible Emissions Units” upon Council’s confirmation of the update. Once a programme notifies ICAO that it wishes to exclude a class of units from its eligibility scope, and in order to provide the most accurate and timely information available prior to Council’s confirmation of the update, the ICAO Document “CORSIA Eligible Emissions Units” will identify in a footnote that the programme requested a change to its *Scope of Eligibility* to exclude certain units subject to a decision by the ICAO Council and, if possible, clearly specify the affected class of units. The programme’s *Scope of Eligibility* that is deemed valid by the ICAO Council will be reflected in the ICAO Document titled “CORSIA Eligible Emissions Units” in a timely manner

<sup>2</sup> In *TAB Procedures*, paragraphs 4.5, 7.3 and 8.2 – 8.6 in particular pertain to the *Scope of Eligibility* and notification and assessment of material changes.

<sup>3</sup> The *TAB Work Programme and Timeline* and *TAB Procedures* documents are available here:  
<https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx>

**Programme name:** American Carbon Registry (ACR)

**CHANGE 1**

a. Description of the change (e.g., the addition, modification, deletion undertaken):

The names and titles of Program’s senior staff / leadership, including board members is as follows:

Environmental Resources Trust (ERT) / American Carbon Registry (ACR) Management:

Board of Directors of Environmental Resources Trust (all also Winrock Board members)

Rodney Ferguson, President and CEO, Winrock International

William Bumpers, Winrock Honorary Director, (Retired) Baker Botts Law Firm

Michaela Edwards, Partner at Capricorn Investment Group

John Nees, Founding Partner of the Getty Land Company

Stacy Swann, CEO and founding partner of Climate Finance Advisors

Officers of Environmental Resources Trust

Mary Grady, President and Chief Executive Officer

Judith Weishar, CFO

American Carbon Registry Senior Staff

Mary Grady, Executive Director

Jessica Bede, Managing Director

Maris Densmore, Director of Industrial Solutions

Kurt Krapfl, Director of Forestry

Breffni Lynch, Director of Registry Operations

Brad Kahn, Director of Communications

b. Rationale for the change:

Board, management and staff changes (departures, additions, promotions) as normal in due course of business.

c. Where the change is reflected in the Programme’s documentation or other resource(s)<sup>4</sup>:

The change is noted publicly on the “About Us” webpage of ACR’s website:

<https://americancarbonregistry.org/about-us/mission>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

References to these ACR leadership were included in the March 2022 Re-assessment Application, including:

*Section III, Part 1, D. Programme Senior Staff / Leadership*

Board of Directors of Environmental Resources Trust (all also Winrock Board members)

Rodney Ferguson, President and CEO, Winrock International

William Bumpers, Winrock Honorary Director, (Retired) Baker Botts Law Firm

Suzanne Siskel, Winrock Board Vice Chair, EVP & COO of The Asia Foundation

John Nees, The Getty Land Company

<sup>4</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

Officers of Environmental Resources Trust  
Mary Grady, President and Chief Executive Officer  
Lauren Nichols, Vice President  
Mike Myers, CFO/Treasurer  
Charlotte Young, Secretary

American Carbon Registry Senior Staff  
Mary Grady, Executive Director  
Lauren Nichols, Managing Director  
Margaret Williams, Technical Director  
Maris Densmore, Director of Engineered Solutions  
Kurt Krapfl, Director of Forestry  
Jessica Bede, Director of Registry Operations

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

## **CHANGE 2**

a. Description of the change (e.g., the addition, modification, deletion undertaken):

While not a material change since this update is as a result of having followed ACR’s policies, procedures and approaches as previously described to the TAB, ACR has made methodologies inactive, has updated methodologies and has approved new methodologies.

b. Rationale for the change:

Per the ACR Standard, ACR periodically reviews its approved methodologies and associated performance standards. ACR may inactivate methodologies if the performance standard needs review or the activities or MRV methods are deemed to no longer meet ACR requirements. ACR may update methodologies based on new technical or market information and/or develop and approve new methodologies.

c. Where the change is reflected in the Programme’s documentation or other resource(s)<sup>5</sup>:

The change is noted publicly on the “Standards & Methodologies” webpage of ACR’s website: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

References to individual methodologies were included in the March 2022 Re-assessment Application, including:

*Section III, Part 3, Question 3.2. Scope considerations (referring to ACR’s original application July 2019)*

d) A list of methodologies with a 10 year crediting period

<sup>5</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

*Section III, Part 4, Question 4.1. Are additional (referring to ACR's response to TAB live discussion questions November 2019)*

- ii. A list of methodologies with practice-based performance standards

*Section III, Part 4, and Question 4.1. Are additional (referring to ACR's original application July 2019)*

A table showing which method of additionality each ACR-approved methodology employs  
*Section III, Part 4, and Question 4.5. Represent permanent emissions reductions (referring to ACR's original application July 2019)*

A list of project types that claim offset credits from carbon sequestration

*Section III, Part 4, and Question 4.6. Assess and mitigate against potential increase in emissions elsewhere (referring to ACR's original application July 2019)*

A list of activity types that present potential risk of material emissions leakage and methodologies that include required deductions for leakage.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

### **CHANGE 3**

a. Description of the change (e.g., the addition, modification, deletion undertaken):

ACR has adjusted the terminology used to identify its CORSIA eligible emissions units on the ACR Registry, ACR Standard, and ACR Registry Operating Procedures. ACR now uses "CORSIA Eligible" for units that can be used by aeroplane operators towards their CORSIA targets and "CORSIA Pending" for units that meet the CORSIA eligibility parameters but do not fully meet other criteria or need additional steps in order to be used in CORSIA.

b. Rationale for the change:

This update was made in accordance with email correspondence with the TAB in June 2023.

c. Where the change is reflected in the Programme's documentation or other resource(s)<sup>6</sup>:

The change in terminology is reflected publicly on the ACR Registry <https://acr2.apx.com/>, within the ACR Standard available from the "Standards & Methodologies" webpage of ACR's website: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>, and in the ACR Registry Operating Procedures available from the "Open an Account" webpage of ACR's website: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>.

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

<sup>6</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

References to the previously utilized terminology were included in the March 2022 Re-assessment Application, including:

*Section III, Part 3, Question 3.4. Identification and Tracking (referring to ACR's original application July 2019)*

- a) ACR's registry platform currently includes an internal "ARB Eligible" designation for each of the issued serialized credit batches to indicate which ones are eligible for conversion to ARBOCs under the California State Cap-and-Trade program, and conversely which ones are strictly voluntary program credits. ACR's public report of Credits Issued (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=112>) shows the current "ARB Eligible" distinction. Similarly, this kind of distinction could be easily created to display CORSIA eligibility status for credits issued on ACR. Per the *Guidelines for Avoiding Double Counting for the CORSIA* (available at <https://www.adc-wg.org/guidelines-version-1-0> and incorporated by reference to ACR Standard v6.0), units can be designated as "CORSIA Qualified" if they have been approved for use for CORSIA by ICAO (approved program, project type, vintage etc.) and have obtained a letter of Assurance and Authorization (for use of the units for CORSIA or other "export" purpose) from the Host Country.

*Section III, Part 3, Question 3.4. Identification and Tracking (referring to ACR's Programme Clarification October 2019)*

ACR's registry platform currently includes an "ARB Eligible" designation for each of the issued serialized credit batches to indicate which ones are eligible for conversion to ARBOCs under the California State Cap-and-Trade program, and conversely which ones are strictly voluntary program credits. ACR's public report of Credits Issued (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=112>) shows the current "ARB Eligible" distinction.

Similarly, the ACR registry can designate CORSIA eligibility / qualification status for credits issued. Per the *Guidelines for Avoiding Double Counting for the CORSIA* (available at <https://www.adc-wg.org/guidelines-version-1-0> and incorporated by reference to ACR Standard v6.0), and per new ACR Standard Appendix C, included as Attachment A to this response, units can be designated as "CORSIA Qualified" if they have been approved as eligible for use for CORSIA by ICAO (approved program, project type, vintage etc.), have obtained a Host Country Letter of Assurance and Authorization (for use of the units for CORSIA or other "export" purpose) and have met other CORSIA and ACR requirements.

*Section III, Part 3, Question 3.4. Identification and Tracking (referring to ACR's Registry Attestation March and April 2021)*

ACR indicated that the described registry functionality to tag units as CORSIA Qualified had been implemented. The functionality is as follows: Upon request for credit issuance the project developer will indicate whether or not they intent to offer their verified credits for CORSIA. ACR staff then reviews the eligibility of any CORSIA intended batches of credits (as determined by ACR as an approved program, alignment with approved project type, and eligible vintage etc.). Those with confirmed eligibility can be marked as "CORSIA Eligible" in the registry which will be noted on the Credit Details screen that appears upon clicking on a number of credits. For vintage 2016-2020 ACR staff can then mark confirmed eligible credits as "CORSIA Qualified". For post 2020 vintages ACR staff will review eligibility but will only mark the credits as "CORSIA Qualified" once the project has obtained a letter of Assurance and Authorization (for use of the units for CORSIA or other "export" purpose) from the Host Country and submitted an approved CORSIA double claiming

Compensation Mechanism. These requirements for post-2020 units are described in Appendix B of the ACR Standard.

ACR, ACR's public report of Credits Issued (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=112>) shows the deployed "ARB Qualified" distinction.

*Section III, Part 4, Question 4.7. Are only counted once towards a mitigation obligation (referring to ACR's responses to clarification questions from TAB December 2020)*

ACR only currently requires Host Country letters of authorization for credits to be used by aeroplane operators to meet CORSIA compliance obligations. However, it is possible, at the Host Country discretion, to authorize the use of credits more broadly. All (post 2020) credits that have a Host Country authorization will be tagged as such, and those that meet other CORSIA requirements (project start date, vintage), will be tagged as "CORSIA qualified."

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

#### **CHANGE 4**

a. Description of the change (e.g., the addition, modification, deletion undertaken):

While not a material change since this update is as a result of having followed ACR's policies, procedures and approaches as previously described to the TAB, ACR released an updated version of the ACR Standard (version 8.0) which contains updates to the complaints procedure (Chapter 11).

b. Rationale for the change:

This update expanded on the previous complaints and appeals process to provide additional detail on principles, scope, process steps and timing for complaints and appeals.

c. Where the change is reflected in the Programme's documentation or other resource(s)<sup>7</sup>:

The change is noted publicly in the ACR Standard available on the "Standards & Methodologies" webpage of ACR's website: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

Previously submitted information would not be altered as a result of this update but more detail on the principles, scope, and process is now available.

*Section III, Part 3, Question 3.7. Programme governance (referring to ACR's original application July 2019)*

Further, the ACR Standard Chapter 11 addresses procedures for complaints and appeals to decisions taken by ACR as described below.

<sup>7</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.



Complaints: When a Project Proponent or ACR stakeholder objects to a decision made by ACR representatives or the application of the ACR program requirements, the following confidential complaint procedure shall be followed:

1. [REDACTED]  
[REDACTED]
  - [REDACTED]  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
  - [REDACTED]  
[REDACTED]
  - [REDACTED]
- [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- [REDACTED]  
[REDACTED]

Appeals: In the event that a complaint remains unresolved after the conclusion of the complaints procedure, an ACR Project Proponent or stakeholder may appeal any such decision or outcome reached. The following confidential appeals procedure shall be followed:

1. [REDACTED]  
[REDACTED]
  - [REDACTED]  
[REDACTED]
  - [REDACTED]  
[REDACTED]  
[REDACTED]
  - [REDACTED]  
[REDACTED]
- [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
- [REDACTED]  
[REDACTED]  
[REDACTED]

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

**CHANGE 5**

a. Description of the change (e.g., the addition, modification, deletion undertaken):

While not a material change since this update is as a result of having followed ACR’s policies, procedures and approaches as previously described to the TAB, ACR released an updated version of the ACR Standard (version 8.0) which contains updates to some of the attestation language as well as from whom and at what stages of the project cycle they are required.

**b. Rationale for the change:**

To add an additional layer of assurance of accuracy, ACR introduced attestations by the Project Proponent (and the Project Developer Account Holder, if not the same entity) regarding the content in the GHG Project Plan and all appendices.

To reduce the burden on Project Proponents and Project Developer Account Holders, when not the same entity, ACR now accepts attestations by either party in the Monitoring Report.

To reduce overall paperwork, ACR migrated the attestation by a Validation/Verification Body from a standalone form into the Application for Validation/Verification Body Approval.

To improve clarity and further strengthen requirements of the Standard, ACR updated the language of certain existing attestations and included new attestations.

**c. Where the change is reflected in the Programme’s documentation or other resource(s)<sup>8</sup>:**

The changes are noted publicly in the ACR Standard available on the “Standards & Methodologies” webpage of ACR’s website: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>.

Changes are also reflected in the templates available on the “Guidance, Tools & Templates webpage of ACR’s website: <https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates> (see Template for ACR GHG Project Listing Form, Template for ACR GHG Project Plan, Template for ACR Monitoring Report, Template for ACR Renewed Crediting Period Listing Form) and the “Verification” webpage of ACR’s website: <https://americancarbonregistry.org/carbon-accounting/verification/verification> (see Project-Specific Conflict of Interest Form and Application for Validation/Verification Body Approval).

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

Relevant references to the previously utilized language and processes were included in the March 2022 Re-assessment Application, including:

*Section III, Part 3, Question 3.6. Validation and verification procedures (referring to ACR’s original application July 2019)*

<b>Item</b>	<b>Definition, Process or requirement</b>
VVB requirements	All VVBs must apply and be approved by ACR to meet requirements including scope accreditation and technical capabilities of the VVB and individuals, disclosure and mitigation of conflicts of interest, insurance and others as detailed in the Attestation of Validation / Verification Body. VVBs must be approved by ACR and be accredited under ISO 14065 by an accreditation body that is a member of the International Accreditation Forum (IAF) and with which ACR has a MoU in place. Project-specific conflicts of interest must be disclosed and mitigated.

ACR requires that all VVBs submit an application for ACR review and approval and a legal verifier attestation (<https://americancarbonregistry.org/carbon-accounting/verification/attestation-of-verification-body-2017.pdf>), which defines the VVB role and responsibilities, ensuring technical capabilities and no conflicts of interest. Validation and verification activities may not be conducted

<sup>8</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.



until the VVB has received approval from ACR. Once approved, it is the VVB's responsibility to update ACR immediately about any changes in accreditation status or scope, enforcement activities, investigations, revocations or suspensions of the body itself, or any verifiers working on the VVB's behalf.

*Section III, Part 3, Question 3.9. Safeguards system (referring to ACR's original application July 2019)*

Additionally, the annual ACR attestation required by ACR to be executed for all projects (found on the ACR website: (<https://americancarbonregistry.org/how-it-works/membership>)) includes the following attestations to environmental and community impacts of the project:

- (6) At no time during or since the development of the Project have there been any undisclosed or unmitigated adverse environmental or community impacts as a result of the development, construction, operation and/or maintenance of the Project;
- (7) Any comments that were received from stakeholders regarding environmental or community impacts during the development, construction, operation and/or maintenance of the Project have been addressed, and when necessary response actions have been implemented by the Member or Proponent and a true and accurate summary of any and all such communications/actions is attached hereto (as available).

*Section III, Part 3, Question 3.9. Safeguards system (referring to ACR's Material Change Form December 2020)*

ACR completed a 60-day stakeholder consultation to update its standard to version 7.0, which went into effect January 1, 2021. The new version of the Standard included the following material ICAO-relevant change:

- Transferring in section 6.E all annual attestation requirements to the same attestations (for regulatory compliance, ownership and community and environmental/social impacts of the project) in the project Monitoring Report. There is no longer an Annual Attestation form. These attestations can be found in the Monitoring Report Template posted on the ACR Registry: [https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/acr-monitoring-report-template\\_version-3.docx](https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/acr-monitoring-report-template_version-3.docx). This change was made to enhance reporting efficiencies by including the same attestations (no change in substance) in verified Monitoring Reports rather than as a separate process / annual document.

*Section III, Part 4, Question 4.8. Do no net harm (referring to ACR's original application July 2019)*

Projects registered on ACR must maintain material regulatory compliance. Regulatory compliance is defined by the ACR Standard as “*Adherence to all laws, regulations, and other legally binding mandates directly related to Project Activities.*” Per ACR Standard Chapter 3, Table 2 Eligibility Criteria:

Regulatory Compliance: *Projects must maintain material regulatory compliance. To do this, a regulatory body/bodies must deem that a project is not out of compliance at any point during a reporting period. Projects deemed to be out of compliance with regulatory requirements are not eligible to earn ERTs during the period of non-compliance. Regulatory compliance violations related to administrative processes (e.g., missed application or reporting deadlines) or for issues unrelated to integrity of the GHG emissions reductions shall be treated on a case-by-case basis and may not disqualify a project from ERT issuance. Project Proponents are required to provide a regulatory compliance attestation to a verification body at each verification. This attestation must disclose all violations or other instances of non-compliance with laws, regulations, or other legally binding mandates directly related to Project Activities.*

The Project Attestation can be found here: [https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/annual-project-attestation\\_2016.docx](https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/annual-project-attestation_2016.docx).

*Section III, Part 4, Question 4.8. Do no net harm (referring to ACR's Material Change Form December 2020)*

ACR has completed a 60-day stakeholder consultation to update its standard to version 7.0, which goes into effect January 1, 2021. The material ICAO-relevant changes that are now incorporated include converting in 6.E all annual attestation requirements to the same attestations (for regulatory compliance, ownership and community and environmental/social impacts of the project) to the project Monitoring Report.

The changes in attestation timing were to enhance reporting efficiencies by including the same attestations (no change in substance) in verified Monitoring Reports rather than as a separate process / annual document;

The changes are all reflected in the published ACR Standard v7.0:  
<https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

## **CHANGE 6**

a. Description of the change (e.g., the addition, modification, deletion undertaken):

While not a material change since this update is as a result of having followed ACR’s policies, procedures and approaches as previously described to the TAB and retaining the same requirements for impact assessment, mitigation and disclosure as in previous versions of the ACR Standard, ACR has updated the ACR Standard Chapter 8: Environmental and Social Impacts in version 8.0 to standardize reporting on impact assessment. ACR also updated the text of Chapter 3, Table 2 Eligibility Requirements. Accompanying the update to the Standard are new templates and a tool, now required for use by Project Proponents and submitted concurrent with the GHG Project Plan.

b. Rationale for the change:

This update provided greater specificity and standardization of the impact assessment, consultation, disclosure, and reporting processes.

c. Where the change is reflected in the Programme’s documentation or other resource(s)<sup>9</sup>:

The change is noted publicly in the ACR Standard available on the “Standards & Methodologies” webpage of ACR’s website: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>. The associated templates and tool are available on the “Guidance, Tools & Templates” webpage of ACR’s website: <https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates> (see Template for ACR Environmental and Social Impact Assessment Report, Template for ACR AFOLU Project SDG Contributions Report, Template for ACR Industrial Project SDG Contributions Report, and ACR SDG Contributions Reporting Tool).

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations

<sup>9</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

Previously submitted information would not be altered as a result of this update but more detail on the principles, scope, and process is now available.

*Section III, Part 3, Question 3.9. Do no net harm (referring to ACR's original application July 2019)*

ACR requires that projects adhere to environmental and community safeguards best practices to:

- Ensure that projects “do no harm” by maintaining compliance with local, national, and international laws and regulations;
- Identify environmental and community risks and impacts;
- Detail how negative environmental and community impacts will be avoided, reduced, mitigated, or compensated, and how mechanisms will be monitored, managed, and enforced;
- Ensure that the rights of affected communities and other stakeholders are recognized, and that they have been fully and effectively engaged and consulted; and
- Ensure that ongoing communications and grievance redress mechanisms are in place, and that affected communities will share in the project benefits.

Project documents submitted to ACR must include an assessment of environmental and social risks demonstrating that the impact is net positive. VVBs confirm this assertion at Validation and at each Verification for the duration of the project crediting period.

*Section III, Part 4, Question 4.8. Do no net harm (referring to ACR's original application July 2019)*

ACR's environmental and community safeguard requirements are described in Chapter 8 of the ACR Standard (<https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>) and further described in Section 2.9 of this application.

Per the ACR Standard Chapter 3, Table 2 Eligibility Requirements:

Environmental and Community Safeguards: *ACR requires that all projects develop and disclose an impact assessment to ensure compliance with environmental and community safeguards best practices. Environmental and community impacts should be net positive, and projects must “do no harm” in terms of violating local, national, or international laws or regulations.*

*Project Proponents must identify community and environmental impacts of their project(s). Projects may disclose positive contributions as aligned with applicable sustainable development goals. Projects must describe the safeguard measures in place to avoid, mitigate, or compensate for potential negative impacts, and how such measures will be monitored, managed, and enforced.*

*ACR does not require that a particular process or tool be used for the impact assessment as long as basic requirements defined by ACR are addressed. (See Chapter 8) ACR projects can follow internationally recognized approaches such as The World Bank Safeguard Policies, or can be combined with the Climate Community and Biodiversity Alliance (CCBA) Standard or the Social Carbon Standard for the assessment, monitoring, and reporting of environmental and community impacts.*

*Project Proponents shall disclose in their Annual Attestations any negative environmental or community impacts or claims thereof and the appropriate mitigation measure.*

*ACR reserves the right to refuse to list or issue credits to a project based on community or environmental impacts that have not or cannot be mitigated, or that present a significant risk of future negative environmental or community impacts.*

*Section III, Part 4, Question 4.8. Do no net harm (referring to ACR's original application July 2019)*

The public disclosure of the institutions, processes and procedures that are used to implement, monitor and enforce safeguards for environmental and social risks are included in Chapter 8 of the ACR Standard (<https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>) including:

#### *8.B Ongoing Disclosure and Enforcement*

*In their Annual Attestations to ACR, Project Proponents shall disclose any negative environmental or community impacts or claims of negative environmental and community impacts and the appropriate mitigation measure. ACR reserves the right to refuse to list or issue credits to a project based on community or environmental impacts that have not or cannot be mitigated, or that present a significant risk of future negative environmental or community impacts.*

In addition, to Project Proponents disclosing environment and community impacts and mitigation measures, VVBs are required to confirm assertions at Validation and at each Verification for the duration of the project crediting period. The Annual Attestation, which is required to continue crediting, is defined in the ACR Standard as “The statement that a Project Proponent provides annually to ACR relating to the continuance, ownership and community impacts of a project.”

*Section III, Part 4, Question 4.8. Do no net harm (referring to ACR's Material Update December 2020)*

ACR has completed a 60-day stakeholder consultation to update its standard to version 7.0, which goes into effect January 1, 2021. The material ICAO-relevant changes that are now incorporated include converting in 6.E all annual attestation requirements to the same attestations (for regulatory compliance, ownership and community and environmental/social impacts of the project) to the project Monitoring Report.

The changes in attestation timing were to enhance reporting efficiencies by including the same attestations (no change in substance) in verified Monitoring Reports rather than as a separate process / annual document.

The changes are all reflected in the published ACR Standard v7.0:

<https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

**CHANGE 7****a. Description of the change (e.g., the addition, modification, deletion undertaken):**

While not a material change since this update is as a result of having followed ACR's policies, procedures and approaches as previously described to the TAB, ACR has updated the ACR Standard version 8.0 to include processes that make more information available and documentation public, including introducing a public comment period for newly listed projects, requiring additional content in GHG Project Plans, requiring Monitoring Reports to be made public, and introducing a Renewed Crediting Period Listing Form.

**b. Rationale for the change:**

These updates enhance transparency of projects and the underlying attributes of credits, in line with market norms, and bring greater standardization to the project trajectory and reporting processes.

**c. Where the change is reflected in the Programme's documentation or other resource(s)<sup>10</sup>:**

The change is noted publicly in the ACR Standard available on the "Standards & Methodologies" webpage of ACR's website: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>.

**d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:**

Relevant references to the previously requirements and processes were included in the March 2022 Re-assessment Application, including:

*Section III, Part 4, Question 4.1. Are additional (referring to ACR's clarifications to TAB October 2019)*

If ACR accepts a verification statement, and the project has already completed all other required steps, then ACR will post the validation and verification reports, verification statement, and other public documentation to the ACR website (if applicable), and issue ERTs to the Project Proponent's account.

*Section III, Part 4, Question 4.2. Are based on a realistic and credible baseline (referring to ACR's original application July 2019)*

Per Section 6 of the ACR Standard, all projects developed in the ACR program have the following documents made public upon acceptance of a completed validation and verification of the project: the GHG project plan, monitoring report, validation report, verification report, and verification statement. The GHG project plan, validation report and verification report all disclose a project's baseline and any relevant assumptions related to the baseline and/or the application of the baseline in the project activity.

*Section III, Part 4, Question 4.3. Are quantified, monitored, reported, and verified (referring to ACR's original application July 2019)*

- c) Validation and verification reports are always publicly available at the "document" link for each project on the ACR Registry.

<sup>10</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

Per ACR Standard Chapter 6: *“Upon acceptance of the verification statement, ACR registers the project, posts public project documents, including the validation report, verification report and statement, and the validated GHG Project Plan, ...”*.

Per ACR Standard Chapter 6 – Section 6.A: *“Upon acceptance of the verification statement, ACR makes the validated GHG Project Plan, validation report, verification report, and statement public on its registry.”*

Per ACR Validation and Verification Chapter 7: *“The product of validation is a Validation Report, which is posted publicly by ACR.”*

Per ACR Validation and Verification Chapter 12: *“The end products of verification are a Verification Statement and Verification Report. ACR posts both publicly.”*

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

## **CHANGE 8**

a. Description of the change (e.g., the addition, modification, deletion undertaken):

While not a material change, ACR included the following minor clarifications in ACR Standard 8.0 Appendix B Avoiding Double Counting with ICAO’s CORSIA:

- Added to the Host Country Authorization template the option to restrict authorization to certain uses (such as for CORSIA) as well as the need to define “first transfer” in terms of when a Corresponding Adjustment will be applied for other international mitigation purposes upon [SPECIFY either upon: 1) authorization, 2) issuance, or 3) the use or cancellation of the mitigation outcome, as specified by the participating Party];
- Noted that as proof that a corresponding adjustment has been made, the option of allowing an irrevocable electronic certificate will apply only in cases in between UNFCCC reporting periods and only when a Host Country has a robust GHG accounting system with functionality, such as a distributed ledger registry technology, to enable reporting of this type of real-time, transparent, immutable, irrevocable transaction information. When adjustments are demonstrated by an entry in the Article 6 database or via an irrevocable electronic certificate, ACR requires that the information on the adjustment also be recorded in country reports to the UNFCCC in the next reporting period;
- Noted that as a compensation mechanism, any guarantee must be legally secure and binding, offered by a highly reputable third-party (i.e., a sovereign or corporate with a high grade or prime rating by Moody’s, S&P and/or Fitch) and include sufficient remedies to cover ACR’s costs for replacement units in the event of a default.

b. Rationale for the change:

In response to requests from the TAB for clarifications on these elements.



c. Where the change is reflected in the Programme’s documentation or other resource(s)<sup>11</sup>:

ACR Standard Appendix B: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

These clarifications would update information provided about requirements in Appendix B in response to Question 3.11 Avoidance of double counting, issuance and claiming as well as Question 4.7 Are only counted once towards a mitigation obligation.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

#### CHANGE 9

a. Description of the change (e.g., the addition, modification, deletion undertaken):

With regard to Question 4.6 “Assess and mitigate against potential increase in emissions elsewhere” in ACR’s reassessment application, ACR’s response – below - hasn’t changed:

*“Activity types that present potential risk of material emissions leakage in the ACR program include **Improved Forest Management** and Avoided Conversion of Grasslands, and to a lesser degree, Wetland Restoration, Afforestation/Reforestation, and Transition to Advanced Formulation Blowing Agents in Foam Manufacturing and Use. While it is generally acknowledged that land-based carbon offset sectors may be susceptible to leakage, this mere potential does not make susceptible project sectors unattractive. The inclusion of conservative measures to estimate and account for leakage ensures the integrity of emissions reductions resulting from an offset project. For the project types listed above, leakage mitigation is addressed in each methodology by requiring deductions of offset credits from each issuance. **Deductions range from 10% - 40% depending on the methodology, and in all cases, are deemed conservative and likely to over-compensate for leakage.**”*

Also unchanged is our response to any evidence of updates or changes since the Council’s approval, to which we responded: *“N/A except to note that **new methodologies and methodology updates continue in normal course of business and, as applicable, incorporate measures to account for leakage as described in our ICAO application.**”*

Therefore, while not a material change since this update is as a result of having followed ACR’s policies, procedures and approaches as previously described to the TAB and as described as new methodologies and updates in our normal course of business, we note that ACR has approved a new version of the Improved Forest Management (IFM) for Non-Federal U.S. Forestlands (version 2.0) as well as additional IFM methodologies that also include peer reviewed approaches to addressing the risk of leakage as described below.

<sup>11</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

Improved Forest Management (IFM) for Non-Federal U.S. Forestland v2.0: assesses leakage as follows:

- For market leakage: When baseline wood products exceed project by more than 5% but less than 25%, leakage deduction equals 10%. When project is aggregated or PDA consisting of small private landowners owning less than 5,000 forested acres, and baseline wood products exceed project by 25% or more, leakage deduction equals 20%. When baseline wood products exceed project by 25% or more, leakage deduction equals 30%.
- For activity shifting leakage: All projects must demonstrate sustainable forest management across ownership, or verifiable evidence of no harvesting for all lands owned or managed by participating entities.

Improved Forest Management (IFM) on Canadian Forestlands assesses leakage as follows:

- For market leakage: When baseline wood products exceed project wood products by 5-25%, leakage deduction equals 10%. When baseline wood products exceed project wood products >25% leakage deduction equals 40%.
- For activity shifting leakage: All projects must demonstrate sustainable forest management across ownership.

Improved Forest Management (IFM) on Small Non-Industrial Private Forestlands assesses leakage as follows:

- For market leakage: When baseline wood products exceed project wood products by more than 5% over the crediting period, leakage deduction equals 20%.
- For activity shifting leakage: All projects must demonstrate sustainable forest management, or verifiable evidence of no harvesting for all lands owned or managed by participating entities

b. Rationale for the change:

As cited above, there is no change to our response except to add new IFM methodologies and updates in the normal course of business, which incorporate measures to account for leakage as described in our ICAO application.

c. Where the change is reflected in the Programme's documentation or other resource(s)<sup>12</sup>:

The new and updated methodologies are posted publicly on the ACR website on the "Standards & Methodologies" webpage : <https://americancarbonregistry.org/carbon-accounting/standards-methodologies>

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:

See above in the response to a.

e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.

<sup>12</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

**CHANGE 10****a. Description of the change (e.g., the addition, modification, deletion undertaken):**

While not a material change since this update is as a result of having followed ACR's policies, procedures and approaches as previously described to the TAB, and retaining the same requirements for services, security, confidentiality, representations and warranties, etc. as in previous versions of the ACR Terms of Use, ACR has updated the ACR Terms of Use to align with the updates to the ACR Standard v8.0 and other operative documents and to incorporate ACR's new role as an approved Offset Project Registry for the State of Washington, new Registry infrastructure enhancements, and additional transparency measures. Among the updates were revisions to the third party ownership requirements previously addressed with the TAB.

**b. Rationale for the change:**

The July 2023 version of ACR Terms of Use introduced a new custodial account type that is eligible to hold, transfer and/or retire credits on behalf of Indirect Owners and therefore an exception to the general prohibition against third party ownership. This account type is intended for entities that operate an external exchange, trading platform, auction platform, or other marketplace for the purpose of clearing or otherwise facilitating transaction of ERTs. While introducing a new category of account type, ACR maintained previously explained policies such as requirements that the entity be a Regulated Person, have been authorization to act on behalf of the Indirect Owner, comply with applicable laws, regulations and other legally enforceable requirements, and maintains an auditable customer identification program or other traceability measures that ensure procedures to verify the identity of any individual(s) or organization(s) on whose behalf Account Holder is holding ERTs.

As part of the review of the Terms of Use, ACR determined that it was not practicable to require identity verification for simple third party retirements (when the Account Holder is retiring credits on behalf of a Third Party rather than holding or transacting credits on behalf of a Third Party), especially since these Account Holders may be retiring credits on behalf of individual members of the general public seeking to offset their personal emissions.

**c. Where the change is reflected in the Programme's documentation or other resource(s)<sup>13</sup>:**

The change is noted publicly in the ACR Terms of Use available on the "Open An Account" webpage of ACR's website: <https://americancarbonregistry.org/how-it-works/membership>.

**d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:**

Previously submitted information would not be altered as a result of this update but more detail on the principles, scope, and process is now available.

*Section III, Part 3, Question 3.5. Do no net harm (referring to ACR's original application July 2019)*

All ACR registry account holders must execute the legally-binding ACR Terms of Use (ToU) agreement prior to account approval (this agreement is publicly available here:

<https://americancarbonregistry.org/how-it-works/membership/acr-terms-of-use/acr-terms-of-use-june-2015.pdf>).

Section 6 of the ToU agreement outlines the ownership requirements (property aspects) for offset credits, summarized as follows.

<sup>13</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

**Ownership of offset credits:** A General Prohibition exists on Third Party Ownership of offset credits requiring Account Holder to hold or retire in its Accounts offset credits for which it is the sole holder of legal title. There are exceptions for retail aggregators, which may retire offset credits on behalf of third-parties under specific conditions, and for Account Holders that are Regulated Person(s) and have approval of third-party owners of offset credits to hold offset credits on their behalf. In the cases of the exceptions, Account Holder must comply with applicable laws, regulations and other legally enforceable requirements and agrees to maintain a customer identification program that contains reasonable procedures to verify the identity of any individual or organization on whose behalf Account Holder is holding offset credits.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application. We would be happy to answer any additional questions ICAO may have.