

Technical Advisory Body (TAB)

Public comments received
on the responses to the Call for Applications
for assessment by the TAB

September 2019

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Comment Set #1

Name:

Wayne Sharpe

Organization:

Global Environmental Markets and Carbon
Trade eXchange

Date of receipt:

13 August 2019

From: Wayne Sharpe <Wayne.Sharpe@gemglobal.com>
Sent: 13-Aug-19 04:22
To: Office of the Environment
Cc: Lee Barton
Subject: REDD.plus Programme Application
Attachments: TAB_Public_Comment_Form GEM CTX.docx

Importance: High

Please find attached my comments

Wayne Sharpe

CEO & Founder | GEM /CTX Group

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Skype: wayne.sharpe1

<https://gemglobal.com/>

<https://www.ctxglobal.com/>

<https://www.b-neutral.com/>

TAB Public Comment Template Form

The public is invited to submit comments on the responses to the call for applications, including regarding their alignment with the emissions units criteria (EUC).

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Commenter Name:

Wayne Sharpe

Commenter Organization:

Global Environmental Markets and Carbon Trade eXchange

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Example: ABC Program	Example: Section 3.9	Example: Safeguards System (paragraph 2.9)	
REDD.plus	Part 2	Overview	Kevin Conrad has a history of attempting to ‘pass off’ himself and his program as REDD+ when it is NOT. In 2017 he registered the trademark REDD+ despite being fully aware of the fact this was a UNFCCC acronym (and brand). The overview and application is full of half truths, misdirection and in some cases outright lies. Its a blatant attempt to baffle ICAO with deception and pass off. Again. https://redd-monitor.org/2017/11/09/kevin-conrad-federica-bietta-the-coalition-for-rainforest-nations-and-an-application-to-register-redd-as-a-trademark/
REDD.plus	Part 2	REDD plus (REDD+) under the UNFCCC	This entire section implies he created REDD+ (a statement he has made to me and others many times – verbally and in writing) and

			is endorsed by the UNFCCC. That's not the case
REDD.plus	Part 3	3.4 Identification and Tracking	In fact REDD.plus does not have a registry. The links are too the Markit environmental registry it manages itself. REDD.plus has never issued a Carbon credit of any kind- ever. In this section he states that Markit are connected to 'everything' but specifically exchanges. This is untrue. Their registry is not connected to any carbon exchanges and the head of it Kathy Benini has stated in writing she would never connect to Carbon Trade exchange – the reason is to support her highest revenue clients the OTC brokers. The clearance and settlement 'connections' they have are NOT electronic and not to banks/ organizations which most companies or airlines could or would connect too .
REDD.plus	Part 3	3.7 Program Governance	This is riddled with deception. Conrad has nothing to do with the procedure laid down by the UNFCCC which he has simply repeated. There is no evidence (actual) that he ever has or will comply with ANY process or any legal agreement. He runs the Coalition of Rainforest Nations (CfRN) but has NO obligation to follow any procedures.
REDD.plus	Part 3	3.11 Avoidance of double counting, issuance and claiming	Conrad ahs no experience and there is no evidence too support he could or would be capable of protecting the buyers from this risk. If he enters into a contract with Markit (I doubt he has actually done so yet) he will control the rules of his own Registry. My company GEM won the contract to build his new registry and he was unable to pay for it and insisted on his own rules and running his own processes. He refused any restrictive terms of following the UNFCC REDD+ procedures in our contracts/ license agreement or to withdraw his application for the REDD+ trademark.
REDD.plus	Section 4	4.1 – 4.6	this entire section is clever passing off and subterfuge. He has NO legal obligation to follow the UNFCCC procedures and there is no evidence he would do so. Unless ICAO could and would monitor and audit him regularly the risks are astronomical

REDD.plus	Entire Application	Parts 1 – 5	This application is riddled with deception – its real purpose being (in my opinion) to gain credibility with poor and developing nations to bring them into CfRN – which is run at Conrad’s discretion for his benefits. I would treat every statement of contractual engagement with complete skepticism based on direct experience

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Comment Set #2

Name:

Parke Wilde

Organization:

Tufts University

Date of receipt:

4 September 2019

From: Parke Wilde <parke.wilde@tufts.edu>
Sent: 4-Sep-19 21:27
To: Office of the Environment
Subject: Public Comments on CORSIA
Attachments: TAB_Public_Comment_Form_Wilde_v1.docx

Dear ICAO:

Here attached are my public comments on the first 5 of the 14 offset proposals (ordered alphabetically). Insufficient time was provided in the public comment period for me to read the remaining proposals.

The due date for comments is Sep. 5, and the first notice I can find announcing the open comment period, anywhere on the internet, is Sep 3. Because the ICAO website does not give an opening date for the comment period, and the ICAO Twitter feed does not contain any announcement of the comment period, I can find no evidence that this comment period was longer than 2 days. Clearly, this is not proper procedure.

Overall, the approach to additionality is not credible. Every sector of society is rapidly paying more attention to the climate crisis. Across the board, the baselines used in these proposals take insufficient account of future actions by external actors (outside of the offset scheme) that will simultaneously be seeking to affect emissions.

To give just one example, suppose an offset program funds fuel-efficient wood stoves to replace open cooking fires in a low-income country. The proposed “additionality” certification states that, in the absence of the offset program, households would continue to cook on open fires. The full emissions reduction from the change to new stoves is credited to the offset program as “additional.” But this is not plausible. In a time of climate crisis, countries around the world are rapidly expanding electrification, and the electric grid in turn is relying more on renewables. Rural people in low-income countries are moving by the millions to cities, where they are more likely to have electricity. To assume the households would all continue using cooking fires is not plausible. So the offset scheme gets credit for far more emissions reduction than was in fact achieved.

This problem is pervasive in the proposals I read today.

Here are my comments in the format of your official rubric, on just 5 proposals, but but my public comment greatly understates the deep emptiness of this offsets approach.

What really is needed from ICAO and CORSIA is actual emissions reductions within the aviation sector. It is a travesty that ICAO only provides overall goals for emissions “net” of offsets, and will not state goals for actual emissions reduction in the aviation sector.

Sincerely,

Parke Wilde

--

Parke Wilde

Professor

Friedman School of Nutrition Science and Policy, Tufts University

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Book and blog: www.usfoodpolicy.com

TAB Public Comment Template Form

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The public is requested to use this form to provide structured comments on the responses to the call for applications that were submitted for assessment by the TAB. Public comments regarding the information submitted may be published online, along with the commenter name and organization.

Commenter Name: Parke Wilde

Commenter Organization: Tufts University

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
American Carbon Registry	All sections	Transparency and public participation provisions (paragraph 2.8)	The .pdf is poor quality and not searchable. Key information appears to be blacked out.
American Carbon Registry	Section 4.1. Additionality.	Carbon offset programs must generate units that represent emissions reductions, avoidance, or removals that are additional (paragraph 3.1)	<p>The additionality section merely repeats standard explanations of additionality criteria at great length. It does not actually explain how the project will determine what would have happened in the absence of the offset activity.</p> <p>The examples of performance standards are insufficiently general and do not commit the project to any procedures or methods. The long list of offset programs and accompanying additionality method merely gives the name of the method and does not show any understanding of what the method actually entails.</p>
British Columbia Offset Program	Section 4.1. Additionality	Carbon offset programs must generate units that represent	The answers are nearly illegible and lack detail. The hyperlink is non-responsive. The critical question on procedures that provide “a reasonable assurance that the mitigation would not have occurred in the absence of the offset program” is not even

		emissions reductions, avoidance, or removals that are additional (paragraph 3.1)	answered.
China GHG Voluntary Emission Reduction Program	Section 4.1. Additionality	Carbon offset programs must generate units that represent emissions reductions, avoidance, or removals that are additional (paragraph 3.1)	<p>The proposal simply repeats boilerplate material, naming standard procedures for determining additionality, with no information about how this project will apply these procedures.</p> <p>The hyperlinks go to long documents in Mandarin and should be considered entirely non-responsive.</p> <p>No answer is provided to the critical final question about providing “a reasonable assurance that the mitigation would not have occurred in the absence of the offset program.” The proposal authors appear to have the mis-impression that this question applied only to projects declared “automatically additional.”</p>
Clean Development Mechanism	Section 4.1. Additionality	Carbon offset programs must generate units that represent emissions reductions, avoidance, or removals that are additional (paragraph 3.1)	<p>The application is merely a letter, not a proper application in the required format. It is impossible to determine from this submission whether the offsets will be additional. The CDM is the subject of a long literature, finding that these offsets are not additional. The words “additional” or “additionality” do not appear even once in the proposal. There is no evidence that the proposal even understands the issue. This application is entirely non-responsive to the requirements of paragraph 3.1.</p>
Climate Action Reserve	Section 4.1. Additionality	Carbon offset programs must generate units that	<p>The application provides no detail about additionality in the proposal document, beyond merely repeating the definition of the criterion.</p>

		<p>represent emissions reductions, avoidance, or removals that are additional (paragraph 3.1)</p>	<p>A hyperlink to a “program manual” goes to a website with approximately 5 documents named “program manual”, some in draft form, some in final form from various years, with no indication of which one is supposed to be binding for this proposal. The most recent of these documents lists two approaches to verifying additionality, without saying which one will be used. One of the two approaches is a “legal standards test,” which understates the level of independent public sector action (outside of the offset program) which may influence the baseline. In a time of increased public sector action on climate change, legal requirements are an insufficient basis for determining additionality.</p> <p>The box is checked “yes” indicating that some programs are automatically considered “additional,” but the accompanying explanation has no information about what criteria are used for determining that projects are automatically additional.</p> <p>The repeated claim that the reserve “employs standardized, rather than project-specific determinations of additionality” is unclear. Does this related to the assumption that some programs are “automatically” additional?</p>
<p>Forest Carbon Partnership Facility</p>	<p>Section 4.1. Additionality</p>	<p>Carbon offset programs must generate units that represent emissions</p>	<p>The proposal m....</p> <p>I have run out of time, because insufficient public notice was given for the open comment period. Working in alphabetical order through the 14 proposals, I had to stop here. As far as I know, the</p>

		reductions, avoidance, or removals that are additional (paragraph 3.1)	open comment period was from Sep 3 to Sep 5, 2019. I can find no public notice of the start of the open comment period earlier than Sep 3. Needless to say, this procedure for soliciting public comment is not proper.
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* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Comment Set #3

Name:

Clemens Plöchl

Organization:

Energy Changes

Date of receipt:

5 September 2019

From: Clemens Plöchl <clemens.ploechl@energy-changes.com>
Sent: 5-Sep-19 07:34
To: Office of the Environment
Subject: Programme Application

Dear Madam/Sir:

In response to your invitation for public comments in relation to applications of emissions unit programs we would like to emphasize the importance (in addition to the CORSIA EMISSIONS UNIT ELIGIBILITY CRITERIA) of considering programs which also create some positive regional impact and can incentivize projects from regions which have until now participate only to a low extent in GHG reduction activities.

Please note that we have not used the official form on your website as our IT system has not accepted the download of it.

Best regards!

Clemens Ploechl

Kennen Sie schon unsere Crowd-investing Plattform für Klimaschutzprojekte in Entwicklungsländern www.crowd4climate.org ?

Clemens Plöchl
Managing Partner

Energy Changes

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1020 Wien, FN 281804 v, Handelsgericht Wien

This message shall not constitute any obligations. This message is intended solely for the addressee.

If you have received this message in error, please inform us immediately and delete its contents

Comment Set #4

Name:

Gilles Dufrasne

Organization:

Carbon Market Watch

Date of receipt:

5 September 2019

From: Gilles Dufrasne <gilles.dufrasne@carbonmarketwatch.org>
Sent: 5-Sep-19 08:41
To: Office of the Environment
Cc: Sam Van Den Plas
Subject: Carbon Market Watch input to the public consultation on CORSIA programme applications
Attachments: TAB_Public_Comment_Form_CMW.docx

Dear Sir/Madam,

Please find attached Carbon Market Watch's reply to the public consultation launched by the ICAO CAEP Technical Advisory Body as part of the assessment process to determine eligibility of GHG programmes for CORSIA.

Please do not hesitate to contact me for any questions.

Best regards,
Gilles

--



Gilles Dufrasne

Policy Officer - Carbon Pricing

Carbon Market Watch

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Tel: +32 2 335 36 68/ Mobile: +32 491 91 60 70

Email: gilles.dufrasne@carbonmarketwatch.org

Web: www.carbonmarketwatch.org | [Newsletter subscription](#)

Twitter: [@carbonmrktwatch](https://twitter.com/@carbonmrktwatch)

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Commenter Name: Gilles Dufrasne

Commenter Organization: Carbon Market Watch

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Applicable to all programmes	Multiple sections	Multiple criteria	<p>Only programmes which meet all the <i>CORSIA Emissions Unit Eligibility Criteria</i> at the time of submitting their application form to the TAB should be eligible for use under CORSIA. Several programmes have communicated plans to modify existing rules, or to establish new policies, sometimes making this conditional on pre-approval of their program by the TAB. Yet, both the EUC and the Program application form are written in the present tense, suggesting that all criteria must be met at the time when the programme is assessed. There are no provisions in place to approve programmes on a preliminary basis, pending their compliance with certain criteria through future revisions. Such pre-approval would generate confusion on multiple levels, including the timing governing future revisions of programmes which would allow them to meet any outstanding conditions.</p> <p>For example, several programmes which do not currently have a functioning registry (e.g. FCPF, Nori, SFRP,...) have confirmed in section 3.4 that their registry “is” capable of meeting several requirements. This is logically impossible and this answer is based</p>

			on expectations of future developments. No program should be eligible for CORSIA without a clear guarantee that it meets the EUC in their entirety and at the time of approval.
Applicable to all programmes	Multiple sections	Multiple criteria	Programmes which have submitted incomplete applications should be invited to either complete the questions which have not been answered, or provide an explanation for why no answer was deemed necessary.
Applicable to all programmes	Sections 3.11 and 4.7	Avoidance of double counting, issuance, and claiming	No programme currently complies with this criteria , given the absence of an international agreement on the avoidance of double claiming inter alia for Emission Reductions (ERs) claimed under CORSIA and a country's Nationally Determined Contribution as communicated to the UNFCCC. In the absence of international guidance, it is impossible for a programme to ensure that double claiming will be avoided. Some programmes misinterpret the definition of double claiming, and assert that they can already avoid it. Others outline measures they have in place to avoid double claiming to the best of their abilities. We encourage all programmes to implement the Guidelines on Avoiding Double Counting for CORSIA , and we recommend that TAB members use these guidelines to evaluate programmes' progress towards successfully complying with the avoidance of double claiming requirements.
Clean Development Mechanism (CDM)	Multiple sections	Multiple criteria	If the CDM's eligibility for use under CORSIA is to be assessed, this must be done on a level-playing field with other programmes. Therefore, the CDM should not be assessed by TAB at the present time given that it has not completed and submitted an application form. For this reason, we have not included detailed comments about the CDM below, but we stress that, should it be assessed, the CDM fails to meet several of the EUC, including Program Design Elements number 9, 10, and 11.
MyClimate	Multiple sections	Multiple criteria	As stated in its application form, MyClimate does not establish its

			own methodologies but rather uses those developed by other established programs. From MyClimate’s website, it appears clearly that MyClimate is not a GHG programme , but rather develops projects and sells ER units. MyClimate should therefore not be assessed by TAB.
REDD.plus	Multiple sections	Multiple criteria	REDD.plus is not a GHG programme and therefore should not be assessed by TAB. The application form communicated by REDD.plus is incomplete and lacking sufficient information to confirm that it can carry out the essential activities of a GHG programme. For example, there is no clear information relating to the development of methodologies (only international agreements are referenced, with no further details), it is unclear how the validation and verification process would work and whether any independent third party would be involved. There are no details regarding the governance of the “programme”. Finally the sections relating to Programme Design Elements 8 (transparency), 9 (safeguards), and 10 (sustainable development) are answered to a large extent with the same text, which lists objectives rather than describing mechanisms and concrete measures to attain the objectives.
Chinese GHG Voluntary Emission Reduction Programme (CCER)	Multiple Sections	Multiple Criteria	Most references and documentations provided by CCER are only in Chinese and it is therefore difficult to assess the programme’s compliance with the EUC. TAB should invite CCER to submit translated documentation to support its application, as stated in the introduction of the application form.
The State Forests of the Republic of Poland (SFRP)	Section 4.5	Eligibility Criterion (EC) 5	SFRP does not sufficiently address the risk of non-permanence of the emissions reductions it would sell. While no further details are provided in the application form, it states on its website that the “general effects” of the projects are estimated to last for 30 years. The application form also includes a reference to a “reserve” and mentions that the programme can cope with reversals but does

			not provide any details. The information provided is not sufficient for this program to meet this specific criteria.
The State Forests of the Republic of Poland (SFRP)	Section 4.6	EC 6	SFRP does not provide information to demonstrate that it is capable of avoiding material leakage, including through indirect land-use change. No answers are provided in section 4.6 of the application form.
The State Forests of the Republic of Poland	Section 3.6	Program Design Element (PDE) 6	SFRP does not currently use the services of validation and verification bodies, but states it would do so in the future (see comment above relating to the problematic of assessing programmes based on plans and projections). It further suggests that it could hire the services of Gold Standard or Verra, themselves GHG programmes, to perform such tasks. It is unclear how this would work if SFRP claims to be an independent programme.
The State Forests of the Republic of Poland	Section 3.9	PDE 9	SFRP claims that environmental risks “is not an issue” and that social impacts can only be positive (through increased employment). This is incorrect and specific safeguards should be adopted for each type of risk. This criteria is not met.
The State Forests of the Republic of Poland	Section 3.10	PDE 10	SFRP states in its application that all its projects contribute towards SDG13: Climate Action. This is insufficient to satisfy the criteria in PDE 10 which requires that programmes have systems in place to report on <i>co-benefits</i> of projects, i.e. benefits other than emission reductions.
The State Forests of the Republic of Poland	Section 3.11	PDE 11	SFRP only discusses the risk of double issuance; with few details, and does not address the risk of double claiming. Poland’s forest sector is subject to a specific target set at European level through the LULUCF regulation as well as existing flexibilities adopted in the European Climate Action Regulation, which require the country to maintain its emissions from the forestry sector to a specific level. Any ERs sold to CORSIA from the Polish forestry sector would be double counted by both airlines and Poland, unless specific

			accounting measures are applied by Poland
Nori	Section 4.5	EC 5	Nori does not have measures in place to ensure permanence over a sufficient time horizon. Emission Removals achieved under the program are guaranteed for only 10 years, which is far below the 100-year benchmark value used by other programmes.
Nori	Section 3.9	PDE 9	Nori does not have any specific safeguards in place. It merely requires that projects comply with local laws and regulations, and asserts that transparency is the best safeguard to avoid adverse impacts. While transparency is important, it is not a substitute for specific safeguards, both social and environmental, as transparency can only help uncover adverse impacts ex-post, and assumes close monitoring by the public.
Nori	Section 3.10	PDE 10	Nori states in its application form that each methodology <i>should</i> support SDGs, but SDGs are not referenced anywhere in the foundational document “How Nori works”. The only methodology available does mention SDG benefits, but this is not a policy clearly stated in any document.
Nori	Section 4.1	EC 1	Nori will allow the issuance of units for Emission removals which occur physically in 2019 (or later), for projects which could have started as early as 2010. It also foresees allowing crediting “CO2 drawdown” which physically happened up to 5 years before 2019, as a way to reward the first project developers who choose to participate in the programme. This raises serious concerns regarding the additionality of projects. A project cannot be additional if it started at a point in time when the program did not exist (e.g. in 2010), since it could not have foreseen the possibility of generating revenues through Nori at its inception. We encourage TAB, in its assessment of programmes, to recommend a vintage restriction on the eligibility of programmes. Any such restriction should be based on project start date (or investment decision).

BC Offset programme (BCO)	Section 3.9	PDE 9	BCO does not have environmental and social safeguards in place to satisfy PDE 9. The answer to section 3.9 refers to a section in the programme’s documentation which deals with “a material impairment of the project reduction”. This section relates to the quantity of ERs which are credited and sold as units Vs. the actual ERs which are achieved over time. It does not deal with environmental nor social issues. The words “environment”, “social”, or “safeguard” do not appear anywhere in the document referenced.
BC Offset programme	Section 3.10	PDE 10	BCO does not properly address section 3.10 and provides a link to a webpage about “developing emissions offset projects”. This page does not mention sustainable development. Neither of the two legislative documents referred to in the application form as the foundational documents for the programme include the words “sustainable” or “co-benefit”.
Global Carbon Trust (GCT)	Section 3.1	PDE 1	GCT states that methodologies from other programmes can be used under its standard, as well as new methodologies developed by GCT. In the absence of any existing projects or own methodologies, it is difficult to assess how this will work. In particular, there is no information related to how GCT will select between projects which are CORSIA eligible and those which are not. For example, should GCT be eligible for CORSIA, then a project registered under GCT, but using a methodology from another programme which is not eligible under CORSIA, should not be eligible. Further clarifications are necessary before GCT’s eligibility can be assessed.
Global Carbon Trust	Section 3.9 and 4.8	PDE 9	GCT does not have sufficient safeguards in place in its main standard. In section 3.9, GCT discusses an extra, voluntary, standard (the “Environmental and Social Safeguards Standard”) which does have safeguards but which project developers are not obliged to comply with. In its answer to section 4.8, paragraph c,

			GCT states that complying with this additional standard will be mandatory for projects which are to be eligible under CORSIA. However, this is not stated in section 3.9 (which relates to the exact same topic). In addition, this constitutes a future plan which is not a sufficient basis for eligibility. Currently, safeguards, as well as the “no net-harm” principle, are only operationalized through a voluntary, additional standard.
Global Carbon Trust	Section 3.10	PDE 10	Similar to the comment above, GCT only states that it will operationalize the SD criteria by requiring that CORSIA-eligible projects also comply with its additional safeguards standard. This constitutes a future plan, and it is unclear how GCT as a whole could be recognized as eligible when it can only meet the EUC if several of its standards are combined, and when there is currently no measure in place requiring such combination.

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programmes](#)

Comment Set #5

Name:

Maggie Comstock

Organization:

Conservation International

Date of receipt:

5 September 2019

From: Mariela Perrone <mperrone@conservation.org>
Sent: 5-Sep-19 09:30
To: Office of the Environment
Cc: Maggie Comstock; Lina Barrera
Subject: Public Comment on ICAO Emissions Unit Program Review
Attachments: Public Comment on ICAO Emissions Units Criteria Program Review.pdf

Dear members of the Technical Advisory Board,

Enclosed please find Conservation International's Public Comment on ICAO Emissions Unit Program Review. Please note that Maggie Comstock is Conservation International's contact for the purpose of this submission. You can find her contact information below:

Maggie Comstock
Senior Director, Climate Policy
mcomstock@conservation.org
+1 202-834-0030

Best Regards,

Mariela Perrone Reed
Manager, Conservation Incentives Policy
Conservation International



PUBLIC COMMENT ON ICAO EMISSIONS UNIT PROGRAM REVIEW

EXECUTIVE SUMMARY

If the aviation sector were a country, it would be one of the top 10 emitters of carbon dioxide on Earth. To help deliver its promise of carbon-neutral growth from 2020, international aviation is looking, in part, to carbon offsets. CORSIA (Carbon Offsetting and Reductions Scheme for International Aviation) could become the largest market for offsets in the world, generating demand for up to 3 billion metric tons of emission reductions over CORSIA's 15-year span.

The cap on emissions at 2020 levels agreed by ICAO member states is a significant achievement for international aviation and for the climate. We recognize the enormous work, both technical and political, that has gone into CORSIA to date. Fourteen offset credit programs have applied for CORSIA eligibility in the first round. The applications showed a range of thoughtful responses to the Emissions Unit Criteria (EUCs). It's also notable that all but two of the programs included methodologies for natural climate solutions, which can offer at least 30% of the mitigation needed globally but currently receive less than 2% of the investment. Several program applications included methodologies for reducing emissions from the forest sector, which has the largest mitigation potential of the natural climate solutions.

Key Program Comments

We reviewed all program applications and have commented below on those that include or otherwise address forests or other nature-based activities. Several of the programs demonstrated technically sophisticated, and advanced programmatic design, as well as including elements aimed at ensuring high offset integrity. Our assessment is that the following programs have undertaken extensive efforts to design their programs and include elements to ensure offset integrity; they also have a base of experience implementing those elements: Verra, The Gold Standard, Climate Action Reserve, American Carbon Registry, and British Columbia Offset Program.

However, in some cases, responses represented aspirational or planned elements to meet the Emissions Unit Criteria, instead of already-implemented elements. For example, the Forest Carbon Partnership Facility plans to have a registry in place by the end of this year, but does not currently have one. The Thailand program would need to clarify key elements including policies to address double claiming, as indicated below. If these, or any, programs submit significant revisions to their applications to address these elements, the revised applications should be re-posted for public review and comment.

We have significant concerns about the remaining programs, which would, as detailed below, require substantial strengthening to their programmatic design in order to meet the EUCs established by ICAO. We recommend that these programs address key programmatic and offset

integrity elements and apply again in a later application period: The Carbon Forest Program (Poland), Global Carbon Trust, Nori, REDD.plus, CCER, and myclimate. Finally, we were **not able to review** the Clean Development Mechanism, as the program did not submit a complete application. We recommend against any recommendation or decision on this program until further details are provided and made available for public comment.

We would like to reiterate our support for the EUC review process, and thank the Technical Advisory Board (TAB) for their work in ensuring CORSIA only allows high-integrity offsets into the soon-to-be world's largest offset market.

Reflections on Greenhouse Gas Program Applications

This public comment period represents a significant and positive step towards the operationalization of CORSIA. There is great interest and commitment from civil society and across the private sector, non-profit organizations, and governments to see CORSIA's promise fully realized, with environmental integrity. While the fourteen emissions unit programs that applied represent years of combined experience, each includes distinct governance and implementation mechanisms, not all of which appear to meet the EUC. Our review of these approaches is further explained below.

It is also important to address some misleading statements about Reducing Emissions from Deforestation and forest Degradation, and sustainable management of forests, conservation of forest carbon stocks and enhancement of forest carbon stocks (collectively referred to as REDD+). REDD+ is a framework developed under the United Nations Framework Convention on Climate Change (UNFCCC) to address deforestation by supporting the protection of forests for their carbon sequestration, storage and other services. One application, put forward under the name of "REDD.plus," claims that:

...any forestry units generated under voluntary standards, such as the World Bank's FCPF, VCS, GS, CAR, ACR, Plan Vivo, etc. are not REDD+ by definition as they do not fulfill the necessary requirements outlined within relevant UNFCCC decisions.

REDD+ activities must follow UNFCCC guidance adopted by the Conference of the Parties to the UNFCCC. This guidance is called The Warsaw Framework for REDD+. Therefore, any activity that meets the Warsaw Framework requirements is REDD+, by definition. Of the programs that have applied, the World Bank's Forest Carbon Partnership Facility (FCPF) and the Verra VCS Jurisdictional and Nested REDD+ Program (JNR), among others, require all REDD+ emission reduction units in their programs to be consistent with the Warsaw Framework. For example, to ensure that all the emission reduction units for which they seek CORSIA eligibility are compatible with the Warsaw Framework, Verra excluded from its application methodologies for standalone¹ REDD+ projects. Other applicant programs are taking similar steps.

We have analyzed each of the fourteen program applications for their technical merit in fulfilling the EUCs. In the sections below, we highlight specific concerns and positive aspects of the different

¹ Standalone REDD+ projects are local level REDD+ activities that are not linked to a country's national REDD+ strategy or other elements of the Warsaw Framework for REDD+. Site-scale REDD+ activities can be implemented in line with the Warsaw Framework for REDD+ if they are "nested" or integrated into the national or subnational REDD+ program.

program approaches to specific EUCs, including those relating to program governance, additionality, leakage, and more.

We would also like to note that this review is done on a program basis, not an activity basis. These comments are not a reflection on REDD+ as a mitigation activity, as we have already conducted technical analysis on the potential eligibility of REDD+ and concluded that well-designed [REDD+ programs can meet the EUCs](#).

Incomplete or Unfinished Programmatic Design or Offset Integrity Elements, EUCs 3.1 - 4.8

Several programs have submitted applications that include incomplete or unfinalized program design and offset integrity elements. One cannot review the environmental integrity of these programs, as nothing substantive has been submitted. These programs, if approved, represent a high-risk to public trust in CORSIA and a high-risk to the integrity of CORSIA itself. We do not recommend the TAB approve any programs where the program design elements remain unfinished during the TAB review. Instead, we recommend that these programs apply again at a later time, once these design elements have been finalized.

In some cases, the program states that some design or offset integrity elements will be completed within this TAB review period. If that is the case, we call for another public comment period to allow for an additional review of those newly-added elements. These elements, which were checked as finalized on the application, but later included explanatory text to the contrary, include:

- Programs with incomplete peer-review methodologies;
- Programs without registries;
- Programs without on-the-ground projects or programs that have issued offsets; and
- Programs without permanence or leakage plans for specific methodologies.

As a specific example, Global Carbon Trust (GCT) mentioned that it plans to develop a carbon capture and storage methodology but has “not taken decision on how the potential reversal will be addressed.” This is a clear example of something that should already be developed before the TAB approves such a program. It is difficult to evaluate the approach to permanence within this methodology without such text already being made public. We would recommend that the TAB does not approve this or other proposed new methodologies submitted after the initial application to the TAB; rather, GCT and other programs in a similar position, should reapply for consideration by the TAB once these methodologies have been finalized.

The application for the Carbon Forest Program (Poland) is also incomplete and does not currently meet some of the EUCs. The proponent claims that the program is based on a pilot project that started in 2017 and that, if the program were approved, it will ensure compliance with CORSIA’s guidance on reversals, transparency, public participation and double issuance, use and selling -- but does not provide any timelines for accomplishing these crucial elements. Thus, this assertion provides only weak assurance and no evidence that the program would actually meet the criteria in the future.

Finally, *all* programs had uncertain double claiming policies, as these rules depend largely on the outcomes of the Article 6 negotiations. We would like to see the TAB address this comprehensively; or allow another review period for double claiming only, once the Article 6 decisions have been finalized.

Authority Over Programmatic Design and/or Offset Integrity Elements, EUCs 3.1- 4.8

Several programs seemed to submit applications on behalf of other programs that operate within the UNFCCC negotiating space, the voluntary, and/or the compliance markets. This raises both a concern and recommendation: the TAB should only review programs that have authority to make key programmatic design and offset integrity decisions.

For example, myclimate refers a majority of questions around program design and offset integrity to the programmatic rules developed by the CDM, Plan Vivo, the Gold Standard, and the Federal Office of the Environment of Switzerland. Myclimate does not appear to have authority over any future design or integrity decisions within those programs and makes no reference to having a mechanism in place to develop its own policies when needed.

Similarly, the REDD.plus program refers extensively to the UNFCCC decisions in the description of its programmatic and offset integrity design. However, as a private sector Limited Liability Corporation (LLC), the program is a separate entity from the UNFCCC and has no agency over that process, including any future decisions about REDD+. The program makes no reference to having a mechanism in place to develop its own policies when needed and does not provide evidence of any staffing structure (such as a board, CEO or president, or other staff) who would undertake such policy development.

GOVERNANCE, EUC 3.7

Despite the fact that there is an explicit requirement that each program must have been continuously governed and operational for at least the last two years, there are several programs that do not meet this criterion.

In particular, the TAB should take a closer look at the governance details of the REDD.plus submission. For REDD.Plus, it appears that the LLC that is registered for this program was only created in 2019. Similarly, there does not appear to be a board, president or any staff, which puts the governance of the program into question; nor is there a clear plan for what might happen if the REDD.plus program ends (the program only refers to the UNFCCC decisions around REDD+, which are separate from the REDD.plus LLC).

In contrast, other programs have been operational for much longer than two years, and have not only established program governance and other EUC elements, but also a wealth of useful experience in updating and refining these criteria over time. These programs include: Winrock International's ACR (since 1996), CAR (since 2001), the Gold Standard (since 2003), CDM (since 2006), Verra (since 2006), and FCPF (since 2007).

DO NO HARM AND SAFEGUARDS, EUC 3.9, 4.8

All REDD+ programs must follow local laws and regulations as well as guidelines under the UN Framework Convention on Climate Change, including the REDD+ Cancun Safeguards.² These globally-agreed REDD+ safeguards require:

- a) That actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements;

² UNFCCC. (2010) FCCC/CP/2010/7/Add.1 Appendix I: "Guidance and safeguards for policy approaches and positive incentives on issues relating to reducing emissions from deforestation and forest degradation in developing countries; and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries." <https://unfccc.int/resource/docs/2010/cop16/eng/07a01.pdf#page=12>.

- b) Transparent and effective national forest governance structures, taking into account national legislation and sovereignty;
- c) Respect for the knowledge and rights of indigenous peoples and members of local communities;
- d) The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities;
- e) That actions are consistent with the conservation of natural forests and biological diversity, ensuring that actions are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits;
- f) Actions to address the risks of reversals; and
- g) Actions to reduce displacement of emissions.

Greenhouse gas programs that include REDD+ activities, such as the FCPF, Verra’s VCS JNR and REDD.plus, all require safeguard implementation in line with these safeguards agreed in UN decisions in Cancun.

Further, FCPF requires additional safeguard operational rules and regulations from the World Bank. Both Verra’s VCS JNR and FCPF require that REDD+ programs include grievance redress mechanisms for any individuals or communities who feel their rights have been violated. Finally, both these programs require that the REDD+ program must report on the implementation of their safeguards against rights violations in order to receive credit for reduced deforestation results.

SUSTAINABLE DEVELOPMENT, EUC 3.10

In addition to delivering high-quality emission reductions, REDD+ and other natural climate solutions also provide significant environmental co-benefits—such as improved soil quality, cleaner air and water, higher coastal resilience and biodiversity conservation—and social co-benefits for a myriad of stakeholders, including indigenous peoples and local communities. These can include strengthened recognition and respect for customary land and resource tenure rights as well as support to rural smallholders with transition to more sustainable and productive agricultural practices. Each REDD+ initiative that successfully reduces deforestation and delivers emissions reductions is designed to address locally-specific drivers of deforestation in a manner that ensures local livelihoods are maintained and enhanced. By helping to maintain natural habitats and ecosystem services at scale, as well as providing sustainable and diversified livelihoods, REDD+ initiatives are also uniquely positioned to support adaptation to climate change.

The greenhouse gas programs that include REDD+ activities – including FCPF and Verra’s VCS JNR – require that the Cancun Safeguards are addressed and respected, ensuring that REDD+ actions enhance other social and environmental benefits. They also require that information must be provided on how this has been achieved, with FCPF additionally calling for monitoring and reporting of co-benefits, thereby demonstrating and detailing the contributions made to sustainable development.

ADDITIONALITY, EUC 4.1

Additionality is a key component of credible carbon offsets. All programs must include strong additionality criteria. Programs typically ensure additionality by requiring projects to meet an additionality test. Common additionality tests include a legal or regulatory test (to ensure project activities are not already required by law); a financial test (to ensure the activity would not be profitable without carbon offset revenue); a barriers test (to ensure the activity would not happen due to other

non-financial barriers); and the common practice test (to ensure the activities differ from other commonly-used practices).

Most of the programs appear to have adequate additionality requirements. The American Carbon Registry, for example, has procedures in place to ensure that projects demonstrate additionality. The validation and verification bodies evaluate each project's additionality assessment to ensure that all claimed emission reductions are indeed surplus to "business as usual." All ACR projects must either: exceed an approved performance standard and a regulatory additionality test, or pass a three-pronged additionality test. If a project is found to be non-additional after offset credits are issued, then the project would be required to compensate for any over-issuance.

The REDD+ methodologies advanced by Verra, FCPF, REDD.plus also meet these criteria, as the baselines are developed in line with rigorous UN guidance that considers historical deforestation rates and business-as-usual projections from which to measure results and demonstrate additionality. All countries engaging REDD+ must also develop a national REDD+ strategy and action plan to communicate their approach for implementing REDD+ and delivering results. This national strategy considers the country's national context and identifies the drivers of deforestation that would have led to an increase in emissions if the REDD+ activities had not occurred.

PERMANENCE, EUC 4.5

Many programs acknowledge that permanence can be a concern for all sectors and provide additional requirements to mitigate potential reversal risks of terrestrial sequestration projects and carbon capture and storage projects. Some programs, including the Thailand Greenhouse Gas Management Organization and British Columbia Offset Program, chose to exclude forest-related methodologies, such as "Deforestation and forest degradation and enhancing carbon sequestration in forest area project level," citing that these project scale activities "present a potential risk of reversal of emission reductions." Similarly, Verra excluded methodologies for standalone REDD+ projects from their application to ensure that all of their eligible units are compatible with the Warsaw Framework.

GCT states that it plans to develop a carbon capture and storage methodology, but it has "not taken decision on how the potential reversal will be addressed." We would like to be able to review these GCT's plans before this program is considered for CORSIA.

In contrast, Verra, for example, requires an assessment of the potential risk of reversal of emission reductions, avoidance, or carbon sequestration. These findings are used to calculate the contribution of each project, nested VCS REDD+ project and/or VCS JNR program to a respective pooled buffer account. The jurisdictional pooled buffer account holds non-tradable buffer credits to cover the risk of reversal associated with JNR programs and nested REDD+ projects.

All national and subnational REDD+ programs are required to address potential risk of reversals under the REDD+ Cancun Safeguards adopted under the UN. The scale of REDD+ implementation, in line with national strategies, promotes long-term sustainability and permanence of REDD+ emission reductions. REDD+ programs have years of experience and guidance on mitigation measures to address any potential risk of reversals. For example, some REDD+ programs, including the FCPF and Verra, employ a buffer system (i.e., reserves of reductions which are not transferred but which can be accessed to compensate for any reversals).

Other programs that include activities in Agriculture, Forestry and other Land Uses (AFOLU) that are not REDD+ also include adequate procedures to ensure permanence. The American Carbon Registry, for example, mitigates reversal risks through legally binding AFOLU Carbon Project Reversal Risk

Mitigation Agreements and Buffer Pool Terms and Conditions. The Agreement outlines requirements to: assess risk, mitigate risk through the ACR mechanism, comply with risk mitigation requirements, and compensate for reversals as applicable. These buffer pool and risk mitigation procedures allow ACR to demonstrate that permanence provisions can fully compensate for the reversal of emission units used under CORSIA. The Gold Standard and the Climate Action Reserve also utilize buffer pools to ensure permanence in this way.

LEAKAGE, EUC 4.6

The UNFCCC Warsaw Framework safeguards against leakage by requiring the establishment of a national forest monitoring system and the preparation of national REDD+ strategies and action plans that address the drivers of deforestation and forest degradation, land tenure and forest governance issues, as well as reversals at the national or subnational scale.

By implementing REDD+ at the national scale, countries are required to address the drivers of deforestation and to adopt policies and regulations to ensure inter alia that there is no potential increase in emissions within the country. Further, as correctly outlined in the REDD.plus application, the UNFCCC REDD+ Framework also “requires national-scale reporting, GHG Inventories, and Forest (Emission) Reference Levels.”

Leakage from non-REDD+ agriculture, forest, and other land-use (AFOLU) activities can also be addressed at a site-specific level. For example, VCS submitted its REDD+ and Improved Forest Management methodologies as part of its JNR program; however, it also submitted stand-alone activities under its Afforestation, Reforestation and Revegetation (ARR), Agricultural Land Management (ALM), Avoided Conversion of Grasslands and Shrublands (ACoGS), and Wetlands Restoration and Conservation (WRC) methodologies. For those methodologies, the projects must address the risk of emissions leakage, market leakage, ecological leakage and activity-shifting leakage. The program includes a requirement to monitor leakage, as part of the monitoring plans for all projects for which there is a potential risk.

IMPORTANCE OF ENSURING NO DOUBLE COUNTING OR CLAIMING OF UNITS, EUC 4.7

Double Counting

In 2015, countries under the United Nations climate negotiations adopted the Paris Agreement, agreeing to limit global temperature rise to well below 2° Celsius and to increase resilience to climate change. Each country has put forward their proposals for meeting these global goals in their nationally determined contributions (NDCs). Consequently, all emissions reductions proposed for emissions trading with other countries or airlines under CORSIA must be recognized by the national government and transparently accounted for in order to ensure the avoidance of double counting. CORSIA requires programs to have provisions to ensure that emission reductions are only counted once towards a mitigation obligation, which is applicable to all sectors and offset types.

In line with the EUCs, all greenhouse gas programs must have a functioning registry for tracking emission reductions issued and claimed in order to ensure the avoidance of double counting. However, REDD+ activities must meet an additional requirement across all programs: UNFCCC decisions require that REDD+ results be recorded in the Lima REDD+ Information Hub. This provides a mechanism to ensure that all REDD+ results, including those transferred to CORSIA, can be identified and tracked against national progress under the Paris Agreement.

Utilizing an additional registry to track emission reductions as they are generated and claimed is compatible with the Warsaw Framework for REDD+. For example, REDD.plus utilizes IHS Markit as their registry administrator, but falsely claims that the registry systems of other greenhouse gas programs are insufficient:

“Thus, unless such [voluntary standards, such as the World Bank’s FCPF, VCS, GS, CAR, ACR, Plan Vivo, etc.] units have been canceled and exchanged for REDD.plus results units (RRUs) under REDD.plus they will effectively be double counted and fail to meet CORSIA environmental safeguards.”

REDD+ units generated under other programs will not “effectively be double counted.” Just like any other offset program, REDD+ units delivered under specific greenhouse gas program standards, including FCPF and Verra’s VCS JNR, must be transparently recorded in a registry and be subject to additional provisions to ensure no double claiming of emission reductions, including double issuance, use or selling.

For example, the Verra’s VCS Program also requires projects (from “nested” REDD+ or other sectors) or JNR programs to provide evidence that the emission reductions or removals have not and will not otherwise be claimed under a greenhouse gas program or mechanism. REDD+ units included in VCS’s application are assigned serial numbers, recorded in their project database and registry, subject to automatic check and periodically screened for discrepancies or duplication.

Double Claiming

All greenhouse gas programs should develop and institute updated rules to ensure no double claiming of emission reductions post-2020 in the context of the Paris Agreement and countries’ NDCs. Double claiming is extremely problematic, as it creates the illusion that we are getting twice as many emission reductions as we actually achieve.

The EUCs and Appendix A to the CORSIA application are clear: Programs should provide attestations from governments indicating that the underlying mitigation “is not also counted toward national target(s) / pledge(s) / mitigation contributions / mitigation commitments.”

Verra, the Gold Standard, ACR, CAR and GCT all note their willingness to do so in their applications and provide specific examples of how they intend to begin addressing this risk (in many cases, noting that final approaches will depend on the outcome of the Article 6 negotiations).

The GCT, for example, has discussed a letter of attestation with the government of Qatar. It also recommended ICAO hold capacity-building workshops with CORSIA-signatory countries and airlines to address double claiming and accounting issues, which we would also support.

The Gold Standard, CAR, and ACR all claimed to be working towards alignment with the [Guidelines on Avoiding Double Counting for CORSIA](http://www.adc-wg.org) (www.adc-wg.org). It should be noted that the civil society participants in the working group that developed the guidelines are of the view that to maintain integrity, host countries need to make corresponding adjustments when authorizing the use, for CORSIA, of credits issued for emissions reductions and removals whether those originate inside or outside the scope of NDC. This view is summarized in the executive summary of the guidelines. Gold Standard and CAR estimate their procedures will be made public by December 2019. CAR also mentioned it will develop a new website with CORSIA-specific information, including guidelines about procuring a Letter of Authorization and other key elements to address the risk of double claiming. Verra did not reference

specific rules, but mentioned it is willing to update its current rules to address double claiming risks to better address those challenges post-2020.

Conversely, several submissions did not provide evidence of any relevant policies and procedures to ensure credits are only claimed once towards a mitigation obligation. This includes Nori, myclimate, British Columbia Offset Program, and The Carbon Forest Program (Poland). Thailand's T-VER mentions that it expects to have policies in place to avoid double claiming by the end of 2019, but does not provide specific examples or text for this. Similarly, the FCPF mentions that its section 6.2 provides "transparency" that there is no double claiming of the emissions reductions, but does not specify how it will ensure no double claiming.

The CCER program application raises a further double-counting concern. It appears that the majority of the CCER program methodologies are also CDM methodologies. It is possible that the CCER program could be issuing credits for the same projects and same reductions that have already been certified by the CDM. The CCER program application should be strengthened by providing clear, independently verifiable information that such double-issuance (and double-cancellation) has not occurred, and should describe the steps the program is taking to ensure that these do not occur in the future.

CONCLUSION

If the aviation sector were a country, it would be one of the top 10 emitters of carbon dioxide on Earth. To help deliver its promise of carbon-neutral growth from 2020, international aviation will have to look, in part, to carbon offsets. Experts estimate that nearly three fourths of the anticipated increase in international aviation emissions above 2020 levels could be covered by the market-based measure, CORSIA.³ This could generate demand for up to 3 billion metric tons of carbon credits over CORSIA'S 15-year span.

With such demand, it is unsurprising that many programs seek to transition their carbon offsets into CORSIA. However, while many of the 14 applications have plans to address CORSIA's EUCs, not all have implemented them. Based on our review of these programs, we would recommend that the TAB take careful note of the relatively technically sophisticated and advanced programmatic design and offset integrity elements, as well as the base of experience put forward by Verra, The Gold Standard, Climate Action Reserve, American Carbon Registry, and British Columbia Offset Program, and request that these programs supplement their applications with greater detail on how they plan to assure, through attestations, that their units are not also being counted by host countries.

We would recommend the TAB request the Forest Carbon Partnership Facility and the Thailand program to supplement their applications with additional actions as indicated above, and post the revised applications for public review.

We recommend that these programs address key programmatic and offset integrity elements and apply again in a later application period: The Carbon Forest Program (Poland), Global Carbon Trust, Nori, REDD.plus, CCER, and myclimate.

Due to the incomplete nature of the application put forward by the Clean Development Mechanism, we were **not able to review** the program. We recommend against any recommendation or decision on this program until further details are provided and made available for public comment.

³ Environmental Defense Fund. "Reducing aviation's climate impact". <https://www.edf.org/climate/aviation>

It is our assessment that ICAO and airlines can depend on REDD+ to provide a significant volume of robust offsets to help meet its emission reduction targets as well as a multitude of additional benefits in developing countries — including sustainable development, biodiversity conservation and improved human well-being — and to do so with environmental integrity.

REDD+ has a long track record of delivering high-quality emission reductions while also providing significant social, economic and biodiversity co-benefits. REDD+ programs support multiple Sustainable Development Goals, improve community livelihoods and enhance ecosystem health. Nature offers at least 30% of the solution to climate change but receives less than 2% of the funding. That needs to change if we are going to achieve global climate goals.

If implemented by robust programs that meet all of the EUCs, offsets from REDD+ traded under the CORSIA would provide a triple benefit: a secure supply of high-quality offsets that can help aviation meet its climate goals, a significant support for investment in forest protection, and benefits to local communities and developing countries.

Contact: Maggie Comstock, Senior Director, Climate Policy, Conservation International, mcomstock@conservation.org / +1 202-834-0030

Comment Set #6

Name:

Axel Michaelowa

Organization:

Perspectives Climate Group

Date of receipt:

5 September 2019

From: Aglaja Espelage <espelage@perspectives.cc>
Sent: 5-Sep-19 11:26
To: Office of the Environment
Cc: Kaja Weldner; Axel Michaelowa; Stephan Hoch
Subject: PCG Comment on the applications for assessment by TAB
Attachments: TAB_Public_Comment_Form Perspectives 05.09.19.pdf

Dear Ms Chalaeva, dear Madam or Sir,

Please find attached Axel Michaelowa's (Perspectives Climate Group) comment on the responses for the call for applications which focuses on the aspects of additionality, baselines and no net harm.

Please confirm receipt.

With kind regards,

Aglaja Espelage
Junior Consultant

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TAB Public Comment Template Form

The public is invited to submit comments on the responses to the call for applications, including regarding their alignment with the emissions units criteria (EUC).

The public is requested to use this form to provide structured comments on the responses to the call for applications that were submitted for assessment by the TAB. Public comments regarding the information submitted may be published online, along with the commenter name and organization.

Commenter Name: Axel Michaelowa

Commenter Organization: Perspectives Climate Group

Generic comments on nature of applicants

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Forest Carbon Partnership Facility	All	All	The FCPF is a World Bank operated fund that supports forest programmes generating carbon certificates, but did not develop its own offset standard. It thus is not an eligible standard.
Myclimate	All	All	Myclimate is not an offset standard, but an offset developer applying different offset standards. It thus is not an eligible standard.
REDD.plus	All	All	REDD.plus is an initiative to provide support to REDD+ activities which lacks critical features of an offset standard. It may develop such features of an offset standard in the future but currently does not have them, and thus should not be eligible.

Specific comments on EUC compliance of candidate programmes regarding additionality (3.1), realistic and credible baseline (3.2), absence of net harm (3.8)

Initial comment on additionality testing:

We interpret the requirement of additionality to be that “eligible offset credit programs should clearly demonstrate that the program has procedures in place to assess/test for additionality and that those procedures provide a reasonable assurance that the emissions reductions or avoided emissions would not have occurred in the absence of the offset program”. There are different approaches used to test additionality that differ in the degree they provide the required assurance.

Investment tests proved to have worked well to determine additionality, with significant experience accumulated under the CDM, whereas barrier and common practice tests can be considered insufficient in many cases, if applied without an investment analysis. Recently, standardization of additionality assessment through benchmarks or positive lists gained ground for some technologies. However, any form of standardization of parameters needs to be either highly conservative or updated regularly (for instance every 3-5 years, but this should be determined on a technology-specific level) to account for technology developments within the respective regional or national circumstances in which the offset activities are being implemented. For instance, under the CDM, some positive lists got “sticky” (i.e. less conservative) over time and their non-revision led to the crediting of renewable energy projects, whose additionality became more questionable after costs for the deployment of renewable energy had fallen substantially.

In general, additionality testing, but also baseline calculation, is heavily influenced by the overall context of the international climate policy regime. This is particularly true for the issue of consideration of national mitigation policies, which used to be ignored during the Kyoto Protocol era, as non-Annex I Parties were not expected to make mandatory contributions to global climate action. Under the CDM, the so-called E+/E- rules were adopted to avoid a perverse incentive for host country governments not to develop mitigation policies in order to protect CER revenues. When assessing additionality and establishing baselines, policies that provide a comparative advantage to more emission-intensive technologies (E+) were only taken into account if their adoption predated the adoption of the Kyoto Protocol in 1997. Policies that provided a comparative advantage to less emission-intensive technologies (E-) were only taken into account if adopted prior to the adoption of the Marrakech Accords in 2001. The application of this rule, however, led to the registration of projects which would have been deemed non-additional if national policies such as national renewable energy feed-in-tariffs would have been taken into account, and was therefore subject to criticism.

As all countries are contributing NDCs to achieving the Paris Agreement objectives, all national policies and activities need to be taken into account when reinterpreting additionality. The precise rules for assessing additionality in the context of NDCs and related national policies and

measures future are still subject to international negotiations. However, it is clear that the paradigm shift from a bifurcated climate regime to one in which all countries make contributions through their NDCs will affect the international rules for the assessment of additionality. Therefore, this criterion is not assessed in the comment on the standards applications.

Initial comment on baselines:

In the assessment, the focus is on the methodology development process. Baseline development is considered credible if the baselines are approved following independent third-party assessment and accompanied by full public transparency regarding the assumptions and parameters used to establish baselines. All types of standardized baselines must be subject to regular updates in order to reflect developments in economic, technological or other circumstances in a global, regional or country-specific context.

Initial comment on absence of net harm:

No net harm can only credibly be ensured if the program publishes specific social and environmental safeguards and publicly demonstrates compliance. Project proponents should be obligated to identify, mitigate, monitor and report on risks. In addition, the program should ensure consultation of local stakeholders and information on specific provisions on how to address concerns once raised.

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
American Carbon Registry	4.1	3.1	Insufficient: Applies either benchmarks or barrier tests, after additionality to current regulation is checked. Evidence for positive lists is provided. Investment test is not used. Common practice and barrier tests are generally not sufficient to test additionality, but might be sufficient for certain ACR project types.
British Columbia Offset Program	4.1	3.1	Sufficient: Applies investment analysis and a regulatory test. No positive lists are used, so they do not need to be updated or justified. However, they do not reply to the question how the procedures provide a reasonable assurance that mitigation would not have occurred in the absence of the programme.
China GHG Voluntary Emission Reduction Program	4.1	3.1	Sufficient: Applies investment analysis as per the CDM rules. There are provisions in place to address over-issuance.
Climate Action Reserve	4.1	3.1	Insufficient: Standardized additionality testing based on benchmarks and positive lists, but no investment analysis. The program manual (currently under revision) specifies that the performance standard test should also assess financial returns and implementation barriers of certain project types, there is no project-specific analysis undertaken. The program manual explains that “most reserve protocols” do contain an appendix explaining the analysis undertaken to establish the standard, partially also including an assessment of “typical” financial conditions. No regular revision of these performance standards is foreseen, even if the Reserve “may” review and update standards and baselines where it considers needed.

Clean Development Mechanism	4.1	3.1	Sufficient for large scale activities, partially insufficient for small-scale / micro-scale activities: Applies highly elaborated additionality tests developed over a period of more than a decade. Principally, the investment analysis, if applied in a conservative manner, will weed out non-additional projects. However, depending on the activity size and type positive lists have been applied recently, which have not been sufficiently updated over time. For example, micro-scale solar PV activities are generally deemed additional which may be inconsistent in some circumstances in light of recent massive cost decreases of solar PV.
Global Carbon Trust	4.1	3.1	Insufficient: Refers to tests used by Verra, CAR, CDM, allows both positive lists and benchmarks. Whether an investment analysis is always applied is unclear: first, the application of CDM methodologies is presented as the main approach to additionality testing, yet, then the application states that VCS, CAR and GS methodologies can also be used. It uses CDM positive lists for small-scale and micro scale activities (for critique on this approach, see comment to CDM). Of concern is the fact that GCT is currently developing project-specific simplified methodologies, however, the supporting documents used for analysis of technologies/fuels/feedstocks that lead to the positive lists are referred to as internal - documents that are not publicly accessible.
Gold Standard	4.1	3.1	Sufficient, except “simplified approaches”, partially insufficient for small-scale / micro-scale activities (as it applies CDM methodologies, see above): Essentially applies additionality tests from the CDM but does allow further additionality tests.
Nori	4.1	3.1	Insufficient: Only uses barrier test.
Thailand Greenhouse Gas Management Organization	4.1	3.1	Grossly insufficient: Small projects are automatically deemed additional without any explanation or justification for this. Simple payback period threshold of 3 years for large scale projects is not conservative, as this is not in line with standard commercial investment decision and commercial interest rates for project finance in Thailand.
State Forests of the Republic of Poland	4.1	3.1	Grossly insufficient: Neither application nor publicly available documents provide evidence of additionality testing.

Verra/VCS	4.1	3.1	Insufficient: For renewable energy and energy efficiency projects either performance benchmarks or positive lists are used (see: VCS standard, sections 3.14 and 4.1, http://verra.org/wp-content/uploads/2018/03/VCS_Standard_v3.7.pdf). Benchmarks cannot convincingly prove additionality of a given activity, especially in heterogeneous sectors. Positive lists under Verra are less conservative than under the CDM. For forestry projects, a combination of an investment test with common practice and barrier analysis is undertaken which is robust (therefore partially sufficient).
American Carbon Registry	4.2	3.2	Sufficient: While CDM approved methodologies are accepted, ACR also develops its own methodologies, which are assessed through a peer review process involving public comments and dedicated reviewers. Documentation (see https://americancarbonregistry.org/carbon-accounting/standards-methodologies) is excellent. Performance standards for additionality assessments are regularly reviewed; other methodologies and tools are reviewed in case of “significant changes” in context, data availability or need for clarification
British Columbia Offset Program	4.2	3.2	Insufficient: Application document does not describe baseline methodology development procedure. Official information of the BC programme at https://www2.gov.bc.ca/gov/content/environment/climate-change/industry/offset-projects does not specify the baseline methodology procedure applied. Baseline methodology for fuel switch (only methodology approved to date, https://www2.gov.bc.ca/assets/gov/environment/climate-change/ind/protocol/bc_fuel_switch_protocol_2019.pdf) is purely based on barrier analysis for baseline scenario selection. The submission also does not address the questions on baseline revision and baseline over-estimation.

China GHG Voluntary Emission Reduction Program	4.2	3.2	Partially insufficient: Applies approved CDM methodologies, and further methodologies which have been approved through a domestic procedure. Baseline review process is in place, but as methodologies and procedure are purely available in Chinese language, the conservativeness of the methodologies could not be checked. In order to be eligible, the program would have to translate both methodologies and procedures in English and make these translations publicly available.
Climate Action Reserve	4.2	3.2	Sufficient: Develops its own, detailed methodologies through a well-documented process, including peer review and public comments (https://www.climateactionreserve.org/how/protocols/) Baselines are reviewed at the end of the crediting period.
Clean Development Mechanism	4.2	3.2	Sufficient: Highly regulated baseline and monitoring methodology development process overseen by Meth Panel / Small Scale Panel. Over 200 technology-specific methodologies have been approved, and many of them have been significantly improved over the years as experience with their use has accumulated. The conservativeness of methodologies has generally increased through this regulatory process. Transparency is high.
Global Carbon Trust	4.2	3.2	Insufficient: Refers to Climate Action Reserve, CDM, Gold Standard and Verified Carbon Standard baseline methodologies all being eligible. Baseline revision is required. No baseline methodology development process has been clearly defined, so it is not possible to evaluate this. The baseline guidance document (https://gct.ga/Admin/Content/Baseline-and-Monitoring-Methodologies25112018893.pdf) is superficial and does not guarantee conservativeness.

Gold Standard	4.2	3.2	Partially insufficient: A detailed and transparent peer review process is undertaken and baseline revisions are addressed. However, methodologies from “credible” standards go through a simplified “fast track procedure”. These credible standards are not properly defined, but cited are CDM, Verra, CAR, ACR and others. This means that any comments given here on one of these standards re baseline methodologies applies here as well. . More recent methodologies for unconventional project types tend to be less conservative than the “older” ones. For example, Gold Standard cookstove methodologies allow to gain about twice as many credits than if one would use the respective CDM methodology. Gold Standard forestry methodologies lack an uncertainty assessment.
Nori	4.2	3.2	Insufficient: The croplands sequestration methodology refers mainly to a third-party model and does not address the critical questions of conservativeness. The methodology development and peer review process is not clear.
Thailand Greenhouse Gas Management Organization	4.2	3.2	Grossly Insufficient: Baseline methodologies are extremely short and not available in English (http://ghgreduction.tgo.or.th/tver-method/tver-methodology-for-voluntary-greenhouse-gas-reduction/ee.html). No evidence is provided in response to the questions on baselines in the submission. The baseline methodology development process is unclear. There are also insufficient requirements for baseline revision. In order to assess the methodologies, they as well as the process documents need to be available in English.
State Forests of the Republic of Poland	4.2	3.2	Grossly insufficient: No proper baseline methodology is applied; the baseline is administratively set from politically determined forest management plans.

Verra/VCS	4.2	3.2	Partially insufficient: VCS accepts CDM and CAR methodologies but also develops new methodologies involving public consultations and two reviews by external validation/verification bodies. Baseline revision is addressed for both normal projects and REDD projects. Methodology scope is very broad and some of the more recent methodologies for unusual project types have been subject of public criticism for not being conservative, e.g. the tidal wetland and seagrass methodology (Johannessen S C, Macdonald RW (2016): Geoengineering with seagrasses: is credit due where credit is given? Environ Res.Lett. 11 113001). A positive feature of VCS methodologies is that they consistently account for uncertainties.
American Carbon Registry	4.8	3.8	Partially insufficient: No net harm principle anchored in procedures, albeit no specific procedure for MRV of non-GHG impacts/safeguards of activities. While project proponents must identify community and environmental impacts of their projects and describe safeguards put in place, ACR does not require a particular process or tool if basic requirements are addressed. However, project proponents must publicly disclose any comments received from stakeholders during development, construction, operation and/or maintenance of the project and prove that these issues were addressed.
British Columbia Offset Program	4.8	3.8	Insufficient: No specific “no net harm” procedure; section 14 of GGECR is generic and does not relate to MRV of non-GHG impacts/safeguards of activities.
China GHG Voluntary Emission Reduction Program	4.8	3.8	Grossly insufficient: No specific “no net harm” procedure; only reference to general EIA, as well as no MRV of safeguards or “no net harm” .
Climate Action Reserve	4.8	3.8	Sufficient: Detailed “no net harm” guidance and MRV of actual “no net harm” and safeguards, resulting in cancellation of credits if harm has occurred during a certain period.
Clean Development Mechanism	4.8	3.8	Grossly insufficient: No specific “no net harm” procedure and no procedure for MRV of safeguards or “no net harm” .

Global Carbon Trust	4.8	3.8	Partially insufficient: No net harm principle anchored in procedures. For the projects supplying CORSIA the voluntary environment and social safeguards standard with risk assessment and monitoring of impacts will be made mandatory.
Gold Standard	4.8	3.8	Sufficient: While strong stakeholder consultation procedures make it likely that harm can be avoided, there is no specific “no net harm” rule applied by the Gold Standard. However, the approach employed by the Gold Standard is consistent with the TAB definition on no net harm. Environmental or social risks must be assessed, safeguards put in place where necessary and monitored and reported.
Nori	4.8	3.8	Grossly insufficient: No specific “no net harm” procedure and no procedure for MRV of non-GHG impacts of activities. Only general reference to compliance with all legal requirements
Thailand Greenhouse Gas Management Organization	4.8	3.8	Grossly insufficient: No specific “no net harm” procedure; only reference to general EIA.
State Forests of the Republic of Poland	4.8	3.8	Grossly insufficient: No specific “no net harm” procedure
Verra/VCS	4.8	3.8	Partially insufficient: Verra enshrines the principle of no net harm and requires identification and mitigation of potential risks. However, continued monitoring of non-GHG impacts are only mandatory under the additional CCBS and the standard SDVSta and not under the VCS. Currently, Verra is proposing to update VCS rules to strengthen stakeholder consultation requirements. This would inter alia include a risk, cost and benefit analysis for local stakeholders and the development of a grievance and redress process.

Comment Set #7

Name:

Martin Camilo Perez Lara

Organization:

Expert for the evaluation of the UNFCCC reports nominated by Colombia

Date of receipt:

5 September 2019

From: Martin Camilo perez lara <makalazz@hotmail.com>
Sent: 5-Sep-19 11:43
To: Office of the Environment
Subject: Comments CORSIA Emissions Unit Criteria (EUC)
Attachments: TAB_Public_Comment_Form Martin Perez.docx

These comments are specific to the REDD+ inclusion. Forest management is the main source of emission reductions based on sinks and its double counting would affect the credibility of the REDD+ mechanism and avoid carrying out ordered and aligned actions to public policy, affecting also the permanence of such reductions.

How REDD + activities are addressed depends on each country particularities, however, in any scenario the results measured must be transparent, demonstrable, verifiable and their financing is achieved with a mechanism called Results Based Payments (RBP) framed in the Warsaw Framework guidelines, in accordance with decisions 4 / CP.15, 1 / CP.16, 2-12 / CP.17, 29 / CP.18, 9 / CP .19, 13 / CP.19 and 13-Annex / CP.19. These decisions also establish that the results for the payment are measured with respect to a baseline or Forest Reference Emission Level (FREL) that can be constructed with any projection method that meets criteria of transparency, demonstrability, verifiability, consistency and precision, presented by states and to be included in a technical evaluation process of the UNFCCC.

Additionally, the tropical countries that sign the Paris Agreement, have mostly included avoided deforestation as part of compliance, reporting an official baseline, consistent with their FRELs. Of the FRELs presented, 27 have been evaluated by the UNFCCC, 8 have agreements for RBP (Brazil, Colombia, Costa Rica, Ecuador, Guyana, Indonesia, Peru and Viet Nam) and 5 have received payments (Brazil, Colombia, Ecuador, Guyana and Indonesia) accumulating the largest source of reductions by land use category. Thus, the selection of a program that includes REDD+ within the framework of the CORSIA unit eligibility criteria must take into account the alignment of REDD+ actions that are incentivized from CORSIA with respect to the FRELs, otherwise with certainty, it will generate a problem of double counting of emissions worldwide.

In this regard, none of the proposals presented is clear or requires in the development of its methods, the consistency with the FREL, there are ambiguous mentions on the subject such as the VCS nesting proposal, which however does not establish the timing of the nesting or specifically mentions the FREL (mentions jurisdictional baselines), or the WRI proposal based on ART whose technical development is still in process. In this context I make the recommendation; to require that any unit counted under REDD+ activities be measured under or is consistent with the FRELs presented to the UNFCCC.

Español

Estos comentarios son específicos para la inclusión de REDD+. La gestión forestal es la principal fuente de reducciones de emisiones basada en sumideros y su doble conteo afectaría la credibilidad del mecanismo REDD+ y operativamente en los países evitaría realizar acciones ordenadas y alineadas a la política pública, afectando a la vez la permanencia de dichas reducciones.

Como se aborden las actividades de REDD+ depende de las particularidades en cada país, sin embargo, en cualquier escenario los resultados deben ser transparentes, demostrables, verificables y su financiación se logra, entre otros, con un mecanismo denominado Pago Por Resultados (PPR) enmarcado en las directrices del Marco de Varsovia, de conformidad con las decisiones 4/CP.15, 1/CP.16, 2-12/CP.17, 29/CP.18, 9/CP.19, 13/CP.19 y 13-Anexo/CP.19. Estas decisiones también establecen que los resultados para el pago se miden respecto una línea base o Nivel de Referencia de Emisiones Forestales (NREF) que se puede construir con cualquier método de proyección que cumpla criterios de

transparencia, demostrabilidad, verificabilidad, consistencia y precisión, presentados por los estados e incluidos en un proceso de evaluación técnica de la CMNUCC.

Adicionalmente, los países tropicales firmantes del Acuerdo de París, han incluido en su mayoría a la deforestación evitada como parte del cumplimiento, reportando una línea base oficial de debe ser consistente con sus NREF. De los NREF presentados 27 han sido evaluados por la CMNUCC y se han 8 firmado acuerdos de pagos por resultados con oportunidad de operación futura (Brasil, Colombia, Costa Rica, Ecuador, Guyana, Indonesia Perú y Viet Nam) y cinco han recibido pagos (Brasil, Colombia, Ecuador, Guyana e Indonesia) acumulando la mayor fuente de reducciones por la categoría de uso del suelo. Es así que la selección de un programa que incluya REDD+ en el marco de los criterios de elegibilidad de unidades de CORSIA debe tener en cuenta la alineación de las acciones de REDD+ que se incentiven desde CORSIA respecto a los NREF, de lo contrario con seguridad, generará un problema de doble conteo de emisiones a nivel mundial.

Al respecto, ninguna de las propuestas presentadas es clara o exige en el desarrollo de sus métodos, la consistencia con los NREF, hay menciones ambiguas sobre el tema como la propuesta de anidamiento del VCS, que sin embargo no establece puntualmente la temporalidad del anidamiento ni menciona específicamente a los NREF (menciona líneas base jurisdiccionales), o la propuesta de WRI basada en ART cuyo desarrollo técnico aun esta en proceso. En este contexto hago la recomendación, sin importar cual sea el programa seleccionado, de requerir como criterio sine qua non, que cualquier unidad contada bajo las actividades REDD+, esté medida bajo o sea consistente con los NREF presentados ante la CMNUCC.

Martin Camilo Perez Lara

Experto para la evaluación de informes de la CMNUCC

Nominado por Colombia

TAB Public Comment Template Form

The public is invited to submit comments on the responses to the call for applications, including regarding their alignment with the emissions units criteria (EUC).

The public is requested to use this form to provide structured comments on the responses to the call for applications that were submitted for assessment by the TAB. Public comments regarding the information submitted may be published online, along with the commenter name and organization.

Commenter Name: Martin Camilo Perez Lara

Commenter Organization: Expert for the evaluation of the UNFCCC reports; Nominated by Colombia

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Example: ABC Program	Example: Section 3.9	Example: Safeguards System (paragraph 2.9)	
All			<p>These comments are specific to the REDD+ inclusion. Forest management is the main source of emission reductions based on sinks and its double counting would affect the credibility of the REDD+ mechanism and avoid carrying out ordered and aligned actions to public policy, affecting also the permanence of such reductions.</p> <p>How REDD + activities are addressed depends on each country particularities, however, in any scenario the results measured must be transparent, demonstrable, verifiable and their financing is achieved with a mechanism called Results Based Payments (RBP) framed in the Warsaw Framework guidelines, in accordance with decisions 4 / CP.15, 1 / CP.16, 2-12 / CP.17, 29 / CP.18, 9 / CP .19, 13 / CP.19 and 13-Annex / CP.19. These decisions also establish that the results for the payment are measured with respect to a baseline or Forest Reference Emission Level (FREL) that can be constructed with any projection method that meets criteria of transparency, demonstrability, verifiability, consistency and</p>

			<p>precision, presented by states and to be included in a technical evaluation process of the UNFCCC.</p> <p>Additionally, the tropical countries that sign the Paris Agreement, have mostly included avoided deforestation as part of compliance, reporting an official baseline, consistent with their FRELs. Of the FRELs presented, 27 have been evaluated by the UNFCCC, 8 have agreements for RBP (Brazil, Colombia, Costa Rica, Ecuador, Guyana, Indonesia, Peru and Viet Nam) and 5 have received payments (Brazil, Colombia, Ecuador, Guyana and Indonesia) accumulating the largest source of reductions by land use category. Thus, <u>the selection of a program that includes REDD+ within the framework of the CORSIA unit eligibility criteria must take into account the alignment of REDD+ actions that are incentivized from CORSIA with respect to the FRELs, otherwise with certainty, it will generate a problem of double counting of emissions worldwide.</u></p> <p>In this regard, none of the proposals presented is clear or requires in the development of its methods, the consistency with the FREL, there are ambiguous mentions on the subject such as the VCS nesting proposal, which however does not establish the timing of the nesting or specifically mentions the FREL (mentions jurisdictional baselines), or the WRI proposal based on ART whose technical development is still in process. In this context I make the recommendation; to require that any unit counted under REDD+ activities be measured under or is consistent with the FRELs presented to the UNFCCC.</p>
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* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Comment Set #8

Name:

Dietrich Brockhagen

Organization:

atmosfair gGmbH

Date of receipt:

5 September 2019

From: eickhold@atmosfair.de
Sent: 5-Sep-19 11:43
To: Office of the Environment; Dietrich Brockhagen; Michaela Thureau; neff@atmosfair.de
Subject: atmosfair comments on programm applications to ICAO/CORSIA
Attachments: TAB_Public_Comment_Form atmosfair gGmbH 050919 FE.pdf

Dear TAB-Team,

Following your invitation of the public to submit comments on the responses to the call for applications of emission unit programs, we submit our comments attached.

Please feel free to contact with us for further exchange.

Sincerely yours,

Florian Eickhold

atmosfair gGmbH
Zossener 55-58, 10961 Berlin
+49 30 120848092
+34 663939964
eickhold@atmosfair.de

www.atmosfair.de
http://secure-web.cisco.com/1kJPDPj307EiSOMU5OVerQEelokuf2MRclDgFZKF9gwwE6LD2FZigsMf7qvyrKYVBaNGHngTnj7UB2vrZ7kNs9-aTKC2LJZeZ21h55WKucvf3ipwED4CqBMZtWvmz2ndQ7R44lrzaIESYq4sppfAsp4priQEhe7EYUqiAujhF4pHdK5DZV6o5I8h6Y79Hm6PqTTRt-tMIE_RB2v58TPGqsacUil9Q9vWAwhbSHZhFvXGEvn_f6mqmJizE2MSEcYXJ0ebK69ztFjlqIhoFgKxgXYNagqcp6dqffYilLPWRqyNvgZtY1N9f0p6DnFpbKHhyxV7IYHenXHvpTR_X5w/http%3A%2F%2Fwww.facebook.com%2FKlimabewusstreisen

atmosfair gGmbH, Sitz: Kaiserstr. 201, 53113 Bonn, Handelsregister Bonn HRB 13789
Geschäftsführer: Dr. Dietrich Brockhagen, Steffen Pohlmann

TAB Public Comment Template Form

The public is invited to submit comments on the responses to the call for applications, including regarding their alignment with the emissions units criteria (EUC).

The public is requested to use this form to provide structured comments on the responses to the call for applications that were submitted for assessment by the TAB. Public comments regarding the information submitted may be published online, along with the commenter name and organization.

Commenter Name:

Dr. Dietrich Brockhagen, CEO

Commenter Organization:

atmosfair gGmbH

Zossener 55-58, 10961 Berlin, Germany

+49 30 120848000

info@atmosfair.de

www.atmosfair.de

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
CDM and all other private programs	All Sections	All criteria	1) Endangered consistency with the Paris Agreement <ul style="list-style-type: none"> a. The CDM is the only program with international oversight by the UNFCCC. None of the private programs fulfill this essential requirement to assure alignment and consistency with the Paris Agreement especially regarding the following crucial aspects: <ul style="list-style-type: none"> i. Avoidance of double counting, ii. Ambition raising

			<ul style="list-style-type: none"> iii. Alignment with Art. 6.2 and 6.4 of the Paris Agreement iv. Achievement of overall global emission reductions <p>2) Additionality</p> <ul style="list-style-type: none"> a. None of the existing programs address sufficiently the issue of additionality. The criteria to determine whether an emission reduction project is additional must be improved by including a minimum ratio between the financial support received through carbon finance and the overall project costs. The higher the portion of carbon finance in the total project financing is, the more likely it is that the project is “additional”. <p>3) Qualification and accreditation standards of auditors</p> <ul style="list-style-type: none"> a. Independent and qualified auditors are essential for a consistent MRV system. Auditors have to be accredited and controlled by an international body like the UNFCCC and they must be liable for their work. <p>4) Negative list of projects</p> <ul style="list-style-type: none"> a. The following project types should be excluded from CORSIA <ul style="list-style-type: none"> i. Project types excluded by CDM, Gold Standard and the ones not eligible for the EU ETS ii. Wind power (with the exception of pilot projects): Only pioneer wind power projects should be eligible. In other words, e.g. the first project in a region where no wind power capacities previously existed or projects that utilize a new yet risky technology. Credible evidence of the additionality of wind projects cannot otherwise be provided. iii. Solar energy projects that involve mercury lamps or lead accumulators for solar home systems. iv. Geological carbon sequestration projects v. Biomass projects, if the biomass used is not sustainable or leakage emissions are detected. <p>5) Forestry projects and projects of carbon sequestration in the soil - the issue of permanency</p>
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			a. Forestry projects and projects of carbon sequestration in the soil can only be eligible for CORSIA if they are embedded in a state regulated framework based of long term (min. 20 years) bilateral or multilateral agreements.

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Comment Set #9

Name:

Daniel Wegen

Organization:

Shell International B.V.

Date of receipt:

5 September 2019

From: Daniel.Wegen@shell.com
Sent: 5-Sep-19 14:01
To: Office of the Environment
Subject: Advancing Eligible Emission Units for CORSIA - Shell comments on the responses to the call for applications
Attachments: 20190905 - Shell comments on CORSIA submissions.pdf

Dear Sir/Madam,

Thank you for the opportunity to provide comments on the responses to the call for applications for assessment against the CORSIA Emissions Unit Criteria.

Please find attached comments submitted on behalf of Shell International B.V.

I remain available to provide further details or clarification.

Sincerely,
Daniel Wegen

Daniel Wegen
Government Relations Advisor
Shell International B.V.

Carel van Bylandtlaan 16, 2596 HR
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Mobile: +31 (0)6 1533 0518
Email: daniel.wegen@shell.com



Advancing Eligible Emission Units for CORSIA Comments on Applications by Shell September 2019

Introduction

Shell is pleased to submit this letter in response to the International Civil Aviation Organisation's (ICAO) invitation to the public to comment on the 14 applications made to ICAO's Technical Advisory Body (TAB) for assessment against the Emissions Unit Criteria (EUC).

Decarbonization within the aviation sector will be a significant challenge, due to the projected growth in activity with passenger numbers expected to double by 2037, and the few lower carbon options available. Therefore, a multi-pronged approach is required, with significant investments and changes across the whole aviation value chain. New low carbon fuels and propulsion systems will have to be developed, the use of alternative modes of transport optimised, and the efficiencies of air transport logistics and infrastructure increased, all in alignment with consumer acceptance. In addition, aviation will need to use emissions offsets through the transition and mitigate any residual fossil fuel use in a net zero emissions world.

Shell welcomes ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) cap on emissions at 2020 levels as a significant achievement for international aviation and for our climate. This will be a big step towards the sector playing its full role in delivering the targets set-out in the Paris Climate Change Agreement. We recognize the enormous work, both technical and political, that has gone into CORSIA to date. CORSIA will need to use a full range of solutions to address emissions growth from international aviation but can only be successful if it can demonstrate credibility in terms of carbon impact. We support the criteria set out by the TAB.

Shell has a strong presence as a producer and marketer of conventional jet fuel. Shell is present in 900 airport locations, operates across 45 countries (refuelling and lubricants) and refuels an aircraft on average, every 14 seconds. We stand ready to play an active part in helping the aviation sector achieve its greenhouse gas (GHG) emission reduction goals.

We have put in place our own Net Carbon Footprint Ambition to ensure the products we sell stay in step with the demands of society.¹ We aim to cut the net carbon footprint of the energy products we sell globally – measured in grams of CO₂ per megajoule of energy consumed – by around 20% in 2035 and 50% by 2050, in step with society's drive to meet the Paris Climate Agreement. Our "New Energies" business was set up in 2016, to help support our ambition. We plan to invest on average \$1-2 billion a year in New Energies until 2020 via commercial investments in New Fuels - hydrogen, biofuels and electric vehicle charging – and Power. In addition, we have also established a business to develop high quality nature based solutions (NBS) to expand the range of solutions we can use to reduce and offset emissions generated by our customers and to meet the goals of the Paris Agreement. Shell plans to invest \$300 million from 2019 to 2021 in natural ecosystems.

¹ <https://www.shell.com/energy-and-innovation/the-energy-future/what-is-shells-net-carbon-footprint-ambition.html>



Application process and general observation

Shell supports the competitive framework that CORSIA has adopted, which allows carbon programmes to demonstrate quality and innovation in their work and in setting robust requirements for measuring, reporting, verifying, certifying and registering GHG reductions.

We are also encouraged by the fact that 12 of the 14 submissions included methodologies for natural climate solutions, which can offer up to 30% of the needed mitigation globally through 2030, but currently receive less than 2% of the public climate finance globally.

General comments on the submissions

1. **Incomplete applications:** Entities applying for CORSIA should demonstrate their experience and capabilities across the full spectrum of functions envisioned for CORSIA. This should include all Program Design Elements and Carbon Offset Credit Integrity Assessment Criteria. Approval of incomplete programmes would present risks to the integrity of CORSIA and the level of public trust in CORSIA.
2. **Accounting uncertainty:** There should be no double counting and all submissions must provide clarity on how this will be precluded. However, we note that these rules depend largely on the outcomes of the Article 6 negotiations. Therefore, we request TAB to provide clear guidance on how to ensure there is no double counting in the absence of Article 6 being fully agreed and to undertake another review on how to manage the issue of potential double counting once provisions under Article 6 have been finalized.
3. **Nesting:** We encourage the TAB to support programmes which incorporate nature-based solutions, including stand-alone and jurisdictional level (national and sub-national) projects. We recognize the need for regulation to ensure carbon accounting integrity at a national level and believe that appropriate regulatory solutions exist. The nesting requirement in the submission by VERRA is one such approach. However, nesting is not the only way to ensure carbon accounting integrity and given there are a limited number of nested projects available in the market in the near term, excluding stand-alone projects will have a significant impact on the number of high quality credits available for CORSIA. We therefore suggest high-quality stand-alone projects also be considered eligible for CORSIA until such time nesting is a more widely understood and adopted approach.
4. **Transition of existing supply:** The credits which currently exist on the market are generated under a range of verification protocols with varying levels of environmental integrity. To safeguard the credibility of CORSIA care should be taken to ensure only the highest quality of the current credits – those with strong Measurement, Recording and Verification pathways – qualify for use in the scheme. An alternative option to manage the issue could be to set vintage restrictions based on issuance date and quality criteria.



Conclusion

In conclusion we encourage CORSIA and participating countries to take a closer look at natural climate solutions, which represent high quality carbon removals and cost-effective climate solutions for the aviation sector. It's notable that all but two of the programs included methodologies for natural climate solutions, and that several program applications included REDD+ methodologies, which has the largest mitigation potential of the natural climate solutions. Including natural climate solutions as an eligible offset option under CORSIA, can also help deliver many other benefits, including improvements in biodiversity, water quality, flood protection and livelihoods.

If you have any queries regarding this submission, please contact: Daniel Wegen at Daniel.Wegen@shell.com

Comment Set #10

Name:

Brad Schallert, John Holler

Organization:

World Wildlife Fund (WWF-US)

Date of receipt:

5 September 2019

From: Holler, John <John.Holler@wwfus.org>
Sent: 5-Sep-19 15:41
To: Office of the Environment
Cc: Schallert, Brad
Subject: Comments on Emissions Unit Program Applications (WWF-US)
Attachments: WWF-US CORSIA Program Public Comments.pdf; WWF-US CORSIA Program Public Comments.docx

Dear Office of Environment,

Please accept for consideration the attached comments from WWF-US on the 14 responses to ICAO's call for emissions unit program applications.

Comments have been provided in both Word and PDF format in the form provided on the [Technical Advisory Body \(TAB\) website](#). We understand that comments may be published online, along with the commenter name and organization.

John

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TAB Public Comment Template Form

The public is invited to submit comments on the responses to the call for applications, including regarding their alignment with the emissions units criteria (EUC).

The public is requested to use this form to provide structured comments on the responses to the call for applications that were submitted for assessment by the TAB. Public comments regarding the information submitted may be published online, along with the commenter name and organization.

Commenter Name: Brad Schallert, John Holler

Commenter Organization: World Wildlife Fund (WWF-US)

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
<i>Example: ABC Program</i>	<i>Example: Section 3.9</i>	<i>Example: Safeguards System (paragraph 2.9)</i>	
Applicable to Multiple Programs			
Applicable to all programs	N/A	N/A	Several programs have communicated plans to modify existing rules, or to establish new policies, to comply with the CORSIA Emissions Unit Eligibility Criteria (e.g. avoidance of double counting). Only programs which meet all of the EUC at the time of submitting their application form to the TAB should be eligible for use under CORSIA. While the TAB could consider provisionally approving programs and making those programs subject to disqualification when their rules and procedures are not updated by a specific date, there are currently no rules or procedures to allow for this. This could also add unnecessary complication to the TAB approval processes and create unneeded uncertainty for the offset credit market.
Applicable to all programs	Section 3.10 and Section 4.7	Avoidance of Double Counting, Issuance	Not all programs have sufficiently communicated how they will avoid double counting. Some programs have indicated a willingness or intent to change their program procedures to meet the EUCs. The TAB should

		and Claiming (paragraph 2.11)	require applicants to adhere to specific double counting procedures. We recommend that programs avoid double counting by adhering to the guidance in Version 1.0 of the Guidelines on Avoiding Double Counting for the Carbon Offsetting and Reduction Scheme for International Aviation . The Guidelines were developed through a multi-stakeholder consensus decision-making process, by a working group consisting of representatives of the American Carbon Registry, Carbon Market Watch, Climate Action Reserve, Environmental Defense Fund, the Gold Standard Foundation, the International Emissions Trading Association, Verra, and the World Wildlife Fund, with critical input from outside experts. The Guidelines are a first version. They may be updated in the future considering any new SARPs adopted or amended under ICAO or any decisions adopted by the CMA, in order to support consistency between these Guidelines and decisions under ICAO and the Paris Agreement.
Applicable to all programs, with comment elsewhere in this form for: American Carbon Registry; Climate Action Reserve; Forest Carbon Partnership Facility, Gold Standard; The State Forests of the Republic of Poland	Sheet A	Scope Considerations (paragraph 2.2)	Project-based activities that are included within the definition of REDD+ (e.g., REDD, IFM, and ARR) should be nested in jurisdictional REDD+ programs that have high-quality, reference levels--submitted to and assessed by third-party experts. They should be nested in a way that is consistent with the jurisdiction's national plans and NDCs. These project-based activities should not be eligible unless a program is able to produce project-by-project details that demonstrate no risk of leakage, equitable benefit sharing, and sufficient measures to avoid double counting.
Applicable to all programs	Sheet B	Scope Considerations (paragraph 2.2)	The additionality and program eligibility of renewable energy projects in certain country contexts has come under significant scrutiny and the TAB should take this into consideration. Verra is proposing to revise the scope of the VCS Program to exclude any new renewable energy, waste heat, biomass and fossil fuel switch projects in the non-LDC context, large scale replacement of electric lighting with more energy efficient lighting and

			grid upgrade activities in the non-LDC context, and large scale hydroelectric projects in the LDC context. Gold Standard is proposing to restrict all renewable energy projects to the LDC, LLDC or SIDS context. The TAB should consider the scrutiny from applying GHG programs of these activities as evidence that their additionality is becoming increasingly difficult to justify. TAB should likewise consider restricting these activities from CORSIA eligibility, and/or limiting eligibility to projects that first begin reducing emissions after 2020 to more fully account for these proposed scope changes and protect the integrity of CORSIA.
Applicable to all programs, with comment elsewhere in this form for: Forest Carbon Partnership Facility; Global Carbon Trust; Nori; myclimate	Section 3.7	Program Governance (paragraph 2.7.2)	A program is not operational if it has no approved methodologies, no registry platform, or no (non-pilot) projects. TAB should not approve a program before all of its critical parts are established and sufficiently tested. TAB likewise should not consider the length that a program has been "governed and operational" to be based on the date of incorporation.
Applicable to all programs, with comment elsewhere in this form for: Forest Carbon Partnership Facility; Global Carbon Trust; Nori; REDD.plus; The State Forests of the Republic of Poland	Section 4.5	Permanence (paragraph 3.5)	TAB should only approve programs that have a credible and robust mechanism in place to identify, monitor and fully compensate reversals. TAB should ensure that programs with buffer pool mechanisms can maintain the solvency of those mechanisms under reasonably foreseeable circumstances and account for an appropriate level of risk in their management.

<p>Applicable to all programs, with comment elsewhere in this form for: China GHG Voluntary Emission Reduction Program (CCER); Global Carbon Trust; Verified Carbon Standard</p>	<p>Section 3.1</p>	<p>Clear methodologies and protocols, and their development process (paragraph 3.1)</p>	<p>The rigor and appropriate application of a methodology may depend on program-specific rules and requirements (e.g., VCS program ozone depleting substance (ODS) methodologies are supplemented with a separate ODS-specific rules document). Where a methodology is applied under a different program than the one under which it was developed, there is a risk that the adopting program has not taken into full consideration how the methodology's integrity may rely on program-specific rules that it has not likewise adopted. Where an application indicates that the program has approved the use of methodologies or protocols developed under a different program, the TAB should require proof that the program has performed a rigorous assessment to demonstrate that those methodologies are appropriate for the applying program to adopt.</p>
<p>Applicable to all programs, with specific comments elaborated elsewhere in this form for: myclimate</p>	<p>Section 3.4 and Section 3.7</p>	<p>Identification and Tracking (paragraph 2.4.6); Program Governance (paragraph 2.7.3)</p>	<p>TAB should consider ineligible all programs that engage in project development because this would present a significant conflict of interest.</p>
<p>Applicable to all programs, with specific comments elaborated elsewhere in this form for: Global Carbon Trust; myclimate; Nori; REDD.plus; and Thailand Greenhouse Gas</p>	<p>Section 3.4 and Section 3.7 and Section 4.3</p>	<p>Identification and Tracking (paragraph 2.4.6); Program Governance (paragraph 2.7.3); Auditor conflicts of interest (paragraph 3.3.3)</p>	<p>TAB should consider incomplete any application that is unable to produce public evidence for questions related to conflicts of interest and the program should be considered ineligible until such sufficient evidence is produced.</p>

Management Organization			
Program-Specific Comments			
American Carbon Registry	Sheet A	Scope Considerations (paragraph 2.2)	Project-based activities that are included within the definition of REDD+ (e.g., REDD, IFM, and ARR) should be nested in jurisdictional REDD+ programs that have high-quality, reference levels--submitted to and assessed by third-party experts. They should be nested in a way that is consistent with the jurisdiction's national plans and NDCs. These project-based activities should not be eligible unless a program is able to produce project-by-project details that demonstrate no risk of leakage, equitable benefit sharing, and sufficient measures to avoid double counting.
British Columbia Offset Program	Section 4.1	N/A	Section 4.1 of the application does not state the threshold for over-issuance risk. TAB should clarify this question.
China GHG Voluntary Emission Reduction Program (CCER)	Section 3.5	Legal Nature and Transfer of Units (paragraph 2.5)	Section 3.5 of the application does not define and ensure the underlying attributes and property aspects of a unit, and provides no explanation in the application about this.
China GHG Voluntary Emission Reduction Program (CCER)	Section 4.1	Carbon offset programs must generate units that represent emissions reductions, avoidance, or removals that are additional (paragraph 3.1)	Section 4.1 of the application indicates no use of automatic additionality assessments (e.g., positive lists). However, CCER applies CDM methodologies that contain positive list assessments. It is not clear from the application whether those positive list assessments in the CDM methodologies are applicable under CCER because the program documentation has not been fully described in English as is required by the application form's instructions.
China GHG Voluntary Emission Reduction Program (CCER)	Section 3.1	Clear methodologies and protocols, and their development process (paragraph 3.1)	The rigor and appropriate application of a methodology may depend on program-specific rules and requirements (e.g., VCS program Ozone depleting substance (ODS) methodologies are supplemented with a separate ODS-specific rules document). Where a methodology is applied under a different program than the one under which it was developed,

			<p>there is a risk that the adopting program has not taken into full consideration how the methodology's integrity may rely on program-specific rules that it has not likewise adopted. Where an application indicates that the program has approved the use of methodologies or protocols developed under a different program, the TAB should require proof that the program has performed a rigorous assessment to demonstrate that those methodologies are appropriate for the applying program to adopt.</p>
Clean Development Mechanism	N/A	N/A	<p>Assembly Resolution A39-3 Paragraph 21 decides that "emissions units generated from mechanisms established under the UNFCCC and the Paris Agreement are eligible for use in CORSIA, provided that they align with decisions by the Council, with the technical contribution of CAEP, including on avoiding double counting and on eligible vintage and timeframe". Note that Assembly Resolution A39-3 Paragraph 21 was written before the Council agreed the emissions unit criteria (EUC) and should not be read as an implicit approval of the Clean Development Mechanism (CDM). The CDM Executive Board has decided that it would not be appropriate to provide responses to the questions in the application. This decision prevents TAB from having the required information--which is not sufficiently provided by the CDM on its website--to ascertain whether the CDM aligns with the decisions of the Council and contributions of CAEP; and as a result, the TAB cannot approve the CDM as a CORSIA eligible program. While a detailed assessment of CDM is not included in these comments (because of the aforementioned issues), note that CDM is not equipped to adhere to the double counting EUC. The response provided for CDM also demonstrates that where future issues should arise pertaining to the CDM, the TAB will not receive the required attention from CDM to assess or resolve such issues. This should prompt concern that the CDM will not be able to ensure that its projects are adhering to the emissions unit criteria. The TAB should request the CDM to apply as other programs have done, but otherwise not approve the CDM.</p>

Climate Action Reserve	Sheet A	Scope Considerations (paragraph 2.2)	Project-based activities that are included within the definition of REDD+ (e.g., REDD, IFM, and ARR) should be nested in jurisdictional REDD+ programs that have high-quality, reference levels--submitted to and assessed by third-party experts. They should be nested in a way that is consistent with the jurisdiction's national plans and NDCs. These project-based activities should not be eligible unless a program is able to produce project-by-project details that demonstrate no risk of leakage, equitable benefit sharing, and sufficient measures to avoid double counting.
Climate Action Reserve	Section III, Part 2	N/A	The Program Summary states: "Both CRTs and ROCs will be considered for qualification for use in the CORSIA program, as both credit types meet the Emissions Unit Criteria as adopted by ICAO." However, ROCS are issued using ARB protocols, which are not listed in Sheet C, "Methodologies/Protocols List". Further, it is not explained in the application how the Climate Action Reserve voluntary offset program's procedures (e.g., deployment of a buffer pool for permanence) differs from those under its function as a ROC-issuing Offset Project Registry under California's Cap-and-Trade Program.
Forest Carbon Partnership Facility	Sheet A	Scope Considerations (paragraph 2.2)	Project-based activities that are included within the definition of REDD+ (e.g., REDD, IFM, and ARR) should be nested in jurisdictional REDD+ programs that have high-quality, reference levels--submitted to and assessed by third-party experts. They should be nested in a way that is consistent with the jurisdiction's national plans and NDCs. These project-based activities should not be eligible unless a program is able to produce project-by-project details that demonstrate no risk of leakage, equitable benefit sharing, and sufficient measures to avoid double counting.
Forest Carbon Partnership Facility	Section 3.4	Identification and Tracking (paragraph 2.4)	Section 3.4 of the application indicates that there a registry is in development and is not currently operational. A program is not operational if it has no registry platform and t would not be appropriate to approve a program before all of its critical parts are established and

			tested. TAB should not approve any program that does not have a publicly available registry or registry procedures
Forest Carbon Partnership Facility	Section 3.6(b)	Validation and Verification procedures (paragraph 2.6)	Section 3.6(b) of the application states that validations are conducted by a Technical Advisory Panel that includes 4-5 independent experts. The application should clarify whether these experts are accredited under a recognized accreditation body for GHG project validation.
Forest Carbon Partnership Facility	Section 4.1	Validation and Verification procedures (paragraph 2.6)	In Section 4.1, the application indicates that additionality and baseline setting is assessed by an accredited entity, but this indication is not clearly supported by the summary and evidence of this section. The summary suggests that the additionality/baseline is assessed at the validation stage by the Technical Advisory Panel, which the application does not define as an accredited entity. (Note that assessing the baseline is distinct from assessing the emissions and removals against the baseline, which is described as a duty performed by an accredited entity). The application should clarify whether the additionality and baseline-setting is assessed by an accredited entity.
Forest Carbon Partnership Facility	Section 3.7(b)	Program longevity (paragraph 2.7.2)	Section 3.7(b) of the application does not speak to whether the programs' plans for long-term administration include possible responses to the dissolution of the program. The application should address this element of the question.
Forest Carbon Partnership Facility	Section 4.2	Baseline revision (paragraph 3.2.3)	Section 4.2 of the application does not indicate that there are procedures in place to respond to changing baseline conditions. The application should address how the program's baseline will respond to changing conditions that were not reflected or foreseen in the original selection of the baseline, which is determined from historical data.
Global Carbon Trust	Section 3.1	Clear methodologies and protocols, and their development process (paragraph 3.1)	The rigor and appropriate application of a methodology may depend on program-specific rules and requirements (e.g., VCS program Ozone Depleting Substance (ODS) methodologies are supplemented with a separate ODS-specific rules document). Where a methodology is applied under a different program than the one under which it was developed,

			there is a risk that the adopting program has not taken into full consideration how the methodology's integrity may rely on program-specific rules that it has not likewise adopted. Where an application indicates that the program has approved the use of methodologies or protocols developed under a different program, the TAB should require proof that the program has performed a rigorous assessment to demonstrate that those methodologies are appropriate for the applying program to adopt.
Global Carbon Trust	Section 3.7	Program Governance (paragraph 2.7.2)	<p>Section 3.7 of the application states that the program does not currently have a registry (expected October 2019), does not have any projects, and it is not clear which, if any, methodologies it has approved for use under the program.</p> <p>A program is not operational if it has no approved methodologies, no registry platform, or no (non-pilot) projects. TAB should not approve a program before all of its critical parts are established and sufficiently tested. TAB likewise should not consider the length that a program has been "governed and operational" to be based on the date of incorporation.</p>
Global Carbon Trust	Section 3.4	Identification and Tracking (paragraph 2.4)	Section 3.4 of the application represents that the program registry adheres to the capabilities identified in (a)-(e). The evidence provided is limited to a webpage of the IHS Markit environmental registry with no information specific to the Global Carbon Trust. TAB should not consider an application complete if it does not provide evidence of registry capabilities that the application indicates are in place.
Global Carbon Trust	Section 3.4	Identification and Tracking (paragraph 2.4)	Section 3.4 does not indicate any specific international data exchange standards to which the program registry conforms. TAB should not consider this application complete until clarification is provided.
Global Carbon Trust	Section 3.4	Registry administrator conflicts of interest (paragraph 2.4.6)	Section 3.4 indicates that there are policies in place to prevent the program registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services. As evidence, the application directs to the IHS Markit terms and

			<p>conditions for registry accounts. These terms set out the terms on which Markit offers to make the Markit Environmental Registry (“Markit Registry”) available to the Account Holder and does not address conflict of interest policies applied by IHS Markit or the program registry administrator. TAB should clarify (1) who is administering the Global Carbon Trust program registry (e.g. is it the registry provider IHS Markit?) and (2) whether and where policies exist to prevent the program registry administrators from having conflicts of interest.</p>
Global Carbon Trust	Section 3.5	Legal Nature and Transfer of Units (paragraph 2.5)	<p>Section 3.5 enquires whether the program has policies and procedures in place regarding the legal nature and transfer of units. The application states that " IHS Markit’s policies regarding legal title to units is outlined in our terms and conditions: https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf." The IHS Markit terms and conditions speak only to the registry provider, IHS Markit's, guarantees including that: "the Account Holder acknowledges and agrees that Markit does not in any way guarantee legal title to the Units and the Account Holder relies on any content obtained through the Markit Registry at its own risk. For the avoidance of doubt, Markit is under no obligation to verify or otherwise enquire into the validity of, or legal title to, the Units." The legal nature and transfer of units should be addressed by the program, not the provider of the registry infrastructure, and the application does not sufficiently provide this information. TAB should not approve any program that does not have policies and procedures in place regarding the legal nature and transfer of credits.</p>
Global Carbon Trust	Sheet A	Scope Considerations (paragraph 2.2)	<p>Sheet A of the application identifies five specific sectors of activities supported by the program. Sheet C lists methodologies that support activities described in Sheet A. The methodologies listed in Sheet C, including all CDM, VCS, GS and CAR methodologies, account for sectors beyond those described in Sheet A. TAB should seek clarity on this discrepancy and which methodologies have been approved for use under the program.</p>

Global Carbon Trust	Section 4.1	N/A	Section 4.1 of the application misinterprets the meaning of "over-issuance". TAB should clarify with the respondent and seek clarity on the response.
Global Carbon Trust	Section 4.1	Carbon offset programs must generate units that represent emissions reductions, avoidance, or removals that are additional (paragraph 3.1)	Section 4.1 of the application cites multiple CDM additionality tools, but it is not clear how these would or would not be applied to projects applying a non-CDM methodology. The TAB should clarify how the additionality of a project using a non-CDM methodology would be applied, particularly if the methodology has a unique methodological approach to additionality.
Global Carbon Trust	Section 4.2	Carbon offset credits must be based on a realistic and credible baseline (paragraph 3.2)	Section 4.2 of the application cites CDM baseline determination approaches, but it is not clear how these would or would not be applied to projects applying a non-CDM methodology. The TAB should clarify what procedures are in place for determining the baseline of a project using a non-CDM methodology.
Global Carbon Trust	Section 4.5	Permanence (paragraph 3.5)	Section 4.5 indicates that 10 percent of emissions reductions are not issued for ARR projects to account for non-permanence. It does not describe if or how reversals are identified, monitored, or compensated for if the reversal is greater than 10 percent. Section 4.5 only addresses the non-permanence risk of ARR projects and does not account for other forest sector project activities that may be eligible under the program (e.g., using Verra methodologies). The TAB should not approve a program that does not have mechanisms in place to identify, monitor and fully compensate reversals. The TAB should seek clarity how non-permanence would be addressed for project activities that are not ARR that could be approved under the program.
Gold Standard	Sheet A	Scope Considerations (paragraph 2.2)	Project-based activities that are included within the definition of REDD+ (e.g., REDD, IFM, and ARR) should be nested in jurisdictional REDD+ programs that have high-quality, reference levels--submitted to and assessed by third-party experts. They should be nested in a way that is consistent with the jurisdiction's national plans and NDCs. These project-

			based activities should not be eligible unless a program is able to produce project-by-project details that demonstrate no risk of leakage, equitable benefit sharing, and sufficient measures to avoid double counting.
myclimate	N/A	N/A	The My.Climate website lists projects that are registered under other programs, for which myClimate is listed as the project developer. TAB should consider ineligible all programs that engage in project development because this would present a significant conflict of interest. Moreover, myclimate is not a GHG program and is therefore not eligible under CORSIA. Resolution of our comments in this table cell would therefore not satisfy the eligibility requirements.
myclimate	Sections 3.3, 3.6, 4.1, 4.3 and 4.8	N/A	Sections 3.3, 3.6, 3.8, 3.9, 4.1, 4.3 and 4.8 cite the requirements of other programs (CDM, Gold Standard, Planvivo and FOEN). TAB should not approve any program that cannot produce their own procedures and evidence that the program satisfies the criteria. Note also that the application relies on the rules, procedures and administration of FOEN and Plan Vivo, which have not submitted applications under CORSIA and have therefore not been adequately assessed.
myclimate	Sections 3.5, 3.7, 3.10 and 4.3	N/A	Sections 3.5, 3.7, 3.10 and 4.3 indicate that the program meets the relevant criteria without providing evidence, or summaries of how the criteria are achieved.
myclimate	Section 3.4	Identification and Tracking (paragraph 2.4)	Section 3.4 of the application indicates that the registry and its related processes are not publicly available. Consequentially, it is not possible to independently verify the representations made in this section. This section also indicates that the registry does not adhere to any international data exchange standards, and does not provide evidence that policies are in place to address registry administrator conflict of interests or account screenings and audits. A program is not operational if it has no registry platform. TAB should not approve any program that does not have a publicly available registry or registry procedures.
myclimate	Section 4.1	N/A	Section 4.1 of the application misinterprets the question about over-issuance risk.

myclimate	Section 4.2	Carbon offset credits must be based on a realistic and credible baseline (paragraph 3.2)	Section 4.2 of the application cites project documents as evidence of policies and procedures in place for issuing emissions units against appropriate baselines. Project documentation is not evidence of policies and procedures and TAB should not approve any program that is unable to provide evidence of those policies and procedures.
myclimate	Section 4.5	Permanence (paragraph 3.5)	Section 4.5 of the application states that afforestation and reforestation projects are under Plan Vivo and does not address the subsequent questions regarding risks of reversal. Sheet A includes afforestation and reforestation activities under "CER/CDM" and "CH BAFU". It is not clear whether afforestation and reforestation activities are limited to Plan Vivo. If the activity is not limited to Plan Vivo, the application must describe the procedures in place to address the risk of reversal.
myclimate	Section 4.6	N/A	Section 4.6 of the application states that no sectors supported by the program present a potential risk of leakage. Sheet A includes the afforestation & reforestation sector under Plan Vivo, Gold Standard, and CH BAFU, which may include a risk of leakage.
myclimate	Sheet A	N/A	Sheet A appears to indicate specific projects in the "Supported activity type(s)" column, not activity types.
Nori	Section 3.1	Clear Methodologies and Protocols, and their Development Process (paragraph 2.1)	Section 3.1 of the application states that the first methodology is currently under peer review. TAB should clarify whether this methodology has been finalized and whether the program currently has any eligible means to generate emissions reductions units.
Nori	Section 3.3(b)	Offset Credit Issuance and Retirement Procedures (paragraph 2.3)	Section 3.3(b), procedures related to the duration and renewal of crediting periods, is not addressed in the application. TAB should require the application to address Section 3.3(b).
Nori	Section 3.4	Identification and Tracking (paragraph 2.4)	Section 3.4 of the application indicates that the registry is not publicly available or does not yet exist. Consequentially, it is not possible to independently verify the representations made in this section. This section also incorrectly cites ISO 14064, 14065 and 14080 as

			international data exchange standards, and does not provide evidence that policies are in place to address registry administrator conflict of interests beyond general compliance with regulators. TAB should not approve any program that does not have a publicly available registry or adequate conflict of interest policies.
Nori	Section 3.5	Legal Nature and Transfer of Units (paragraph 2.5)	Section 3.5 of the application does not provide relevant evidence that the program defines and ensures the property aspects of a unit. TAB should not approve any program that does not have publicly available evidence of the legal nature and transfer of units.
Nori	Section 3.6	Validation and Verification procedures (paragraph 2.6)	<p>Section 3.6 indicates that "All Nori CRCs are verified by independent 3rd parties" and that "The verification team must be comprised of individuals who have the necessary skills and competencies to undertake the verification. Verifiers who meet the stated criteria are eligible to apply to Nori through the Nori software to become listed in the Nori marketplace as verifiers." Section 4.1 of the Nori "How it Works" document states that while accredited verification bodies are automatically eligible, non-accredited verifiers may become eligible auditors under the program if they meet the following criteria:</p> <ul style="list-style-type: none"> • Have sufficient proof of identity • Be in a position of fiduciary responsibility • Obtain Errors & Omissions Insurance • Have demonstrated technical expertise in the applicable sectoral scope • Provide one additional contact • Provide two references • Maintain active status by conducting verification in the Nori market at least once every three years <p>The above criteria are inadequate to ensure that eligible verification bodies are qualified to perform validation and verification work. Accreditation is not required under the program and "technical expertise</p>

			in the applicable sectoral scope" is not defined. TAB should not approve any programs that does not have clear and sufficient requirements for the eligibility of validation and verification bodies under the program.
Nori	Section 3.7	Program Governance (paragraph 2.7.2)	Section 3.7 of the application indicates that Nori was incorporated on 30 October 2017 and has been operational since. Part 5 of the application indicates that the program's only methodology has yet to be finalized and the Nori platform is not expected to launch until next year. TAB should not consider a program to be "operational" based on the date of incorporation. A program is not operational if it has no approved methodologies, no registry platform, and no (non-pilot) projects.
Nori	Section 4.1	Carbon offset programs must generate units that represent emissions reductions, avoidance, or removals that are additional (Paragraph 3.1, "Additionality means that the carbon offset credits...exceed any greenhouse gas reductions or removals required by law, regulation, or legally binding mandate")	Section 4.1 of the application states that "Nori does not apply a traditional financial or regulatory additionality test. Nori is designed to be a robust CO2 drawdown market that could encourage local regulation, not impede it." Paragraph 3.1 of the Program Application Form, Appendix A states that "Additionality means that the carbon offset credits 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". TAB should not approve any program that does not apply a regulatory surplus additionality requirement.
Nori	Section 4.1	Carbon offset programs must generate units that represent emissions	Section 4.1 of the application does not provide any information (indicates "N/A") with respect to the following instructions: "Summarize and provide evidence of the availability to the public of relevant policies and procedures, including the criteria used to determine additionality" and

		reductions, avoidance, or removals that are additional (Paragraph 3.1)	"Describe how the procedures described in this section provide a reasonable assurance that the mitigation would not have occurred in the absence of the offset program". The TAB should require sufficiently detailed responses addressing these instructions prior to approving any program.
Nori	Section 4.5	Permanence (paragraph 3.5)	Section 4.5 of the application does not clarify what the minimum scale of reversal is for which the program provisions or measures require a response. TAB should require that the application what the minimum scale of reversal is for which the program provisions or measures require a response.
Nori	Section 4.5	Permanence (paragraph 3.5)	Section 4.5 states that suppliers establish long-term permanence by re-enrolling/re-registering their projects. It is not clear how this establishes permanence, or how permanence is established if a supplier chooses not to re-enroll, or if reversals occur after a project's lifetime or crediting period. TAB should not approve any programs that do not address these scenarios.
Nori	Section 4.5	Permanence (paragraph 3.5)	Section 4.5 states that if credits are found to have been issued in excess, Nori will acquire and retire the volume of the credits required to cover the short-fall. It is not clear how reversals would be compensated in a circumstance where credits are not available in the market to cover the volume of the reversal. TAB should not approve any programs that are not able to demonstrate that their buffer or insurance reserves are designed to cover reversals independent of the credit market.
Nori	Section 4.6	A system must have measures in place to assess and mitigate incidences of material leakage (paragraph 3.6)	Section 4.6 of the application states that leakage is not a significant concern. Section 2.3 of the Nori "How it Works" document states that "If, over time, it becomes apparent that certain carbon removal activities are likely to result in increases in associated GHG emissions, Nori will not permit the registration of these projects in the Nori marketplace" however it is not clear how this would be determined. TAB should not

			approve any programs that do not have procedures in place to monitor and address leakage.
REDD.plus	Section III, Part 1, D	N/A	Section III, Part 1, D of the application states that the "Program Senior Staff / Leadership) information is "attached" but no attachment appears to be included or available. TAB should not consider this application complete without this information.
REDD.plus	Section 3.10 and Section 4.7	Avoidance of Double Counting, Issuance and Claiming (paragraph 2.11)	Part 2 of the application states that "any forestry units generated under voluntary standards, such as the World Bank's FCPF, VCS, GS, CAR, ACR, Plan Vivo, etc. are not REDD+ by definition as they do not fulfill the necessary requirements outlined within relevant UNFCCC decisions. Thus, unless such units have been canceled and exchanged for REDD.plus results units (RRUs) under REDD.plus they will effectively be double counted and fail to meet CORSIA environmental safeguards." We recommend that programs avoid double counting by adhering to the guidance in Version 1.0 of the Guidelines on Avoiding Double Counting for the Carbon Offsetting and Reduction Scheme for International Aviation . The Guidelines were developed through a multi-stakeholder consensus decision-making process, by a working group consisting of representatives of the American Carbon Registry, Carbon Market Watch, Climate Action Reserve, Environmental Defense Fund, the Gold Standard Foundation, the International Emissions Trading Association, Verra, and the World Wildlife Fund, with critical input from outside experts. The Guidelines are a first version. They may be updated in the future considering any new SARPs adopted or amended under ICAO or any decisions adopted by the CMA, in order to support consistency between these Guidelines and decisions under ICAO and the Paris Agreement.
REDD.plus	Section 3.3	Offset Credit Issuance and Retirement Procedures (paragraph 2.3)	Section 3.3 of the application indicates that the offset credit issuance and retirement procedures are not publicly available. The linked registry terms and conditions do not substitute for program procedures. TAB should not consider an application complete if it does not provide a summary or evidence of procedures that the application indicates are in place.

REDD.plus	Section 3.4	Identification and Tracking (paragraph 2.4)	Section 3.4 does not include a web link to the program registry. Rather, the link is to a generic webpage of the REDD.plus registry's third-party provider. TAB should not consider this application complete if it does not provide a link to the program registry.
REDD.plus	Section 3.4	Identification and Tracking (paragraph 2.4)	Section 3.4 of the application represents that the program registry adheres to the capabilities identified in (a)-(e). The evidence provided is limited to a webpage of the IHS Markit public registry webpage which contains a database of programs with registries provided by IHS Markit. It is not clear which, if any, of those programs is REDD.plus, as none are identified under that name. Evidence that other programs using an IHS Markit registry that meets the capabilities identified in (a)-(e) is not evidence that those capabilities are applied in the REDD.plus registry. TAB should not consider an application complete if it does not provide evidence of registry capabilities that the application indicates are in place.
REDD.plus	Section 3.4	Identification and Tracking (paragraph 2.4)	Section 3.4 does not indicate any specific international data exchange standards to which the program registry conforms. TAB should not consider this application complete until clarification is provided.
REDD.plus	Section 3.4	Registry administrator conflicts of interest (paragraph 2.4.6)	Section 3.4 indicates that there are policies in place to prevent the program registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services. As evidence, the application directs to the IHS Markit terms and conditions for registry accounts. These terms set out the terms on which Markit offers to make the Markit Environmental Registry ("Markit Registry") available to the Account Holder and does not address conflict of interest policies applied by IHS Markit or the program registry administrator. TAB should clarify (1) who is administering the REDD.plus program registry (e.g. is it the registry provider IHS Markit?) and (2) whether and where policies exist to prevent the program registry administrators from having conflicts of interest.
REDD.plus	Section 3.5	Legal Nature and Transfer of Units (paragraph 2.5)	Section 3.5 enquires whether the program has policies and procedures in place regarding the legal nature and transfer of units. The application states that "REDD.plus and IHS Markit's policies regarding legal title to

			units is outlined in our terms and conditions: https://cdn.ihs.com/www/pdf/MER-Terms-and-Conditions-Account-Guidelines.pdf ." The IHS Markit terms and conditions speak only to the registry provider, IHS Markit's, guarantees, including that: "the Account Holder acknowledges and agrees that Markit does not in any way guarantee legal title to the Units and the Account Holder relies on any content obtained through the Markit Registry at its own risk. For the avoidance of doubt, Markit is under no obligation to verify or otherwise enquire into the validity of, or legal title to, the Units." The legal nature and transfer of units should be addressed by the program, not the provider of the registry infrastructure, and the application does not sufficiently provide this information. TAB should not approve any program that does not have policies and procedures in place regarding the legal nature and transfer of credits.
REDD.plus	Section 3.7	Program Governance (paragraph 2.7.2)	Section 3.7 of the application indicates that the program has a plan for the long-term administration of multi-decadal program elements. The application provides no evidence of this, instead stating that "The REDD+ programme is voluntary and the Paris Agreement, an international treaty otherwise decided by the Parties to it." It is therefore not clear whether there is a plan for the long-term administration of the program and/or its dissolution.
REDD.plus	Section 4.3	Carbon offset credits must be quantified, monitored, reported, and verified (paragraph 3.3) and Auditor conflicts of interest (paragraph 3.3.3)	Section 4.3 (a) ("emissions units are based on accurate measurements and valid quantification methods/protocols? (Paragraph 3.3)") and Section 4.3 (a) ("Are provisions in place to manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures, and the Program and the activities it supports?") of the application does not include a "YES"/"NO"/"N/A" response. TAB should not consider this application complete until a response is provided for Section 4.3(a).
REDD.plus	Section 4.3	Re-evaluation of assumptions (paragraph 3.3.4)	Section 4.3 of the application doesn't include evidence of the relevant policies and procedures for the following question: "Are procedures in place requiring that renewal of any activity at the end of its crediting period includes a reevaluation and update of baseline? (Paragraph

			3.3.4)". TAB should not consider an application complete if it does not provide a summary or evidence of procedures that the application indicates are in place.
REDD.plus	Section 4.5	Permanence (paragraph 3.5)	Section 4.5 enquires about procedures, provisions, and capabilities in place to address paragraphs 3.5.2 to 3.5.6. The application indicates that all of procedures, provisions, and capabilities are in place to address these paragraphs, but evidence cited states "See above". It is not clear which evidences are cited in this response, and none of the previous evidences listed in the application specifically address procedures, provisions, and capabilities for these paragraphs. TAB should clarify to which evidence this section of the application is references and request that evidence specific to these paragraphs be addressed and provided.
REDD.plus	Section 4.6	A system must have measures in place to assess and mitigate incidences of material leakage (paragraph 3.6)	Section 4.6 states that the activities supported by the REDD.plus program are not at risk of material emissions leakage but indicates that procedures are in place to monitor and address leakage. Jurisdictional REDD+ programs are at risk of material leakage. TAB should request that the application elaborate on why it does not consider its program to include activities at risk of material emissions leakage.
Thailand Greenhouse Gas Management Organization	Section 3.6	Validation and Verification procedures (paragraph 2.6)	Section 3.6 indicates that "Currently, the Validation and Verification Body (VVB) are registered by TGO but from October 2019, the VVB shall be accredited by National Accreditation Body." From this statement, it is not clear whether or which units from the program have been verified by an accredited and independent third-party verification entity. Section 4.1 of the application indicates "Yes" to the question whether additionality and baseline-setting is assessed by an accredited and independent third-party verification entity, but the summary and evidence provided in elaboration to this response does not clarify the above. Section 4.3(e) indicates that "verification has to be conducted by third-party verification entity" but does not explain whether that entity is accredited.
Thailand Greenhouse Gas	Section 3.7(b)	Program Longevity (paragraph 2.7.2)	In Section 3.7(b), the application does not describe how the program would respond to its own dissolution, or otherwise provide evidence of relevant policies and procedures, stating instead that plans entail the use

Management Organization			of T-VER "for offsetting in ETS in the future". It is therefore not clear whether there is a plan for the long-term administration of the program and/or its dissolution.
Thailand Greenhouse Gas Management Organization	Section 3.7(b)	Program administrator and staff conflicts of interest (paragraph 2.7.3)	In Section 3.7(b), the application does not indicate whether there are "policies in place to prevent the Program staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of program services."
Thailand Greenhouse Gas Management Organization	Section 3.7(b)	Liability coverage (paragraph 2.7.4)	In Section 3.7(b), the application does not indicate whether the Program can "demonstrate up-to-date professional liability insurance policy of at least USD\$5M" or whether such is relevant.
Thailand Greenhouse Gas Management Organization	Sections 3.8(b) and (c)	Transparency and Public Participation Provisions (paragraph 2.8)	In Sections 3.8(b) and (c), the application does not indicate whether the program publicly discloses its local stakeholder consultation requirements or public comments provisions and requirements, or whether the program conducts public comment periods. This is not consistent with the spirit of Program Design Element 8, Transparency and Public Participation Provisions and should be clarified.
Thailand Greenhouse Gas Management Organization	Section 4.1	Carbon offset programs must generate units that represent emissions reductions, avoidance, or removals that are additional (paragraph 3.1)	In Section 4.1, the application does not indicate whether the program utilizes one or more of the additionality methods cited in Paragraph 3.1.2 and does not provide an explanation for not indicating such.
Thailand Greenhouse Gas Management Organization	Section 4.3(c)	Re-evaluation of assumptions (paragraph 3.3.4)	In Section 4.3(c), the application does not indicate whether provisions are in place requiring that renewal of any activity at the end of its crediting period includes a reevaluation and update of baseline or otherwise explain why the application provides no indication of this.

Thailand Greenhouse Gas Management Organization	Section 4.3(c)	Identification of units issued ex ante (paragraph 3.3.5)	In Section 4.3(c), the application does not indicate whether there are procedures in place to transparently identify units that are issued ex-ante and thus ineligible for use in the CORSIA, or otherwise explain why the application provides no indication of this.
Thailand Greenhouse Gas Management Organization	Section 4.6	A system must have measures in place to assess and mitigate incidences of material leakage (paragraph 3.6)	In Section 4.6, the application does not summarize and provide evidence of the relevant policies and procedures related to leakage control. Rather, the application appears to state that conditions possibly leading to leakage would render specific project activities ineligible under their respective methodologies. However, this is not entirely clear and should be confirmed and elaborated according to the specific application questions in this section.
Thailand Greenhouse Gas Management Organization	Section 4.8	Carbon offset credits must represent emissions reductions, avoidance, or carbon sequestration from projects that do no net harm (paragraph 3.8)	In Section 4.8, the application does not provide evidence that the program complies with social and environmental safeguards, or publicly discloses the institutions, processes, and procedures related to environmental and social risks.
The State Forests of the Republic of	Sheet A	Scope Considerations (paragraph 2.2)	Project-based activities that are included within the definition of REDD+ (e.g., REDD, IFM, and ARR) should be nested in jurisdictional REDD+ programs that have high-quality, reference levels--submitted to and assessed by third-party experts. They should be nested in a way that is consistent with the jurisdiction's national plans and NDCs. These project-based activities should not be eligible unless a program is able to produce project-by-project details that demonstrate no risk of leakage, equitable benefit sharing, and sufficient measures to avoid double counting.
The State Forests of the Republic of Poland	Section 3.1	Clear Methodologies and Protocols, and their Development	Section 3.1 does not clearly describe the process for developing and approving new methodologies. The application should clarify whether there is an established process.

		Process (paragraph 2.1)	Section 3.3 of the application seems to misinterpret the application form's usage of the term "discounting" to reference discounted price. The TAB should clarify the intent of this question and request further response.
The State Forests of the Republic of Poland	Section 3.4	Identification and Tracking (paragraph 2.4)	The summary responses provided in Section 3.4 do not appear to specifically pertain to, or otherwise sufficiently address, any of the application form's questions. The TAB should seek responses that sufficiently address the questions in the application.
The State Forests of the Republic of Poland	Section 3.5	Legal Nature and Transfer of Units (paragraph 2.5)	The summary response in Section 3.5 appears to reference separate bylaws as evidence of addressing the legal nature and transfer of units but it is not clear what bylaws this is referencing. The TAB should seek clarity.
The State Forests of the Republic of Poland	Section 3.6	Validation and Verification procedures (paragraph 2.6)	Section 3.6 of application does not specify which standards and procedures are in place for validation and verification. The TAB should not approve a program without such procedures in place.
The State Forests of the Republic of Poland	Section 3.7	Program Governance (paragraph 2.7)	Section 3.7 of the application does not sufficiently represent who is responsible for the administration of the program and how decisions are made. TAB should not approve a program without establishing who is responsible for administration of the program and should require clarity on this question. Where external documentation is referenced, that documentation should be provided, or the application should clarify where that documentation is easily accessible.
The State Forests of the Republic of Poland	Section 3.8	Transparency and Public Participation Provisions (paragraph 2.8)	Section 3.8 does not provide sufficient or positive responses to the questions. TAB should not approve a program that does not provide sufficient or positive responses to these questions.
The State Forests of the Republic of Poland	Section 3.10	Sustainable Development Criteria (paragraph 2.10)	Section 3.10 does not describe provisions for monitoring, reporting and verifying in accordance with sustainable development criteria. TAB should clarify this response.

The State Forests of the Republic of Poland	Section 4.1	Carbon offset programs must generate units that represent emissions reductions, avoidance, or removals that are additional (paragraph 3.1)	The summary responses provided in Section 4.1 do not address any of the specific questions in this section. TAB should not approve any program which does not address the specific questions in the application.
The State Forests of the Republic of Poland	Section 4.2	Carbon offset credits must be based on a realistic and credible baseline (paragraph 3.2) and Conservative baseline estimation (paragraph 3.2.2)	The summary responses provided in Section 4.2 pertaining to Paragraph 3.2 and 3.2.2 do not address the specific questions in this section. TAB should not approve any program which does not address the specific questions in the application.
The State Forests of the Republic of Poland	Section 4.3	Carbon offset credits must be quantified, monitored, reported, and verified (paragraph 3.3)	The summary responses provided in Section 4.3 do not address the specific questions in this section or otherwise do not support summary statements with evidence of relevant policies and procedures. TAB should not approve any program which does not address the specific questions in the application or otherwise does not include evidence of relevant policies and procedures.
The State Forests of the Republic of Poland	Section 4.5	Permanence (paragraph 3.5)	Section 4.5 does not appear to accurately characterize the risk of reversal for the emissions sectors included in the program and does not sufficiently describe the relevant policies and procedures relevant to the questions in this section. TAB should seek clarity on the intent of the response in Section 4.5.
The State Forests of the Republic of Poland	Section 4.6	A system must have measures in place to assess and mitigate incidence of material	In Section 4.6 it is not clear whether the application should read "N/A" or "Yes" for the questions. TAB should seek clarity on the intent of these responses.

		leakage (paragraph 3.6)	
The State Forests of the Republic of Poland	Section 4.8	Carbon offset credits must represent emissions reductions, avoidance, or carbon sequestration from projects that do no net harm (paragraph 3.8)	Section 4.8 of the application does not provide evidence with respect to Paragraph 3.8. TAB should seek clarity on these responses.
Verified Carbon Standard	Appendix A	Scope Considerations (paragraph 2.2)	Project-based activities that are included within the definition of REDD+ (e.g., REDD, IFM, and ARR) should be nested in jurisdictional REDD+ programs that have high-quality, reference levels--submitted to and assessed by third-party experts. They should be nested in a way that is consistent with the jurisdiction's national plans and NDCs. These project-based activities should not be eligible unless a program is able to produce project-by-project details that demonstrate no risk of leakage, equitable benefit sharing, and sufficient measures to avoid double counting.
Verified Carbon Standard	Appendix B	Scope Considerations (paragraph 2.2)	The application includes for consideration standalone project-based activities that it describes as "typically not included in a jurisdiction's Forest Reference Emission Level (FREL) (i.e., ARR, WRC, ALM, and ACoGS)", as long as the projects demonstrate no material leakage risk. In principle, project types not included in a jurisdiction's FREL should only be eligible where a program is able to produce project-by-project details that demonstrate no leakage risk, equitable benefit sharing, and sufficient measures to avoid double counting. However, it is unclear whether such projects would be eligible without nesting given the wording of the "3.6.2 Scope and leakage prevention"—a "guideline for interpretation" in Program Application Form, Appendix A. TAB should also require that each applying program have procedures in place to

			identify which projects activities are or have a high likelihood of being in a FREL.
Verified Carbon Standard	Appendix B	Scope Considerations (paragraph 2.2)	The application excludes from consideration some land sector project activities and not others. If such would be approved, TAB should consider and clarify how single projects that apply both eligible and ineligible project activities would be treated under CORSIA.
Verified Carbon Standard	Section 3.1	Clear methodologies and protocols, and their development process (paragraph 3.1)	The rigor and appropriate application of a methodology may depend on program-specific rules and requirements (e.g., VCS program Ozone Depleting Substance (ODS) methodologies are supplemented with a separate ODS-specific rules document). Where a methodology is applied under a different program than the one under which it was developed, there is a risk that the adopting program has not taken into full consideration how the methodology's integrity may rely on program-specific rules that it has not likewise adopted. Where an application indicates that the program has approved the use of methodologies or protocols developed under a different program, the TAB should require proof that the program has performed a rigorous assessment to demonstrate that those methodologies are appropriate for the applying program to adopt.

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Comment Set #11

Name:

Lambert Schneider⁽¹⁾, Anne Simons⁽¹⁾, Derik Broekhoff⁽²⁾

Organization:

⁽¹⁾ Oeko-Institut

⁽²⁾ Stockholm Environment Institute

Date of receipt:

5 September 2019

From: Lambert Schneider <L.Schneider@oeko.de>
Sent: 5-Sep-19 15:54
To: Office of the Environment
Cc: Derik Broekhoff; Anne Siemons
Subject: Comments on CORSIA program applications
Attachments: TAB Comments by Oeko-Institut and SEI - 5 September 2019.pdf

Dear Sir or Madam,

I refer to the call for public inputs on program applications for CORSIA and hereby submit joint comments on behalf of Oeko-Institut and Stockholm Environment Institute. Please confirm the receipt of these comments.

Should you have any questions regarding our comments, please do not hesitate to contact me.

Best regards,

Lambert Schneider

Lambert Schneider
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TAB Public Comment Template Form

The public is invited to submit comments on the responses to the call for applications, including regarding their alignment with the emissions units criteria (EUC).

The public is requested to use this form to provide structured comments on the responses to the call for applications that were submitted for assessment by the TAB. Public comments regarding the information submitted may be published online, along with the commenter name and organization.

Commenter Name: Lambert Schneider (Oeko-Institut), Anne Simons (Oeko-Institut), Derik Broekhoff (Stockholm Environment Institute)

Commenter Organization: Oeko-Institut / Stockholm Environment Institute

Note: The following abbreviations are used for programs:

- American Carbon Registry (ACR)
- British Columbia Offset Program (BCOP)
- China GHG Voluntary Emission Reduction Program (CCER)
- Clean Development Mechanism (CDM)
- Climate Action Reserve (CAR)
- Forest Carbon Partnership Facility (FCPF)
- Global Carbon Trust (GCT)
- Gold Standard (GS)
- myclimate (myclimate)
- Nori (Nori)
- REDD.plus (REDD.plus)
- Thailand Greenhouse Gas Management Organization (TGO)
- The State Forests of the Republic of Poland (SFP)
- VCS Program managed by Verra (VCS)

Some comments provided below apply equally to several programs. In this case, the relevant programs are listed in the first column of the table. For simplicity, in such cases no separate comments are provided on each program.

The comments provided in this document are partially based on the [Guidelines on Avoiding Double Counting for CORSIA](#) which were developed by a multi-stakeholder working group (www.adc-wg.org), consisting of carbon-offsetting programs, non-governmental organizations and the International Emissions Trading Association (IETA). The Guidelines aim to help carbon-offsetting programs in implementing standards and procedures to avoid double counting for CORSIA. All four working group members (ACR, CAR, GS and VCS) have also applied to become CORSIA eligible programs. Three out of these four programs (ACR, CAR, GS) explicitly refer to these Guidelines; the VCS does not refer to them but informed the authors that it intends to apply the Guidelines as well. In their applications, not all of the programs are clear whether they intend to apply the Guidelines in its entirety. It would be helpful if this is clarified, and we therefore provide a comment in this regard. In commenting below, however, we assume that all four programs (ACR, CAR, GS and VCS) will implement and incorporate the Guidelines in their standards and procedures in their entirety.

Please also note that our evaluation of the programs raised some broader governance questions in relation to CORSIA. We understand that the main purpose of this public consultation is seeking feedback on the program applications. However, it is difficult to evaluate the programs if some broader governance questions have not been clarified. We therefore also provide a few broader comments in the first section of the document that do not relate to specific programs, but the process of program evaluation and approval.

Finally, please note that two of the individuals providing comments here have affiliations with some of the programs under consideration. Lambert Schneider (Oeko-Institute) is as a member of the CDM Executive Board and also serves on the VCS Program Advisory Group (part of Verra). Derik Broekhoff (SEI) was formerly the Vice President for Policy at the Climate Action Reserve (CAR). Within this document, SEI takes sole responsibility for comments specifically referencing the CDM and VCS/Verra, while Oeko-Institute is solely responsible for comments specifically referencing CAR.

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Cross-cutting comments on the application process (not specific to any program)			
Cross-cutting issue (not specific to any program)	Cross-cutting issue / All section	Cross-cutting issue / All aspects	Timing of approving programs as CORSIA eligible. None of the programs have standards and procedures in place that address all EUCs. This holds in particular for the avoidance of double counting in the new context of CORSIA and the Paris Agreement. This is clear given the timing of the adoption of the EUCs by the ICAO Council, just

			<p>recently in February 2019, and the new context of CORSIA and the Paris Agreement. Many programs specify that they will address these issues in the future. However, the applications are not always clear how these issues will be addressed. Moreover, we believe that “plans” should not be the basis for an ultimate approval of a program by ICAO. For example, if a program announced in its application that it will incorporate in its procedures a requirement to obtain a host country attestation, but later – after approval by ICAO – does not include such a requirement, the use of offset credits from the program could seriously undermine the integrity of CORSIA. Plans may also change, for very good reasons, as often new issues are identified when developing the actual revisions of relevant program documents.</p> <p>For these reasons, we believe it is essential that programs are only approved by the ICAO Council as CORSIA eligible after they have adopted all necessary amendments to their standards, procedures, guidelines, forms and program operations, and only after these amendments have been assessed by the TAB.</p> <p>We recognize that this raises some timing issues, as amendments to standards and procedures that specifically target CORSIA should only become effective once the program is CORSIA eligible. A possible approach to address this issue could be that programs adopt any necessary amendments to their standards and procedures before the final assessment by the TAB and approval by the ICAO Council, but confirm the date of their effectiveness or entry into force only following a final decision by the ICAO Council on the eligibility of the program. It is common practice with carbon offsetting programs that revisions to program documents only enter into force at a future date.</p>
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Cross-cutting issue (not specific to any program)	Cross-cutting issue / All section	Cross-cutting issue / All aspects	<p>Duration of approval and treatment of future revisions of program documents. There is no information available for how long programs will be approved as CORSIA eligible and how any future revisions to program requirements will be handled. For example, after initial approval, a program could adopt revisions to its requirements and may, due to these revisions, no longer satisfy the EUCs.</p> <p>To address these challenges, we recommend that programs are approved for a limited duration and are re-assessed by the TAB and re-approved by the ICAO Council prior to the end of the first eligibility period. Furthermore, we recommend establishing a procedure to address future revisions to program requirements. This procedure needs to be simple - as programs frequently amend their requirements - but at the same time sufficient to address the risk that revisions do not undermine the ability of the program to fulfil the EUCs. Possibly, programs could be required to annually notify the TAB about changes implemented in the last year and how these ensure that the EUCs are still met. The TAB could take note of this, or seek further information, or if it concludes that the program no longer meets the EUCs, request the program to implement changes, or otherwise suspend or terminate the eligibility of the program.</p> <p>We recommend that the TAB develops a clear and transparent procedure for the initial establishment of program eligibility, the subsequent continuous surveillance of the program in relation to its performance against the EUCs, as well as procedures for suspension or termination of program eligibility. This procedure should be publicly available and public comments should be invited to the procedures prior to its final adoption.</p>
Cross-cutting issue (not specific	Cross-cutting issue / All section	Cross-cutting issue / All aspects	<p>Lack of sufficient information to inform public comments. For some programs, it is not clear how they plan to fulfil the EUCs, in particular</p>

to any program)			<p>with regard to avoiding double counting. Some programs do not include any substantive information on how they plan to meet a criterion, other programs include some information, but with the available information it is not possible to assess whether the criterion will be satisfied. It seems obvious that further information needs to be provided by the programs.</p> <p>We call on the TAB to make publicly available any further information provided by the applicants in the course of the application process. Given that for many programs the current information is not sufficient to provide substantive comments, we also recommend that a second call for public comments be launched. It may be most effective to schedule this second call for public inputs for each applicant separately, and to launch the call once the program has prepared a draft amendment to its standards and procedures in order to satisfy the EUCs. This would constitute a meaningful basis for providing public comments.</p>
Cross-cutting issue (not specific to any program)	Cross-cutting issue / All section	Cross-cutting issue / All aspects	<p>Lack of guidance on values for global warming potentials (GWPs). ICAO has not established a requirement regarding which GWP values programs should use to convert non-CO₂ emission reductions/removals into CO₂ equivalents. The CORSIA State Letter refers to GWPs only in the context of life cycle assessments for sustainable fuels. In this context, the 100-year values from the 5th IPCC assessment report should be used, but there is no clear guidance whether the same values should be used by carbon-offsetting programs.</p> <p>If different programs use different sets of GWP values under CORSIA, this could have at least two adverse impacts. First, this could create a risk that project owners pick the program which results in higher CO₂ equivalents of emission reductions, depending on which gases are</p>

			<p>abated. In aggregate, this could lead to higher emission reduction claims compared to a situation where all programs use the same GWP values. Second, as the same emission reduction would have a different value under different programs, this could distort the market. The Guidelines on Avoiding Double Counting for CORSIA therefore recommend that all CORSIA eligible programs use the same GWP values, taking into account relevant decisions under the UNFCCC.</p> <p>We recommend that the ICAO clarifies which GWP values programs should use for which relevant time periods (up to 31 December 2020 and as of 1 January 2021). Following relevant decisions under the Kyoto Protocol and the Paris Agreement, as well as the Guidelines on Avoiding Double Counting for CORSIA, we recommend that the following GWP values be used by all programs that intend to become CORSIA eligible:</p> <ol style="list-style-type: none"> 1. The 100-year time-horizon values from the 4th assessment report of the Intergovernmental Panel on Climate Change (IPCC) for emission reductions or removals that occur before 1 January 2021 (if such emission reductions are deemed eligible in accordance with relevant decisions on vintage and timeframe); 2. The 100-year time-horizon values from the 5th assessment report of the IPCC for emission reductions or removals that occur on or after 1 January 2021 or, if applicable, any other common GWP values adopted for future periods in relevant decisions by the CMA.
General comments to program applications (applicable to all sections of the application form)			
myclimate	All sections	All paragraphs	Myclimate is a project developer rather than a carbon-offsetting program. We note that myclimate is an entity that develops climate mitigation projects and draws upon other programs for registering projects and issuing offset credits. Myclimate does not have its own

			<p>procedures and standards for registering projects and issuing offset credits. The application mainly refers to relevant programs that myclimate uses. As such, we do not deem myclimate to be a program that is eligible for application and do not further comment on this application.</p> <p>Please also note that not all programs referred to by myclimate have applied to become eligible programs in this first call by the TAB.</p>
REDD.plus	All sections	All paragraphs	<p>REDD.plus seems to be a registry and trading platform rather than a carbon-offsetting program. We similarly note that REDD.plus appears to maintain a registry (operated by IHS Markit) in conjunction with a trading platform intended to facilitate trading of UN-certified REDD+ credits (which, however, do not yet exist). It does not have its own procedures and standards for registering projects (or jurisdictional REDD+ programmes) and issuing offset credits. The application mainly refers to sections of international agreements providing guidelines and safeguards related to REDD+ efforts, which currently do <i>not</i> address offsetting or emissions trading requirements (e.g., as would be applied under Article 6 of the Paris Agreement). We therefore do not deem REDD.plus to be a carbon offsetting program eligible for application, and do not further comment on this application.</p> <p>We also note that the website of REDD.plus only includes one link to "contact" information and further information about this entity is lacking. The website also provides wrong information about the Warsaw Framework by referring to "UN approved, REDD+ carbon credits". Such credits do not exist.</p>
SFP	All sections	All paragraphs	<p>The State Forests of the Republic of Poland (SFP) does not seem to be a carbon-offsetting program. We similarly note that SFP also does not have any procedures and standards for registering activities and</p>

			<p>issuance of offset credits and does not operate a registry. We therefore deem that this initiative is also not a carbon-offsetting program and do not further comment on this application, except in specific circumstances that only apply to SFP.</p>
<p>BC, CCER, CDM, FCPF, GCT, Nori, TGO</p>	<p>All sections</p>	<p>All aspects</p>	<p>Lack of a procedure to qualify offset credits for use under CORSIA. Offset credits issued by the programs are often used for multiple purposes. In some instances, these different uses may involve different requirements. Not all offset credits issued by a program may satisfy all CORSIA requirements (e.g. because meeting such requirements is not necessary for their use outside of CORSIA). Some programs also applied with a limited scope and exclude certain activities. Some programs have already issued offset credits that do not satisfy CORSIA requirements. Some programs are not fully clear in their application whether they intend to issue offset credits that do not satisfy CORSIA requirements. In all these cases, offset credits for which all CORSIA requirements have been met should be clearly identified as such.</p> <p>All programs listed here do not explain how they will distinguish units that satisfy all CORSIA requirements from those that do not satisfy CORSIA requirements. Some other programs have explicit procedures for this. The GS, for example, explains in its application that it will introduce a procedure “to allow interested project owners or offset credit holders to make a formal request to Gold Standard to request that offset credits be qualified for meeting offsetting requirements under the CORSIA”.</p> <p>To address this issue, we recommend that programs that intend to issue, or have already issued, offset credits for which not all EUCs and other relevant decisions under ICAO (such as on the eligible vintage and timeframe of offset credits) are initially satisfied establish a</p>

			<p>procedure under which project owners or offset credit holders can request that offset credits be qualified for meeting offsetting requirements under the CORSIA. This procedure should clearly specify which substantive requirements must be satisfied for offset credits to be qualified. Programs could establish certain minimum requirements that all projects have to satisfy in order to be issued offset credits, and additional requirements that must be satisfied in order for offset credits to be qualified by the program for use under CORSIA. The requirements arising from the CORSIA Eligible Emissions Unit Criteria could partially belong to the minimum requirements applicable to all offsets issued by the program and partially to the specific additional requirements needed to qualify an offset credit for use under CORSIA. The procedure should ensure that offset credits are not qualified by a program for use under CORSIA unless all CORSIA-related program requirements have been satisfied. The fulfilment of program requirements should be demonstrated through appropriate supporting documentation that is made publicly available. See further guidance in section II.8 of the Guidelines on Avoiding Double Counting for CORSIA.</p>
Comments relating to addressing non-permanence			
ACR, BC, CAR, FCPF, GS, Nori, VCS	Section 4.5	All paragraphs	<p>Use of buffer reserves to address permanence. Because offset credits will be used to compensate for emissions that will effectively raise atmospheric concentrations of CO₂ for many thousands of years, they should be associated with emission <i>reductions</i> that are similarly permanent. If an emission reduction or removal is “reversed” (e.g., subsequently emitted so that no net reduction occurs), then it can no longer function as an offset. The CORSIA EUCs imply that offsetting emission reductions must be truly permanent: <i>“Carbon offset credits must represent emissions reductions, avoidance, or carbon sequestration that are permanent.”</i></p>

			<p>Several of the programs that submitted applications use different versions of a pooled “buffer reserve” approach to address the risk of reversals. Under this approach, offset credits are set aside from individual projects into a common buffer reserve, which can be drawn upon to cover reversals from any project. Programs adopting this approach include ACR, BC, CAR, FCPF, GS, and VCS. Nori applies a limited form of project-specific buffering. The CDM addresses permanence through temporary (expiring) credits (though it does not detail this approach in its application). The remaining applicants do not indicate any specific requirements or provisions related to maintaining permanence.</p> <p>Although buffer reserves are a common mechanism for addressing permanence, they have some potential shortcomings:</p> <ol style="list-style-type: none"> 1. They only guarantee permanence for a limited time period 2. They are not sufficient to address the risk of intentional, human-caused reversals 3. They must be sufficiently “capitalized” to cover reversal risks over time <p>Each of these points is addressed in more detailed comments below, indicating specific programs for which these issues may be a particular concern.</p>
ACR, FCPF, GS, Nori, VCS	Section 4.5	All paragraphs	<p>Insufficient length of permanence guarantees. No risk can be insured against in perpetuity, including reversal risks (over the very long run, the chance of reversal for any given project approaches 100%). Programs adopting buffer reserves are therefore implicitly or explicitly transferring an obligation to maintain carbon storage (or compensate for reversals) to future decisionmakers (Murray et al. 2012). From a policy standpoint, the question is what sort of</p>

			<p><i>minimum guarantee</i> is sufficient to deem an emission reduction “permanent.” As a convention, international policymakers have adopted 100 years as a standard benchmark for evaluating the climate impacts of mitigation actions (Fearnside 2002). This is the basis, for example, for using 100-year global warming potentials (GWPs) to convert quantities of non-CO₂ emissions into CO₂-equivalent emissions. The same benchmark should be used for evaluating the “permanence” of carbon offsets used by the aviation industry. However, only two of the programs that submitted applications – BC and CAR – provide a minimum guarantee of compensating for reversals for 100 years or more. Other programs guarantee permanence for shorter periods of time (sometimes far shorter), have shorter monitoring periods, and/or are vague about their guarantees. Specifically:</p> <ul style="list-style-type: none"> · ACR ensures compensation for reversals only through the end of a project’s lifetime, which may be as low as 40 years (the “Minimum Project Term”). For geologic sequestration projects, a “Risk Mitigation Covenant” helps ensure against post-project reversals. However, there does not appear to be a similar covenant required for AFOLU projects. · The FCPF implements buffer reserves specific to each of the jurisdictional REDD+ programs it funds, as well as a pooled buffer to cover catastrophic reversals risks. The terms of FCPF emission-reduction purchase agreements (ERPAs), however, provide for compensation of reversals only during a REDD+ program’s first crediting period. These are typically 4+ years, but in no case will go beyond the lifetime of the FCPF Carbon Fund (currently expected to be through 2025). Funded REDD+ programs are required to have a “robust Reversal management mechanism” in place that addresses “the risk of Reversals after the term of the
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			<p>ERPA.” However, the FCFP offers few details on what such mechanisms could or should look like. This presents significant uncertainties about how permanence will be maintained after 2025, including – for example - whether the FCPF’s program-specific and pooled buffer reserves will be maintained.</p> <ul style="list-style-type: none"> • As noted above, Nori only compensates for reversals (in a limited fashion) for a period of 10 years after a project’s last crediting period. • The Gold Standard does not indicate for how long monitoring and compensation for reversals must be carried out. According to program documentation, A/R projects have a minimum crediting period of 30 years and a maximum of 50 years. Although buffer reserve credits are not returned to projects at the end of a project, the Gold Standard provides no estimate of how long permanence can be ensured past the end of a project’s crediting period. Unlike the BC Offset Program and CAR, there do not appear to be requirements for ongoing (post-crediting period) monitoring and compensation. • The VCS requires active monitoring and compensation for reversals only through the end of a project’s final crediting period; AFOLU projects may have lifetimes as short as 20 years. Although VCS buffer reserves may offer some insurance against reversals after a project terminates, no evidence is provided for how long this compensation could last, or how it would operate without ongoing monitoring. <p>We recommend that programs are only approved as CORSIA-eligible if their procedures and standards ensure permanence for 100 years or more. This includes that monitoring of any reversals should continue throughout this period and that appropriate mechanisms are in place to compensate for potential reversal if monitoring is no</p>
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			longer conducted.
Nori, VCS	Section 4.5	Paragraph 3.5.5	<p>Failure to sufficiently address risk of intentional reversals. Buffer reserves can be effective at compensating for reversals due to natural disturbance risks, such as fire, disease, or drought affecting forests and soils. They can present a “moral hazard” problem, however, if used to compensate for human-caused reversals, such as intentional harvesting. If a landowner faces no penalty for harvesting trees for their timber value, for example – because any reversals caused by harvesting would be compensated out of a buffer reserve – then the landowner could face a strong incentive to harvest. Such perverse incentives can make a buffer reserve approach unviable, unless programs use alternative mechanisms or penalties to cover “intentional” or “avoidable” reversals. At least two of the applying programs – Nori and VCS – either do not explicitly address this distinction, or apply approaches that are insufficient to address the “moral hazard” problem:</p> <ul style="list-style-type: none"> • Nori fails to apply any direct liability for reversals and therefore creates a moral hazard for suppliers. In theory, a supplier could decide to receive credits for a period of time, then allow their land to be developed in a way that releases all credited carbon. The supplier would face no penalty for this. Although Nori maintains an “insurance reserve pool” of tokens with which it could compensate for such intentional reversals (noted in its online materials), it fails to address the moral hazard created by not imposing any liability on suppliers or buyers. • The VCS covers “non-catastrophic” reversals (e.g., due to poor management or over-harvesting) out of its buffer reserve, but will not issue further offset credits to a project until the reversal is remedied. This is similar to Nori’s approach, and provides some

			<p>disincentive against intentional reversals. However, by not imposing any immediate liability, project developers may still abandon projects without further consequence. If project monitoring ceases, the VCS commits to compensating for all VCUs issued to a project from its buffer reserve – in principle allowing intentional reversals to be fully covered.* If early cessation of projects becomes widespread, however, this commitment could lead to failure of the VCS buffer reserve.</p> <p>We recommend that programs are only approved as CORSIA eligible if they have procedures in place to address the “moral hazard” risk, as otherwise there is a significant risk that buffer reserves may not be sufficient to compensate for non-permanence.</p> <p>* VCS AFOLU projects are also required to “put in place management systems to ensure the carbon against which VCUs are issued is not lost during a final cut with no subsequent replanting or regeneration.”</p>
ACR, BC , CAR, FCPF, GS, Nori, VCS	Section 4.5	Paragraph 3.5.7	<p>Uncertain sufficiency of buffer reserves. As with any kind of insurance, buffer reserves can only be effective at guaranteeing permanence if they are sufficiently “capitalized” to cover reversal risks over time. Only two of the applicants – ACR and GS – provide explicit quantitative information indicating that their buffer reserves are sufficiently large to cover possible reversal events, including catastrophic losses across multiple projects. Given the potential volume of demand for carbon offsets that may arise under CORSIA, it will be important to ensure that the buffer reserves of approved programs are robust.</p> <p>We recommend that rigorous stress testing of the applicants’ buffer reserves be conducted prior to approval by ICAO, and that such</p>

			<p>stress testing be conducted on a regular basis as CORSIA progresses. Stress testing should demonstrate that buffer reserves are sufficient to cover potential catastrophic events, taking into account the geographical locations of projects.</p>
GCT, SFP	Section 4.5	All paragraphs	<p>Lack of provisions to address permanence. These two programs include activities with non-permanence risks in their application scope but do not appear to have provisions in place to address permanence or reversal risk.</p> <ul style="list-style-type: none"> · GCT refers only to permanence-related “applicability conditions” in “planned” methodologies for afforestation/reforestation (A/R) projects, and has not yet decided how reversal risk will be addressed for CCS projects. GCT indicates that it will follow CDM methodologies for permanence in A/R projects, but with shorter crediting periods; however, the CDM applies a “temporary crediting” approach to permanence that does not seem to be acknowledged here. Finally, GCT suggests that it has not yet registered any projects with reversal risks, so lack of clear policies should not (yet) be an issue. We recommend that for GCT to be approved, it should explicitly remove from its scope of eligible activities project activities that are subject to reversal risk. · SFP’s application seems to imply that because forests in Poland are a net sink for carbon, reversal risks do not apply. This is incorrect. Nevertheless, the applications refers to a “reserve” that could be used to compensate for reversals, but provides no details. The program does not seem to meet minimum criteria for fulfilling this EUC.
Nori	Section 4.5	All paragraphs	<p>Approach does not ensure permanence. Nori describes a unique approach to addressing permanence that, while innovative, does not appear to meet minimum requirements for meeting this EUC.</p>

			<p>In essence, Nori describes a forward-crediting approach, where total credits are gradually disbursed to projects (“suppliers”) over time and total disbursements are true-up based on an audit at 10 years, and then based on regular reporting (not audited) for 10 years thereafter. In principle, this monitoring and true-up process reduces the risk of over-crediting, including over-crediting as a result of reversals, but:</p> <ul style="list-style-type: none"> • Monitoring and true-up only extends for 10 years past the end of a project’s final crediting period. This is far less than the 100-year guarantee provided by other programs, which should be the benchmark for claiming “permanence.” • Nori notes that suppliers can extend the duration of carbon storage by re-enrolling their projects and adopting a new baseline. However, there is no requirement for projects to re-enroll, and there appears to be no enforcement of the new baseline (the application states explicitly that new baselines are a “theoretical assumption” and will be published “for general information purposes only.”) • As a result, there is no requirement for either suppliers or buyers to replace already-issued credits for which there are reversals (which could happen, for example, if carbon stocks fall <i>below</i> baseline levels). Liability is therefore not assigned (Paragraph 3.5.5 (a)) – and the checkbox for this requirement is left unchecked. Although Nori maintains an “insurance reserve pool” of tokens with which it could compensate for such reversals (noted above), it fails to address the moral hazard created by not imposing any liability on suppliers or buyers – nor is it clear that the “virtual” supply of tokens in Nori’s reserve pool could be used to secure a sufficient number of CRCs, which would depend on market availability.
CDM	Section 4.5	All paragraphs	Use of temporary crediting. Although not detailed in its application,

			<p>it should be noted that, for afforestation/reforestation (A/R) projects, the CDM’s approach to ensuring permanence differs markedly from other offset programs. Specifically, the CDM applies a “temporary crediting” approach, where offset credits expire after a predefined period and must be replaced with other units issued under the Kyoto Protocol (this holds for both tCERs and ICERs). In clearly defined instances – the end of a commitment period under the Kyoto Protocol for tCERs, or a non-permanence event or non-submission of a monitoring report for ICERs, the credits must be replaced. tCERs may be reissued for subsequent commitment periods.. At the end of a project’s final crediting period, however, no more credits may be issued and all credits must be replaced with permanent Kyoto units, regardless of whether a reversal occurred or not. This approach ostensibly guarantees permanence by ensuring that all offset credits associated with potentially non-permanent reductions or removals are replaced with units representing permanent reductions – even if no reversals occur during a project’s crediting period. This is arguably a stronger guarantee than that provided by buffer reserves.</p> <p>There are several challenges with the CDM’s approach, however. First, it was developed in the context of the Kyoto Protocol, and specific requirements are linked to elements of the Kyoto regime. For a certain subset of temporary credits, for example, expiry is linked to the end of the next Kyoto Protocol commitment period, which has yet to be defined (and likely will not be defined, as countries to the UNFCCC do not intend to adopt a third commitment period under the Kyoto Protocol). Moreover, in the absence of a third commitment period, permanent Kyoto units will no longer exist after the end of the true-up period of the second commitment period after 2023. After the end of that period, no units can be transacted within the Kyoto registry system. It may thus be technically impossible to</p>
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			<p>compensate for any reversals after 2023. Furthermore, the requirements to replace units legally apply only to Annex B Parties to the Kyoto Protocol; it is unclear how the requirement to replace expiring credits would be enforced in the context of CORSIA.</p> <p>Note that the CDM applies a different approach to ensuring the permanence of CCS projects, involving buffers for each project (i.e., CCS buffers are not “pooled”), combined with a state liability either by the acquiring country or the host country. Although this appears to be a conservative approach in general, it faces the same issues with regard to the operational ending of the Kyoto Protocol.</p> <p>In summary, while the CDM’s approaches to addressing non-permanence for AR and CCS project activities are in principle conservative and appropriate, they are functionally insufficient due to a lack of subsequent commitment periods under the Kyoto Protocol. Effectively, permanence for these activities is no longer ensured. We therefore recommend that these project types be excluded from scope should the CDM be approved as an eligible program.</p>
ACR, GS	Section 4.5	Paragraph 3.5.6	<p>Using a mix of credits in buffer reserves. Both ACR and the Gold Standard in principle allow a project to contribute to pooled buffer reserves using credits that were issued to <i>other</i> projects, including projects not subject to reversal risks. This can bolster the effectiveness of buffer reserves, because at least some of the buffer will not be subject to reversal (as it could be if only AFOLU-project credits are used). On the hand, this could create the risk that credits that are not eligible under CORSIA could be used to compensate for the reversal of credits that <i>are</i> CORSIA-eligible. Both ACR and the Gold Standard indicate that they are able to prevent this from happening. If both these programs are approved, then their approval</p>

			<p>should be conditional on having procedures in place to ensure that ineligible credits are not used to compensate for reversals of CORSIA-eligible credits.</p> <p>(It could also be noted that allowing different types of credits to compensate for reversals could create arbitrage opportunities for project developers. As a worst-case example, a developer could sell credits from an AFOLU project, terminate the project, and cover any liability using cheaper credits from other project types. While this presents no direct environmental integrity risks - as long as projects that are not CORSIA-eligible have the same quality as CORSIA-eligible projects - it could create issues for buyers who paid a higher price assuming they were also supporting the co-benefits of an AFOLU project.)</p>
Comments relating to avoiding double counting			
ACR, CAR, GS, VCS	Section 4.7	All paragraphs	<p>Incorporation of the Guidelines on Avoiding Double Counting for CORSIA. These Guidelines were developed by a multi-stakeholder group and aim to help carbon offsetting programs in implementing standards and procedures to avoid double counting for CORSIA. The Guidelines provide practical examples and guidance on how programs can address the EUCs related to double counting. They include guidance to address nearly all of the elements included in the TAB's "Guidelines for Criteria Implementation", with the exception of the "Reconciliation of double-claimed mitigation" (3.7.13).</p> <p>The four programs listed here have participated in the multi-stakeholder group that developed the Guidelines on Avoiding Double Counting for CORSIA. The ACR, CAR and GS refer in their application to the Guidelines; the VCS does not mention the Guidelines. From the language used in the applications of these four programs, it is however not fully clear whether the programs intend to incorporate</p>

			<p>the Guidelines in their entirety in their program standards and procedures:</p> <ul style="list-style-type: none"> • The ACR standard, version 6.0, chapter 10, incorporates by reference the "procedures to avoid double counting as detailed in the Guidelines on Avoiding Double Counting for CORSIA". Section 10.B.2 also incorporates some elements of the Guidelines into the standard, such as the requirement to obtain attestation letters from relevant countries. Given the short time available after publication of the Guidelines and the application window for the TAB, the incorporation by reference seems a good and straight-forward solution for those elements of the Guidelines that can be implemented directly by project owners. However, some elements of the Guidelines target the standards, procedures and operations of the carbon-offsetting programs. For example, the Guidelines include several options for how programs could satisfy CORSIA requirements; a reference to the Guidelines does not provide clarity about which of these elements are required for project owners and which not. There are also elements of the Guidelines which may require modifications to the operations of the program, such as the information and registry systems of the program. These can also not be addressed by a reference to the Guidelines. • The CAR highlights that several changes to relevant program documentation will be implemented to incorporate the Guidelines. This should be completed by the end of 2019. • The GS highlights that for addressing double claiming procedures will be developed in line with the Guidelines. The GS also explicitly refers to a new procedure that will be developed to qualify offset credits for use under CORSIA. These elements are planned to be finalized by the end of 2019, whereas other
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			<p>elements are only planned to be finalized around 2023-2024.</p> <ul style="list-style-type: none"> The VCS does not refer to the Guidelines. <p>We recommend that these four programs further clarify which elements of the Guidelines they intend to apply, or whether they will apply the Guidelines in their entirety. We also recommend that programs further clarify which program documents and operations will be changed to implement the Guidelines. In commenting below, we assume that all four programs apply the Guidelines in their entirety, including the VCS. However, we flag specific issues that may arise for programs on some aspects. If our assumption that the Guidelines will be applied in their entirety is not correct, some of the comments provided to other programs may also apply to ACR, CAR, GS and the VCS.</p>
BC	Section 4.7	Double issuance (paragraph 3.7.5)	Lack of procedures to avoid double issuance due to double registration of the same project within the same program. BC does not explain how they intend to avoid double registration of the same project within the same program. The application form only refers to registry functionalities, but this issue cannot be addressed through registry functionalities. To address this issue, the program should have standards and procedures in place that ensure that the same project is not simultaneously registered more than once within a single program.
FCPF	Section 4.7	Double issuance (paragraph 3.7.5)	Lack of procedures to avoid double issuance due to nested activities within a jurisdictional program. FCPF does not explain what procedures are in place to avoid double issuance with activities nested within the jurisdiction where FCPF is implemented. To address this issue, the programs could establish standards and procedures for accounting of nested activities.
BC, CDM, FCPF, Nori, TGO	Section 4.7	Double issuance (paragraph 3.7.5)	Lack of procedures to avoid double issuance due to double registration of the same project with other programs. The programs

			<p>listed here do not explain how they avoid double registration of the same project under two different programs. Other programs have procedures in place to avoid double issuance between two projects registered under two programs.</p> <p>To avoid double registration of the same project under different programs, programs should undertake checks, e.g. by reviewing project databases of other programs to verify that registered projects have not been issued offset credits in any other program for emission reductions. For that purpose, offset credit registries need to make information on offset credits available to users and the public. Programs should administer a publicly accessible, transparent and easily searchable project database for that purpose which may operate as a separately functioning system or be incorporated as part of the program's offset credit registry system. If a project is registered with more than one program, offset credits need to be cancelled by one program before offset credits are issued by another program for the same emission reductions and removals. The cancellations should be clearly designated for the purpose of allowing the reissuance of offset credits for the same emission reductions or removals under another program. For that purpose, legal attestations from project owners should also be obtained which confirm that they have not and will not request issuance of offset credits for emission reductions or removals from more than one program, unless such offset credits are canceled under one program prior to reissuance. By that means, the risk of double registration can be reduced by making project owners liable in case of not adhering to the obligations they have signed on to.</p>
GCT	Section 4.7	Double issuance (paragraph 3.7.5)	<p>Lack of clarity how double issuance with other programs is avoided. GCT states that, in order to avoid such double issuance, the GPS coordinates of the project will be checked before issuing offset</p>

			credits. However, there is no reference to relevant standards and procedures which clearly establish requirements that double registration is not allowed or not avoided. It is also questionable whether GPS checks are sufficient to avoid this form of double issuance. Most other programs require legal attestations from project owners that they will not register the project elsewhere, or similar means.
ACR, BC, CCER, CDM, FCPF, GCT, GS, Nori, TGO, VCS	Section 4.7	Double issuance (paragraph 3.7.5)	<p>Double issuance of offset credits from different projects which indirectly address the same mitigation activity under the same or different programs. Double issuance can also occur indirectly, through overlapping claims by different entities involved in carbon offset projects. This can, for example, occur when different entities involved in the production and/or consumption of the same good or service are allowed to claim offset credits for the same emission reductions or removals. The programs listed here are not clear how they avoid such double issuance, in particular in relation to such overlap with other programs (e.g. if one program credits the production of biofuels, whereas another program credits the use of biofuels).</p> <p>The CAR addresses this issue by avoiding the development and adoption of protocols that are likely to present a risk of ownership issues. Some CDM methodologies also address this issue, inter alia, by requesting that project owners seek written attestations from other potential owners of the emission reductions that they will not claim the emission reductions. For some activities, CDM methodologies also only allow that one possible user can claim emission reductions. More indirect overlaps are also addressed, for example, by using emission factors that consider other CDM projects with potentially overlapping claims. However, the CDM addresses this form of double issuance only with regard to other CDM projects but</p>

			<p>does not avoid it with regard to projects registered under other programs.</p> <p>We recommend that programs listed here clarify how they address this form of double issuance. To avoid this form of double issuance, programs could establish quantification standards and project eligibility criteria that ensure that overlapping emission reduction or removal claims are avoided so that different projects cannot be issued credits for the same emission reductions or removals. To prevent overlapping claims, procedures and methodologies for the accounting of emission reductions or removals need to be defined. For that purpose, the boundaries for different project types need to be defined so that overlap does not occur. The Guidelines on Avoiding Double Counting for CORSIA provide further information that may be useful in implementing such standards and procedures.</p>
BC, CCER, CDM, FCPF, GCT, Nori, TGO	Section 4.7	Double use (paragraph 3.7.6)	<p>Lack of CORSIA compatible cancellation procedures to avoid double use of the same offset credits. Double use of offset credits could occur not only if the same offset credit is cancelled twice, but also if one cancellation is applied to more than one emission reduction claim. This could occur, for example, if the purpose of a cancellation is ambiguous, such that more than one entity could assert a claim to it. The programs listed here are not clear how they would ensure that, for CORSIA compliance, the cancellation purpose is clearly indicated such that only one party (e.g., an aeroplane operator) can credibly claim the use of an offset credit.</p> <p>To address this issue, programs need to incorporate cancellation procedures that ensure that a cancellation is clearly indicated, irreversible and unambiguously designated for a specific purpose. Accordingly, cancelled offset credits should be clearly linked to a specific offsetting requirement of a particular aeroplane operator.</p>

			<p>The registry functionalities of the program should require the registry user, in order to conduct a CORSIA-related cancellation, to specify the aeroplane operator for which the offset credits were cancelled and the calendar year for which an offsetting requirement is fulfilled through the cancellation (e.g. “XYZ Airlines, 2024 offsetting requirement, covering the 2021-2023 offsetting compliance period under CORSIA”).</p>
BC, CCER, CDM, FCPF, GCT, Nori, TGO	Section 4.7	Host country attestation to the avoidance of double-claiming (paragraph 3.7.8)	<p>Content of host country attestations. The programs listed here are not clear what information in host country attestations would be regarded as sufficient for the program to qualify offset credits as being CORSIA eligible.</p> <p>To address this issue, we recommend that programs establish procedures that require that attestation letters must, as a minimum, include the following information in order for the program to qualify offset credits from a project as being CORSIA eligible:</p> <ul style="list-style-type: none"> · Identify the project; · Acknowledge that the project may reduce emissions (or enhance removals) in the country; · Acknowledge that the program to which the letter is provided has issued, or intends to issue, offset credits for the emission reductions or removals that occur within the country; · Authorize the use of the project’s emission reductions or removals, issued as offset credits, by aeroplane operators in order to meet offsetting requirements under CORSIA; · Declare that the country will not use the project’s emission reductions or removals to track progress towards, or for demonstrating achievement of, its NDC (or other relevant international mitigation targets, as applicable) and will account for their use by aeroplane operators under CORSIA by applying

			<p>relevant adjustments (or for other relevant international mitigation targets by taken appropriating other means such as the cancellation of assigned amount units under the Kyoto Protocol).</p> <p>It may also be helpful if programs encourage that letters:</p> <ul style="list-style-type: none"> · Provide a stipulation regarding the maximum number of the project’s emission reductions or removals, issued as offset credits, that the country authorizes for use, including any limits on the time period over which the country provides such authorization; · Include a request to the program to provide information to the country on the use of the offset credits; · Declare that the country will report on the authorization and use of the project’s emission reductions or removals by other countries or entities in a transparent manner in its biennial transparency report submitted under Article 13 of the Paris Agreement. <p>Programs may also include example letters in any best practice guidelines. Further relevant information, including example letters, can be found in the Guidelines on Avoiding Double Counting for CORSIA.</p>
Cross-cutting issue / All programs	Section 4.7	Host country attestation to the avoidance of double-claiming (paragraph 3.7.8)	<p>Mitigation outcomes outside the scope of NDCs. There is ongoing debate in international negotiations under the Paris Agreement whether emission reductions that are not covered by NDCs are eligible for international transfer and, if yes, whether corresponding adjustments or other safeguards are necessary. While technically double claiming does not occur if the emission reductions or removals are not covered by an NDC, the use of such offset credits could create a number of environmental integrity concerns. It could,</p>

			<p>in particular, create perverse incentives for countries not to broaden the scope of their NDCs. This could undermine the objective in Article 4.4 of the Paris Agreement that all countries should move over time towards economy-wide targets. If the emission reductions are covered by NDCs, countries may also have greater incentives to ensure that they only authorize projects that are additional and do not over-estimate emission reductions. A further practical difficulty of not requiring adjustments for emission reductions or removals that are not covered by NDCs is that the scope of current NDCs is often not clear, and it may be practically difficult to differentiate whether an emission reduction is covered or not covered by an NDC. This could potentially result in inconsistent treatment by different programs, even in the same country with the same activities.</p> <p>While this matter cannot be resolved by carbon-offsetting programs and should ideally be addressed by the Parties to the Paris Agreement, including for offset credits used under CORSIA, in the absence of such clear international rules under the Paris Agreement this issue is a relevant matter for the process of approval of programs by ICAO. Effectively, by approving programs, ICAO would either approve the use of such emission reductions (if the program's procedures allow them to be qualified for use under CORSIA) or not approve them (if the program's procedures do not allow them to be qualified).</p> <p>None of the programs provide information in their applications whether and under which conditions they would qualify offset credits for use under CORSIA if the associated emission reductions are not covered by NDCs and no rules on this matter have been adopted under the Paris Agreement. In particular, it is unclear how they would handle a situation where the letter from the relevant country would</p>
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			<p>NOT confirm that the country intends to apply adjustments for emission reductions not covered by the NDC and used under CORSIA.</p> <p>If this matter is not resolved at COP25 in Santiago, including for offset credits used under CORSIA, we recommend that programs and ICAO adopt a cautious approach, in order to avoid that offset credits are qualified for use under CORSIA that may not satisfy future rules under the Paris Agreement. To implement such a cautious approach, we recommend that programs only qualify offset credits for use under CORSIA:</p> <p>1) if the offset credit's associated emission reductions are covered by NDCs; or</p> <p>2) if the attestation letter by the relevant country specifies that all emission reductions - irrespective of whether they are covered or not covered by an NDC (or other relevant international mitigation target) - will be accounted for by the country through the application of adjustments.</p> <p>If this matter is clarified at COP25 in Santiago, the approach adopted would need to be incorporated in relevant program standards and procedures, to ensure consistency with relevant international rules.</p>
ACR, BC, CAR, CCER, CDM, FCPF, GCT, GS, Nori, TGO, VCS	Section 4.7	Host country attestation to the avoidance of double-claiming (paragraph 3.7.8)	<p>Possibility of host country attestations from countries that do not participate in the Paris Agreement. The EUC on double claiming specifies that host countries of emissions reduction activities should agree to "account for any offset units issued" as a result of those activities such that double claiming does not occur between the airline and the host country of the emissions reduction activity." The Guidelines for interpretation further specify that this should occur on the basis of an attestation which should describe the steps taken to</p>

			<p>prevent double claiming.</p> <p>However, none of the programs listed here provide information whether they would qualify offset credits for use under CORSIA if the relevant country does not participate in the Paris Agreement, or has not communicated an NDC for the applicable implementation period, but would nevertheless issue a letter authorizing the use of the emission reductions under CORSIA.</p> <p>We recommend that all programs clarify as part of their procedures that offset credits issued for emission reductions after 2020 can only be qualified by a program as CORSIA eligible if the relevant country participates in the Paris Agreement and has communicated an NDC for the applicable NDC implementation period.</p> <p>As part of the program approval process, ICAO will need to clarify, and programs will need to implement respective provisions, whether emission reductions from countries that do not participate in the Paris Agreement, or that have not communicated an NDC for an applicable NDC implementation period, should be eligible for use under CORSIA.</p> <p>In our view, this is not only essential to satisfy the EUCs with regard to the requirement to account for offset credits, but also to avoid that CORSIA creates a perverse incentive for countries to withdraw from the Paris Agreement. Such perverse incentives could undermine global mitigation ambition beyond CORSIA. Lastly, qualifying offset credits from countries that currently do not participate in the Paris Agreement could also lead to double claiming if a country would later join the agreement again.</p>
BC, CCER, CDM,	Section 4.7	Double claiming	Lack of procedures to identify overlap with a country's NDC. A key

FCPF, GCT, Nori, TGO		procedures (paragraph 3.7.9)	<p>prerequisite for avoiding double claiming is that any overlap with a country's NDC under the Paris Agreement is identified. A systematic identification of whether a project involves activities or emission reductions or removals that are covered by NDC targets is necessary in order to provide transparency on potential effects of a project on a country's progress towards achieving its NDC targets. Such transparency helps countries to plan the achievement of their NDC targets and understand how the implementation of projects might affect their progress towards NDC targets. Also, this information may be needed for countries to apply adjustments in cases of overlap. The programs listed here do not specify how they intend to implement procedures to identify overlap with NDCs.</p> <p>To address this issue, programs should adopt a procedure to identify overlap with NDC targets. The results of the assessment of overlap with a country's NDC would need to be documented, such as through a publicly accessible database where relevant information on each offset credit is accessible (e.g. whether it overlaps with relevant NDC targets, whether adjustments are necessary, and whether the relevant adjustments have been applied). The Guidelines on Avoiding Double Counting for CORSIA provide useful further information how this could be implemented.</p>
BC, CCER, CDM, FCPF, GCT, Nori, TGO	Section 4.7	Double claiming procedures (paragraph 3.7.9)	<p>Lack of procedures to ensure gathering and public provision of information on the country where the emission reductions or removals occurred. To prevent double claiming and seek attestation letters (see comment further below), it is necessary to identify in which countries the offset credits' emission reductions or removals occurred. In most instances, a project is implemented only in one country and the emission reductions or removals occur in the same country. In some instances, however, the emission reductions or removals could occur in several countries or in a different country</p>

			<p>than where the project is being implemented. Examples include programmatic approaches that often implement activities in several countries; multinational electricity systems in which the generation or saving of electricity in one country can affect the emissions from power plants in other countries; and projects avoiding upstream or downstream emissions that occur in other countries, such as from the production of fossil fuels.</p> <p>The programs listed here do not include information in their applications on how they identify the countries where the emission reductions occur.</p> <p>To address this issue, programs need to adopt standards and procedures to identify the relevant countries and allocate the emission reductions respectively to the relevant countries. For that purpose, the Guidelines on Avoiding Double Counting for CORSIA recommend that programs require project owners and/or program staff to</p> <ul style="list-style-type: none"> • Identify the countries in which the project is implemented, i.e. where the mitigation action is undertaken, • Identify the country, or group of countries, where the project’s calculated emission reductions or removals occur, • Determine the proportion of emission reductions or removals that occurred within each identified country, ensuring that <ul style="list-style-type: none"> ○ The allocation is proportional to where the emission reduction or removals occurred ○ A project cannot claim emission reductions in one country while ignoring increases of emissions in another country due to the project ○ The total number of offset credits issued does not exceed
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			<p>the net emission reductions or removals of the project in all countries</p> <ul style="list-style-type: none"> Assign an attribute to each offset credit indicating the country where the emission reductions or removals occurred, ensuring that only one country is assigned to each offset credit.
BC, CCER, CDM, FCPF, GCT, Nori, TGO	Section 4.7	Double claiming procedures (paragraph 3.7.9)	<p>Lack of specification of approach to identify the calendar years in which the emission reductions or removals occurred. The programs listed here do not explain how they plan to identify the calendar years in which the offset credits' emission reductions or removals occurred. This is necessary in order to effectively avoid double claiming, as it is necessary to assess whether an offset credit's emission reductions or removal fall within a period that is covered by a relevant mitigation target. It also necessary for enabling robust accounting for the use of offset credits over time, in particular in the context of single-year mitigation targets.</p> <p>The programs do not provide information how they plan to address this. The CDM includes such approaches, but only for identifying the relevant commitment period, not individual calendar years. In the post-2020 context, however, with many countries having single year targets, it is necessary to identify the calendar year in which the emission reductions occurred.</p> <p>To address this issue, the programs should establish standards and procedures to identify for each offset credit the calendar year in which the associated emission reductions or removals occurred, and to assign to each issued offset credit an attribute indicating the calendar year. Offset credits should be allocated proportionally to calendar years. For that purpose, the Guidelines on Avoiding Double Counting for CORSIA recommend two different approaches:</p>

			<ul style="list-style-type: none"> • Direct measurement: the emission reductions are measured continuously, or relevant meters are read at the end of a calendar year; • Allocation based on plausible assumptions: the emission reductions are allocated to the calendar years using plausible assumptions on when they likely occurred. <p>The allocation of offset credits to calendar years should be transparently documented. Clear allocation of credits to calendar years allows assessing whether an offset credit’s emission reduction or removal falls within a period that is covered by an NDC.</p>
BC, CCER, CDM, FCPF, GCT, Nori, TGO	Section 4.7	Double claiming procedures (paragraph 3.7.9)	<p>Lack of procedure to provide countries information necessary to apply adjustments in the GWP values that they use to account for their NDCs. In some instances, countries may account for their mitigation targets in different GWP values than the values that the program uses to issue offset credits for use under CORSIA. Under the Paris Agreement, for example, it is envisaged that countries account for emissions and removals in accordance with “common metrics” assessed by the IPCC (decision 1/CP.21, paragraph 31, sub-paragraph a). At COP24 in Katowice, Parties agreed that each Party shall use in their national inventory reports the 100-year time-horizon GWP values from the 5th IPCC assessment report, or 100-year time-horizon GWP values from a subsequent IPCC assessment report as agreed upon by the CMA, to report aggregate emissions and removals of GHGs, expressed in CO₂eq. Each Party may in addition also use other metrics (e.g. global temperature potential) to report supplemental information on aggregate emissions and removals of GHGs, expressed in CO₂eq (see paragraph 37 of the decision 18/CMA.1 on “Modalities, procedures and guidelines for the transparency framework for action and support referred to in Article 13 of the Paris Agreement”). Furthermore, Parties adopted guidance</p>

			<p>on accounting for Parties' nationally determined contributions, which establishes that Parties account for anthropogenic emissions and removals in accordance with these metrics (paragraph 1, subparagraph a, of Annex II to decision 4/CMA.1 on "Further guidance in relation to the mitigation section of decision 1/CP.21"). This accounting guidance is, however, only mandatory for second and subsequent NDCs (paragraph 32 of decision 1/CP.21 and paragraph 14 of decision 4/CMA.1). In their first NDCs, countries communicated that they intend to use various GWP values, including values from the 2nd, 4th, and 5th IPCC assessment reports. It is thus possible that some countries use, for the first NDC, values other than those from the 5th IPCC assessment report to account for their NDC.</p> <p>This brings challenges for the consistency of GWP values used by programs to issue offset credits, and the amounts that need to be accounted for by countries in their own GWP metrics. To address this issue and enable robust accounting by countries for the use of offset credits under CORSIA, it is thus necessary that programs establish procedures that inform countries about the amount of adjustments that are necessary to effectively avoid double claiming based on the GWP values applied by the countries. The Guidelines on Avoiding Double Counting for CORSIA provide further information on how such information could be reported. None of the programs listed explain in their applications how they intend to address this issue.</p>
ACR, BC, CAR, CCER, CDM, FCPF, GCT, GS, Nori, TGO, VCS	Section 4.7	Double claiming procedures (paragraph 3.7.9)	<p>Procedures to avoid double counting with international mitigation targets in the period up to 2020. Through 2020, countries have agreed to or communicated international climate change mitigation targets in the context of the UNFCCC, the Kyoto Protocol and its Doha Amendment. In response to the fifteenth and sixteenth Conferences of the Parties (COP) to the UNFCCC, held respectively in Copenhagen and Cancun, countries put forward voluntary pledges and nationally-</p>

			<p>appropriate mitigation actions for the year 2020 (hereinafter referred to collectively as “Cancun targets”). The targets of developed countries that participate in the Kyoto Protocol’s second commitment period were later translated into quantified emission limitation and reduction objectives for the period 2013 to 2020 and included in Annex B under the Doha Amendment, while the targets of other countries remain under the UNFCCC.</p> <p>The programs take diverse approaches to avoid double counting in the context of these mitigation targets. Some programs avoid double counting with Kyoto Protocol targets (e.g. by requiring cancellation of AAUs if offset credits are issued). Some programs also avoid double counting with Cancun targets communicated by Annex I countries (mostly by not allowing projects in these countries), while others ignore these targets. Some programs are not entirely clear. We recommend that all programs provide clear information with which type of international mitigation targets they intend to avoid double claiming.</p> <p>In our view, double claiming should be avoided with both Kyoto and Cancun targets. In the negotiations following the adoption of the Cancun targets, Parties agreed that “various approaches, including opportunities for using markets ... must meet standards that ... avoid double counting of effort” (decision 2/ CP.17, paragraph 79). Decision 1/CP.21, adopting the Paris Agreement, also refers to avoiding double counting in the context of action prior to 2020, urging “host and purchasing Parties to report transparently on internationally transferred mitigation outcomes, including outcomes used to meet international pledges, and emissions units issued under the Kyoto Protocol with a view to promoting environmental integrity and avoiding double counting.” International decisions under UNFCCC</p>
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			<p>thus point to the need to avoid double counting. Moreover, the EUCs are clearly not limited to NDCs but cover mitigation efforts and obligations more broadly. Lastly, in our view, allowing double counting with internationally communicated mitigation targets in the period up to 2020 could undermine the integrity and ambition of CORSIA.</p>
<p>BC, CCER, CDM, FCPF, GCT, Nori, SFP, TGO</p>	<p>Section 4.7</p>	<p>Double-claiming procedures (paragraph 3.7.9)</p>	<p>Lack of procedures to avoid double claiming with mandatory domestic climate change mitigation targets. The programs listed here do not explain how double claiming with mandatory domestic climate mitigation targets can be avoided. Mitigation activities that are used under CORSIA might overlap with domestic mandatory climate targets. For example, renewable power plants could also reduce emissions in regional or national emissions trading system (ETS). Some programs explicitly have procedures in place to avoid such double counting or plan to implement them. For example, several programs avoid double counting with ETSs and have procedures that emission reductions covered by an ETS can either not be issued as offset credits or that a respective amount of ETS allowances be cancelled if offset credits are issued. The programs listed here do not explain whether they avoid such double counting.</p> <p>SFP, for example, proposes to qualify emission reductions for use under CORSIA that can also be used to achieve mandatory EU legislation (LULUCF Regulation, Regulation (EU) 2018/841). Under the EU's LULUCF regulation, countries can use the same emission reductions to achieve their LULUCF target and partially to compensate for emissions in other sectors. The EU legislation does not include means to account for the use of these emission reductions under CORSIA. EU legislation would thus need to be amended to avoid double counting for CORSIA.</p>

			<p>To address this issue, programs should have procedures in place to identify relevant mandatory domestic mitigation targets and a project's overlap with such targets in order to avoid double claiming. Any potential overlap should be addressed through</p> <ul style="list-style-type: none"> · Requiring that activities or emission reductions/removals that are associated with offset credits are not counted towards the achievement of relevant domestic mitigation targets · Not issuing offset credits for activities or emission reductions or removals that are covered by these targets · Not qualifying offset credits for use under CORSIA if the associated activities or emission reductions or removals are covered by these targets.
ACR, GCT, GS, VCS	Section 4.7	Double claiming procedures (paragraph 3.7.9)	<p>Clarification of ineligibility of emission reductions from international bunker fuel sectors. The programs listed here are not fully clear in their applications whether emission reductions from decreasing the use of international bunker fuels are ineligible. If such emission reductions were eligible, this could lead to double claiming within CORSIA (as the airlines would claim the same emission reductions through lower reported emissions and through the use of these offset credits) or with mitigation efforts and targets under the International Maritime Organization (IMO).</p>
ACR, CAR, CDM, GCT, VCS	Section 4.7	Double-claiming procedures (paragraph 3.7.9)	<p>Potential double claiming with targets under the Montreal Protocol and its amendments. The Montreal Protocol and its amendments establish binding targets for countries to reduce the consumption and production of ozone depleting substances (ODS) as well as HFCs (in the recent Kigali amendment). The programs listed here include the reduction of ODSs or HFCs within their scope, or are not entirely clear whether these activities are included within their scope requested to be eligible for CORSIA. It is not clear how the programs ensure that credited emission reductions from these gases are not</p>

			used to achieve both CORSIA offsetting obligations and the targets under the Montreal Protocol and its amendments.
Cross-cutting issue / All programs	Section 4.7	Double-claiming procedures (paragraph 3.7.9)	<p>Potential double claiming of emission reductions in relation to NDC targets expressed in non-GHG metrics. If an NDC target is expressed in non-GHG metrics, double claiming can occur if emission reductions that are used as offset credits under CORSIA result from activities that also contribute to achieving non-GHG targets in a country's NDC (e.g. energy efficiency targets, increasing renewable energy or forest cover).</p> <p>In international negotiations under the Paris Agreement, it is not yet clear how any targets in non-GHG metrics will be considered. One option considered is expressing such NDCs in GHG emissions terms for accounting purposes, another option is considering non-GHG metrics. Depending on the outcome, programs will need to have procedures in place to identify any overlap between project activities and non-GHG targets. So far, a decision on accounting of such mitigation outcomes and potential adjustments has not been taken. If the CMA provides guidance in this respect in the future, this should be implemented as requirements for programs operating under CORSIA as well.</p>
BC, FCPF, Nori, TGO	Section 4.7	Double claiming procedures (paragraph 3.7.9)	Lack of procedures for ensuring that offset credits are issued only after final program approval of verification reports. The programs listed here do not explain how they ensure that offset credits are issued only after emission reductions have occurred and been verified. If offset credits were issued ex-ante, this could lead to double counting (e.g. if an NDC is updated to include sources for which credits were already issued in advance).
BC, CCER, CDM, FCPF, GCT, Nori, TGO	Section 4.7	Double-claiming procedures (paragraph	Lack of procedures to obtain evidence of appropriate accounting by host countries. The programs listed here are not clear how they plan to obtain evidence of appropriate accounting by host countries. In

		<p>3.7.9.2) and comparing unit use against national reporting (3.7.11)</p>	<p>order to avoid double claiming, programs need to establish procedures to check whether countries have appropriately accounted for any emission reductions that were used as offsets under CORSIA when claiming the achievement of their mitigation targets.</p> <p>To address this issue, programs should adopt standards and procedures to obtain such evidence. The procedure should address all relevant types of mitigation targets (domestic, international) and mandatory schemes (such as emissions trading systems). In the context of emissions trading systems, for example, the procedures should ensure that a respective amount of allowances are cancelled for any emission reductions achieved within the scope of the emissions trading system.</p> <p>In the context of NDCs under the Paris Agreement, programs should verify that the relevant country has established and is operating an accounting system for recording adjustments; that the adjustment was recorded appropriately in the accounting system and reported in the structured summary referred in paragraph 77d of the Annex to decision 18/CMA.1 and paragraph 17 of decision 4/CMA.1; and that all necessary adjustments were appropriately applied, consistent with relevant international rules. Evidence for the application of adjustments could, for example, be provided in the form of a letter or certificate (physical or electronic) from the relevant country indicating that the required adjustments have been applied within the relevant accounting system. Any evidence should clearly reference the offset credits for which the country has applied the adjustments.</p> <p>A program’s standards and procedures should also clarify when the program should take action to obtain evidence of appropriate</p>
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			accounting by the host country.
BC, CCER, CDM, FCPF, GCT, Nori, SFP, TGO	Section 4.7	Reconciliation of double-claimed mitigation (paragraph 3.7.13)	<p>Public reporting. The programs listed here do not provide information on their procedures for public reporting. The regular publication of reports with aggregated information can facilitate the avoidance of all forms of double counting. The countries where the emission reductions or removals occur require information on the issuance and use of offset credits for the purpose of applying adjustments. Aggregated information on the issuance and use of offset credits is also required to reconcile and compare the use of offset credits under CORSIA with the adjustments applied by countries.</p> <p>To address this issue, we recommend that programs regularly publish reports that provide aggregated information related to the issuance and cancellation of offset credits. Such reports should be published at least annually within six months after the end of a calendar year and include at a minimum</p> <ul style="list-style-type: none"> · Total issued offset credits by country, calendar year, and the need for application of adjustments, · Total cancelled offset credits by aeroplane operators, · The maximum number of emission reductions or removals from projects registered with the program, authorized by countries for use by other countries or entities, by country and calendar year. <p>The Guidelines on Avoiding Double Counting for CORSIA provide further information reporting elements.</p>
ACR, BC, CAR, CDM, CCER, FCPF, GCT, GS, Nori, SFP, TGO, VCS	Section 4.7	Reconciliation of double-claimed mitigation (paragraph 3.7.13)	Lack of procedures to reconcile credits once double-claimed. The programs listed here do not provide information on how they deal with double counting once it has occurred. Procedures are necessary to ensure that any double-claimed mitigation associated with units

			<p>used under CORSIA are compensated for, replaced or otherwise reconciled.</p> <p>Most programs do not provide any information on how to deal with this issue or vaguely state that they will put in place or would be willing to consider introducing a mechanism to compensate for instances of double claiming, as required by ICAO (e.g. ACR, VCS).</p> <p>Nori mentions in its application and supporting documents that all purchases of credits under CORSIA are insured to be made whole by the Nori insurance reserve. However, according to the program documentation by Nori (section 2.5), this insurance does not cover double counting (e.g. a situation where the country does not apply necessary adjustments). It is also unclear whether this insurance will be able to adequately address the underlying risk.</p>
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* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

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Comment Set #12

Name:

Nancy N. Young

Organization:

Airlines for America

Date of receipt:

5 September 2019

From: Young, Nancy <NYoung@airlines.org>
Sent: 5-Sep-19 17:17
To: Office of the Environment
Subject: Airlines for America's Comments on the Public Comment Opportunity - CORSIA "Call for Programme Applications"
Attachments: A4A Comment Letter-CORSIA Offset Program Applications-Final-9-5-19.pdf

To: The International Civil Aviation Organization
Attention: Technical Advisory Body

Airlines for America® (A4A) appreciates this opportunity to comment on the International Civil Aviation Organization's "Call for Programme Applications" for review of carbon offset programs against the emissions units criteria under ICAO's Carbon Offsetting and Reduction Scheme for International Aviation. Our comments are included in the attached letter.

Thank you for your consideration.

Sincerely yours, Nancy Young

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Airlines for America®

We Connect the World

September 5, 2019

International Civil Aviation Organization
Via email: officeenv@icao.int

Attn: Technical Advisory Body

Re: Airlines for America Comments on the “Call for Programme Applications” for Offset Program Review against the CORSIA Emissions Units Criteria

To Whom It May Concern:

Airlines for America® (A4A) appreciates this opportunity to comment on the International Civil Aviation Organization’s (ICAO) “Call for Programme Applications” for review of carbon offset programs (hereafter “Programs”) against the emissions units criteria (EUC) under ICAO’s Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).¹ A4A is the principal trade and service organization of the U.S. airline industry.² As the record of the A4A carriers demonstrates, we take our role in controlling greenhouse gas (GHG) emissions very seriously. We are part of the global aviation coalition coordinated through the Air Transport Action Group (ATAG) that has adopted rigorous emissions reduction goals and is implementing an array of measures to achieve those goals, including through the implementation of CORSIA.

As detailed below, we support the ICAO-adopted emissions units criteria (EUC) and appreciate the work that the 19-country “Technical Advisory Body” (TAB) and ICAO Council are undertaking to review offset Programs and the units they offer against those criteria. We are confident that the rigorous EUC will ensure the environmental integrity of CORSIA’s offsetting system and we urge a data-driven review process, which we believe should confirm broad access to qualified Programs and offset units including those from Reducing Emissions from Deforestation and forest Degradation, and sustainable management of forests, conservation of forest carbon stocks and enhancement of forest carbon stocks, known as REDD+.

¹ This comment letter is in specific reference to the Technical Advisory Body notice on the ICAO public website at <https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx>.

² The members of the association are: Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Federal Express Corporation; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

I. A4A Members' Strong Climate Change Record and Support for CORSIA to Complement Technology, Operations, Sustainable Aviation Fuel and Infrastructure Measures

We emphasize at the outset that A4A and our member airlines have a strong environmental record and a demonstrated commitment to sustainable aviation growth – as does the global aviation industry. For the past several decades, the U.S. airlines have dramatically improved fuel and emissions efficiency by investing billions in fuel-saving aircraft and engines, innovative technologies like winglets (which improve aerodynamics) and cutting-edge route-optimization software. As a result, between 1978 and 2018, the U.S. airline industry improved its fuel efficiency by more than 130 percent, resulting in nearly 5 billion metric tons of carbon dioxide (CO₂) savings – equivalent to taking over 26 million cars off the road *each of those years*.³

A4A and our members continue to build on this foundation. As noted, we are active participants in the global aviation coalition coordinated through ATAG that has committed to 1.5 percent annual average fuel efficiency improvements through 2020, with goals to achieve carbon neutral growth in international aviation from 2020 and a 50 percent net reduction in CO₂ emissions in 2050, relative to 2005 levels, subject to critical aviation infrastructure and technology advances achieved by government and industry. The initiatives our members are undertaking to further address GHG emissions are designed to responsibly and effectively limit their fuel consumption, GHG contribution, and potential climate change impacts, while allowing commercial aviation to continue to serve as a key contributor to the economy, at the local, regional, national and global levels.

Coupled with an array of technology, operations, sustainable aviation fuels (SAF) and infrastructure measures, ICAO's CORSIA is a key pillar to the achievement of the industry's goals. Accordingly, A4A and our members were pleased to support the agreement reached at ICAO for CORSIA to serve as the single, global market-based measure for addressing GHG emissions from international aviation. We also support the ICAO-adopted EUC, as their scope and rigor will ensure environmental integrity of CORSIA-eligible units. Further, the fact that they are performance-based technical criteria backed by guidance should allow a range of offset Programs and appropriately-managed units to qualify, which is critical to ensuring sufficient supply of available emissions units at cost-effective prices.

II. Comments on the Programme Review

As noted, A4A and our members appreciate the work the TAB and ICAO Council are undertaking to review offset Programs and the units they offer against the EUC. Although we have read through the Programme Applications available on the ICAO website, our comments here do not provide a review of specific Programs. Rather, we

³ In line with that, Air Canada itself achieved a 44.5 percent improvement in its fuel efficiency between 1990 and 2018. See Air Canada's 2018 Corporate Sustainability Report, at <https://www.aircanada.com/content/dam/aircanada/portal/documents/PDF/en/corporate-sustainability/2018-cs-report.pdf>.

write in support of the data-driven review process that has been established, which should ensure that all Programs and units that meet the rigorous EUC are approved as CORSIA-eligible.

ICAO has estimated that despite earnest efforts on technology, operations, SAF and infrastructure, aviation will have to offset about 2.5 billion metric ton of CO₂ under CORSIA between 2021 and 2035. By way of context, this is more than the total volume of offsets ever issued under the United Nations' Clean Development Mechanism or traded in the voluntary carbon market. In addition, it is expected that demand for carbon offsets will grow outside of international aviation, due to commitments that countries have made and growing demand by various companies and individuals seeking to offset their carbon emissions.

To ensure there is a sufficient volume of eligible emissions units, it is critical that operators have access to a broad range of units from existing offset Programs and projects that meet ICAO's eligibility criteria. We trust that the TAB will evaluate each Program for its technical attributes to ensure that all Programs that meet the EUC criteria and requirements are recommended by the TAB to the ICAO Council for approval.

There are many ways to achieve CO₂ reductions that can be used as offsets, many of which bring other social, environmental or economic benefits relevant to sustainable development. A4A and our members support the inclusion of a whole host of activities to generate offsets, whether renewable energy, clean cook stoves, methane capture, forestry-related, etc., as long as all the EUC criteria are met. That said, as we understand that some critics have tried to call REDD+ credits into question, we write to share our understanding that properly-managed REDD+ credits can and do meet the EUC and could serve as an important source of units under CORSIA.

Forests play a significant role in climate change management. As the Intergovernmental Panel on Climate Change (IPCC) has established, about 25 percent of global GHG emissions come from the land sector (the second largest source of GHG emissions after the energy sector), with about half of the land sector emissions coming from deforestation and forest degradation.⁴ In fact, protecting forests and promoting their restoration has been projected to have the potential to contribute over one-third of the total climate change mitigation that scientists indicate is required by 2030 to meet the objectives of the Paris Agreement.⁵ In addition, forests protect biodiversity, water quality and broader ecosystem benefits with 25 percent of the world's population relying upon forests for their livelihoods.

According to the World Bank, between 1990 and 2016, we've lost 1.3 million square kilometers of forests.⁶ Many countries are striving to conserve their forests and are in the

⁴ "Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems" (August 2019) available at <https://www.ipcc.ch/report/srccl/>.

⁵ Id.

⁶ <https://blogs.worldbank.org/opendata/five-forest-figures-international-day-forests>

need of sources of funding for programs to address deforestation and forest degradation. Carbon finance, including carbon market demand such as that being established by CORSIA, can play a significant role in the battle against such deforestation. REDD+, as suggested by its full name, “Reducing emissions from deforestation and forest degradation and the roles of conservation, sustainable management of forests and enhancement of forest carbon stocks,” will be vital for global efforts to combat climate change

The aviation industry has for many years supported forestry and wildlife protection as part of its broader support to the communities to which they fly and in support of the UN’s Sustainable Development Goals. Global aviation is a driver of sustainable development, bringing together people, businesses and communities and supporting trade and tourism. Safe, reliable, efficient and cost-effective air transport is an essential component of a broader mobility strategy to help achieve the United Nations 2030 Agenda for Sustainable Development.⁷

The possibility to generate offsets under REDD+ creates a financial incentive for countries to reduce emissions from forested lands and invest in low-carbon paths to sustainable development and deliver a wide range of benefits. At the same time when there is a need for financing to protect forests, there is also a need for aircraft operators to have access to carbon offsets to meet their compliance obligations under CORSIA.

A4A is not in a position to parse out which Programs the TAB should recommend to the ICAO Council as CORSIA-eligible. However, we urge consideration of several principles that we think are important in considering the inclusion of programs with REDD+ activities.

First, it is important to include Programs that can provide market readiness through established activities and projects, recognizing that there are mechanisms in place for ICAO to consider additional Programs over time that will later be able to provide forestry protection and expand the REDD+ market. Market-ready Programs include those that can provide units generated from a jurisdictional-scale (national or sub-national) and from site-scale level that are “nested” within national implementation to address the potential for leakage.⁸ Nesting is recognized by the Conference of the Parties under the United Nations Framework Convention on Climate Change (UNFCCC), under procedures referred to as the “Warsaw Framework,” as a way to address significant leakage concerns for REDD+ projects and would meet the ICAO EUC requirements.

Second, it is important to include qualified Programs that can either individually or collectively provide geographically diverse offsets, including those that can provide

⁷ Air Transport Action Group, “*Air Transport and the Sustainable Development Goals*” First Edition October 2017, found at <https://www.atag.org/our-publications/latest-publications.html>.

⁸ One way to address leakage with site-scale REDD+ activities is to “nest” the project in a nationally implemented program which includes alignment of the project baseline with a national baseline, jurisdiction-wide monitoring, and obtaining required governmental approvals to ensure proper accounting. Some types of REDD+ project types, such as planting new trees, don’t present the same risk of leakage and therefore don’t require nesting to address leakage.

REDD+ units. This will give airlines and other aircraft operators the opportunity to support emission-reducing projects for different communities they serve.

Third, as the term “REDD+” is defined broadly to include the planting of trees, better management of forests, and the protection of existing forests to prevent deforestation, each of these categories can provide REDD+ credits consistent with the ICAO EUC. Historically, there have been more Programs that have focused on the planting of new trees to avoid the complexity of demonstrating no “leakage” (ARR – Afforestation, Reforestation and Revegetation). However, as discussed above, the pace of deforestation is a significant concern and the protection of such forests is recognized as an important climate solution in addition to providing other environmental and sustainable development benefits. Consequently, Programs that properly address potential “leakage” through management approaches and procedures to assess, mitigate, monitor and account for leakage should be recognized in the Program review process.

In sum, we appreciate the work that the TAB and ICAO Council are doing to assess Programs and their offerings against the EUC. As ensuring sufficient supply of emissions units is critical to the success of CORSIA, we urge the TAB and ICAO Council to ensure that all Programs that meet the EUC criteria and requirements are approved, including market-ready Programs that can provide REDD+ units generated at either a jurisdictional scale or from site-scale activities that are nested.

Thank you for your consideration. Please let me know if you have any questions regarding our comments.

Sincerely yours,



Nancy N. Young
Vice President, Environmental Affairs

Comment Set #13

Name:

Kelley Hamrick and John Verdick

Organization:

The Nature Conservancy

Date of receipt:

5 September 2019

From: Kelley Hamrick <kelley.hamrick@TNC.ORG>
Sent: 5-Sep-19 18:54
To: Office of the Environment
Cc: John Verdieck
Subject: The Nature Conservancy - Public Comments for Emissions Units Programmes
Attachments: The Nature Conservancy - Public Comments.docx; The Nature Conservancy - Public Comments.pdf

Dear ICAO staff,

Please find attached TNC's public comments for the fourteen programs applying for eligibility in CORSIA. Thank you for the opportunity to provide feedback, and please let us know if you would like greater clarity on any of our comments.

Best regards,
Kelley

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THE NATURE CONSERVANCY: PUBLIC COMMENTS FOR EMISSIONS UNITS PROGRAMMES

EXECUTIVE SUMMARY

If the aviation sector were a country, it would be one of the top 10 emitters of carbon dioxide per year on Earth. To help deliver its promise of carbon-neutral growth from 2020, international aviation is looking, in part, to carbon offsets. The Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) could become the largest market for offsets in the world, generating demand for up to 3 billion metric tons of emission reductions over CORSIA's 15-year span. CORSIA's cap on emissions at 2020 levels is a significant achievement for international aviation and for the climate, and a significant step towards the sector playing its full role in delivering the targets set-out in the Paris Climate Change Agreement. We recognize the enormous work, both technical and political, that has gone into CORSIA to date.

The fourteen offset credit programs that applied for CORSIA eligibility in the first round showed a range of thoughtful responses to the Emissions Unit Criteria (EUCs). It's notable that all but two of the programs included methodologies for natural climate solutions, which can offer up to 30% of the needed mitigation globally through 2030, but currently receive less than 2% of the public climate finance globally. Several program applications included methodologies for reducing emissions from the forest sector, which has the largest mitigation potential of the natural climate solutions.

Of the responses we reviewed, several demonstrated comprehensive programmatic design and elements aimed at ensuring high offset integrity: the VCS Program (managed by Verra), The Gold Standard, Climate Action Reserve (CAR), American Carbon Registry (ACR), and British Columbia Offset Program.

Many of the remaining programs also included EUC-compliance plans but had not yet implemented all those elements. This includes the Forest Carbon Partnership Facility (FCPF), which intends to have verification guidelines and a registry in place before the end of the year; the Global Carbon Trust (GCT), which intends to have a registry and issuance of the first project credits by late 2019; and Nori, which plans to launch a public registry platform in Q1 or Q2 2020. These planned elements should be finalized *before* any potential approval by the Technical Advisory Body (TAB).

A number of programs (some the same as above) also did not fully respond to all of the EUC questions. We encourage these programs to take the steps needed to meet the EUCs and reapply once those criteria are met. These are: GCT, State Forests of the Republic of Poland (Poland), Nori, REDD.plus, China GHG Voluntary Emission Reduction Program (CCER), Thailand Greenhouse Gas Management Organization (T-VER), and myclimate.

Finally, we were not able to review the Clean Development Mechanism (CDM), as the program did not submit a complete application. We recommend against approval until further details can be shared and request a public comment period for review of that application (once submitted).

We would like to reiterate our support for the EUC review process and thank the TAB for their work in ensuring CORSIA only allows high-integrity offsets into the soon-to-be world's largest offset market.

This public comment period represents a significant and positive step towards the operationalization of CORSIA. There is great interest and commitment from civil society and across the private sector, non-profit organizations, and governments to see CORSIA's promise fully realized, with integrity.

We have analyzed each of the fourteen program applications for their technical merit in fulfilling the EUCs. Below, we highlight several concerns and positive aspects of the program approaches to specific EUCs, including those relating to program governance, additionality, leakage, and more. In **Annex I**, we review the programs using the TAB's Public Comment Template Form.

INCOMPLETE OR UNFINISHED PROGRAMMATIC DESIGN OR OFFSET INTEGRITY ELEMENTS, *EUCs 3.1 - 4.8*

Many programs have submitted applications that include incomplete or unfinalized program design and offset integrity elements. We therefore were unable to sufficiently assess the environmental integrity of these programs, as there is nothing substantive to review. These programs, if approved, represent a high-risk to public trust in CORSIA and a high-risk to the integrity of CORSIA itself. We do not recommend the TAB approve any programs where the program design elements remain unfinished during the TAB review. Instead, we recommend that these programs apply again at a later time, once these design elements have been finalized.

In some cases, the program states that some design or offset integrity elements will be completed within this TAB review period. If that is the case, we call for another public comment period then so that there is an additional review of those newly-added elements. These elements, which were checked as finalized on the application, but later included explanatory text to the contrary, include:

- Programs without complete, peer-review methodologies;
- Programs without public participation provisions;
- Programs without registries;
- Programs without permanence or leakage plans for specific methodologies;
- And more (**see Annex I for full list**).

As a specific example, GCT mentioned that it plans to develop a carbon capture and storage methodology but has “not taken decision on how the potential reversal will be addressed.” This is a clear example of something that should already be developed

before the TAB approves such a program. It is difficult to evaluate the approach to permanence within this methodology without such text already being made public. We would recommend that the TAB does not approve this or other proposed new methodologies; rather, GCT should reapply for consideration by the TAB once these methodologies have been finalized.

Finally, *all* programs have uncertain double claiming policies, as these rules depend largely on the outcomes of the Article 6 negotiations. We would like to see the TAB address this comprehensively; or allow another review period for double claiming only, once the Article 6 decisions have been finalized.

AUTHORITY OVER PROGRAMMATIC DESIGN AND/OR OFFSET INTEGRITY ELEMENTS, *EUCs 3.1 - 4.8*

Many programs – Gold Standard, T-VER, CCER, GCT, Verra’s VCS, ACR, myclimate, REDD.plus – use some or all methodologies developed under another program (e.g. CDM methodologies or UNFCCC policies). The TAB review should ensure that these programs employ additional review or assessment of these methodologies (like Gold Standard, some Verra methodologies, and ACR) to ensure the applying programs have sufficient authority over ensuring offset integrity for use within CORSIA.

For example, on its website, the American Carbon Registry states that it “generally accepts methodologies and tools approved for use by the CDM. However, project proponents wishing to use a CDM methodology should first consult ACR for a review to include applicability as well as clarifications and/or conditions for its use for registration on ACR.” This shows that the program has authority over ensuring EUCs are met, in case the CDM methodologies do not meet the EUCs.

In contrast, myclimate does not use rules for the majority of its answers to the program design and offset integrity EUC questions. Instead, the program refers to the websites of the CDM, Plan Vivo, the Gold Standard, and the Federal Office of the Environment of Switzerland. In this case, myclimate does not appear to have authority over any future design or integrity decisions within those programs.

Similarly, the REDD.plus program refers extensively to the UNFCCC decisions in the description of its programmatic and offset integrity design. However, as a private sector Limited Liability Corporation, the program is a separate entity from the UNFCCC and has no agency over that process, including any future decisions about REDD+. The program makes no reference to having a mechanism in place to develop its own policies if and when needed and does not provide evidence of any staffing structure (such as a board, CEO or president, or other staff) who would undertake such policy development.

LEGAL NATURE AND TRANSFER OF UNITS, *EUC 3.5*

Both the REDD.plus and GCT applications refer the questions of legal nature and transferability of units to the registry provider, IHS Markit. However, this is insufficient to guarantee this EUC, as IHS Markit states on its website: "For the avoidance of doubt, Markit is under no obligation to verify or otherwise enquire into the validity of, or legal title to, the Units." These two programs thus need to provide additional explanation and proof around legal title to the proposed offset credits.

GOVERNANCE, EUC 3.7

The TAB should not approve programs before key unfinished EUC elements are complete. Several programs meet the requirement to have been continuously governed and operational for at least the last two years, but are still missing integral experience in designing and operating a program.

This includes the Global Carbon Trust, which has not yet finalized any methodologies and completed its registry (due late 2019); Nori, which has not yet finalized any methodologies and plans to complete its registry (due Q1 or Q2 2020); and REDD.plus, which has registered as a LLC in 2019.

A related point is that REDD.plus does not appear to have a board, president or any staff, and thus we could not find sufficient evidence that they have been continuously governed and operational for the required 2-year period. There is also no clear plan for what might happen if the REDD.plus program ends (the program only refers to the UNFCCC decisions around REDD+, which are separate from the REDD.plus LLC).

In contrast, other programs have been operational for much longer than two years, and have not only established program governance and other EUC elements, but also a wealth of useful experience in updating and refining these criteria over time. These programs include the Winrock International's ACR (since 1996), CAR (since 2001), the Gold Standard (since 2003), CDM (since 2006), Verra (since 2006), and FCPF (since 2007).

DO NO HARM AND SAFEGUARDS, EUC 3.9, 4.8

Ensuring that emissions reductions activities do no harm and implement appropriate safeguards is critical to any program. However, the T-VER program does not provide evidence that the program complies with social and environmental safeguards, or publicly discloses the institutions, processes, and procedures related to environmental and social risks. Likewise, the State Forests of the Republic of Poland application does not provide thorough explanations for evidence that the program complies with social and environmental safeguards, merely stating "the program benefits both the environment and the society."

Other programs employed a variety of explanations and assurances of meeting EUC 4.8. In particular, we'd like to highlight the safeguards employed across all REDD+ programs (REDD.plus, FCPF, VCS JNR) which follow local laws and regulations as well as

guidelines under the UN Framework Conference for Climate Change, including the REDD+ Cancun Safeguards.¹ These globally-agreed REDD+ safeguards require:

- a) That actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements;
- b) Transparent and effective national forest governance structures, taking into account national legislation and sovereignty;
- c) Respect for the knowledge and rights of indigenous peoples and members of local communities;
- d) The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities;
- e) That actions are consistent with the conservation of natural forests and biological diversity, ensuring that actions are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits;
- f) Actions to address the risks of reversals; and
- g) Actions to reduce displacement of emissions.

Additionally, FCPF requires additional safeguard operational rules and regulations from the World Bank. These criteria include requirements to meet the World Bank social and environmental safeguards and to develop an appropriate Feedback and Grievance Redress Mechanism. Verra's VCS JNR also requires that REDD+ programs include grievance redress mechanisms for any individuals or communities who feel their rights have been violated. Finally, both these programs require that the REDD+ program must report on the implementation of their safeguards against rights violations in order to receive credit for reduced deforestation results. In our opinion and on the basis of the evidence reviewed, these programs clearly meet the 4.8 EUC requirements.

SUSTAINABLE DEVELOPMENT, *EUC 3.10*

All programs seemed to meet the sustainable development criteria, though approaches ranged from identifying and measuring benefits in the context of the Sustainable Development Goal (SDG) to creating a separate certification or standard to measure co-benefits (like Verra's Sustainable Development Verified Impact Standard, SD VISta) or to including sustainable development requirements are baked into the methodology development process.

Several programs – REDD.plus, FCPF, Verra's VCS JNR – require that the Cancun safeguards be addressed and implemented to ensure any REDD+ actions enhance other social and environmental benefits. They also require that information must be provided on how this has been achieved. The FCPF calls for additional monitoring and reporting

¹ UNFCCC. (2010) FCCC/CP/2010/7/Add.1 Appendix I: "Guidance and safeguards for policy approaches and positive incentives on issues relating to reducing emissions from deforestation and forest degradation in developing countries; and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries."
<https://unfccc.int/resource/docs/2010/cop16/eng/07a01.pdf#page=12>.

of co-benefits, with recommendations to follow new or existing monitoring and reporting guidance on co-benefits developed by the UNFCCC or Convention on Biological Diversity or other international platforms.

While many emissions reductions activities will also support varied sustainable development outcomes, we especially want to highlight the well-documented benefits from natural climate solutions. These activities, including REDD+, produce significant environmental co-benefits—such as improved soil quality, cleaner air and water, higher coastal resilience and biodiversity conservation—and social co-benefits for a myriad of stakeholders, including indigenous peoples and local communities. The latter can include strengthened recognition and respect for customary land and resource tenure rights as well as support to rural smallholders with transition to more sustainable and productive agricultural practices.

ADDITIONALITY, EUC 4.1

Additionality is a key component of credible carbon offsets. All programs must include strong additionality criteria. Programs typically ensure additionality by requiring projects to meet an additionality test. Common additionality tests include a legal or regulatory test (to ensure project activities are not already required by law); a financial test (to ensure the activity would not be profitable without carbon offset revenue); a barriers test (to ensure the activity would not happen due to other non-financial barriers); and the common practice test (to ensure the activities differ from other commonly-used practices).

Most of the programs appear to have adequate additionality requirements. The American Carbon Registry, for example, has procedures in place to ensure projects demonstrate additionality. The validation and verification bodies evaluate each project's additionality assessment to ensure that all claimed emission reductions are indeed surplus to "business as usual." All ACR projects must either: exceed an approved performance standard and a regulatory additionality test or pass a three-pronged additionality test. If a project is found to be non-additional after offset credits are issued, then the project would be required to compensate for any over-issuance.

The REDD+ methodologies advanced by Verra's VCS JNR, FCPF, REDD.plus also meet these criteria, as the baselines are developed in line with UN guidance to measure results and demonstrate additionality. All countries engaging REDD+ must also develop a national REDD+ strategy and action plan to communicate their approach for implementing REDD+ and delivering results. This national strategy considers the country's national context and identifies the drivers of deforestation that would have led to an increase in emissions if the REDD+ activities had not occurred.

PERMANENCE, EUC 4.5

Many programs acknowledge that permanence can be a concern for all sectors but provide additional requirements to mitigate potential reversal risks of terrestrial sequestration projects and carbon capture and storage projects.

However, while GCT plans to develop a CCS methodology, it has “not taken decision on how the potential reversal will be addressed.” We would like to be able to review these plans before this is approved for CORSIA. Similarly, more explanation is needed from Nori’s submission, which ensures ten-year permanence and encourages longer-term permanence by “re-enrolling/re-registering” projects. It is important to understand re-enrolling/re-registration is promoted, and how permanence is addressed in the event that projects are not re-enrolled/re-registered. The State Forests of the Republic of Poland also need to better detail how the program addresses the risk of reversal, as the application currently provides insufficient information or shifts responsibility to CORSIA.

In contrast, Verra’s VCS JNR, for example, requires an assessment of the potential risk of reversal of emission reductions, avoidance, or carbon sequestration. These findings are used to calculate the contribution of each project, nested VCS REDD+ project and/or VCS JNR program to the respective pooled buffer account. The jurisdictional pooled buffer account holds non-tradable buffer credits to cover the non-permanence risk associated with JNR programs and nested REDD+ projects.

All national and subnational REDD+ programs are required to address potential risk of reversals under the REDD+ Cancun Safeguards adopted under the UN. The scale of REDD+ implementation, in line with national strategies, promotes long-term sustainability and permanence of REDD+ emission reductions. REDD+ programs have years of experience and guidance on mitigation measures to address any potential risk of reversals. For example, some REDD+ programs, including the FCPF and Verra’s VCS JNR, employ a buffer system (i.e., reserves of reductions which are not transferred but which can be accessed to compensate for any reversals).

Other programs with non-REDD+, AFOLU methodologies also include adequate procedures to ensure permanence. The American Carbon Registry, for example, mitigates reversal risks through legally binding AFOLU Carbon Project Reversal Risk Mitigation Agreements and Buffer Pool Terms and Conditions. The Agreement outlines requirements to: assess risk, mitigate risk through the ACR mechanism, comply with risk mitigation requirements, and compensate for reversals as applicable. These buffer pool and risk mitigation procedures allow ACR to demonstrate that permanence provisions can fully compensate for the reversal of emission units used under CORSIA. The Gold Standard and the Climate Action Reserve also utilize buffer pools to ensure permanence in this way.

LEAKAGE, EUC 4.6

The UNFCCC Warsaw Framework reduces the risk of leakage by requiring the establishment of a national forest monitoring system and the preparation of national REDD+ strategies and action plans that address the drivers of deforestation and forest degradation, land tenure and forest governance issues, as well as reversals at the national or subnational scale.

By implementing REDD+ at the national scale, countries are required to address the drivers of deforestation and to adopt policies and regulations to ensure inter alia that there

is no potential increase in emissions within the country. Further, as correctly outlined in the REDD.Plus application, the UNFCCC REDD+ Framework also “requires national scale reporting, GHG Inventories, and Forest (Emission) Reference Levels.” The FCPF also requires that potential displacement from the program activities are identified, assessed, and addressed in a strategy to mitigate or minimize the risk of leakage.

Leakage from non-REDD+ agriculture, forest, and other land-use (AFOLU) activities can also be addressed at a site-specific level. For example, VCS submitted its REDD+ and IFM methodologies as part of its JNR program; however, it also submitted stand-alone activities under its Afforestation, Reforestation and Revegetation (ARR), Agricultural Land Management (ALM), Avoided Conversion of Grasslands and Shrublands (ACoGS), and Wetlands Restoration and Conservation (WRC) methodologies. For those methodologies, the projects must address the risk of emissions leakage, market leakage, ecological leakage and activity-shifting leakage. The program includes a requirement to monitor leakage, as part of the monitoring plans for all projects for which there is a potential risk.

IMPORTANCE OF ENSURING NO DOUBLE COUNTING OR CLAIMING OF UNITS, *EUC 4.7*

Double Counting

In 2015, countries under the United Nations climate negotiations adopted the Paris Agreement, agreeing to limit global temperature rise to well below 2° Celsius and to increase resilience to climate change. Each country has put forward their proposals for meeting these global goals in their nationally determined contributions (NDCs). Consequently, all emissions reductions proposed for emissions trading with other countries or airlines under CORSIA must be recognized by the national government and transparently accounted for in order to ensure the avoidance of double counting. CORSIA requires programs to have provisions to ensure that emission reductions are only counted once towards a mitigation obligation, which is applicable to all sectors and offset types.

In line with the EUCs, all greenhouse gas programs must have a functioning registry for tracking emission reductions issued and claimed in order to ensure the avoidance of double counting. However, REDD+ activities must meet an additional requirement across any programs: UNFCCC decisions require that REDD+ results be recorded in the Lima REDD+ Information Hub. This provides a mechanism to ensure that all REDD+ results, including those transferred to CORSIA, can be identified and tracked against national progress under the Paris Agreement.

Utilizing an additional registry is compatible with the Warsaw Framework for REDD+. For example, REDD.Plus utilizes IHS Markit as their registry administrator. REDD+ units generated under other programs – FCPF and Verra’s VCS JNR – also effectively manage the risk of double counting. Those programs also transparently record REDD+ units in a registry and are subject to additional provisions to ensure no double counting of emission reductions, including double issuance, use or selling.

For example, the VCS Program also requires projects (from “nested” REDD+ or other sectors) to secure “any required approvals from the appropriate government entity, including, at a minimum, a commitment to ensure that any potential double counting with any relevant NDC is addressed (e.g., via a corresponding adjustment)”. REDD+ units included in VCS’s application are assigned serial numbers, recorded in their project database and registry, subject to automatic check and periodically screened for discrepancies or duplication.

One clarification should be made regarding REDD.plus’ statement around double counting:

“Thus, unless such [voluntary standards, such as the World Bank’s FCPF, VCS, GS, CAR, ACR, Plan Vivo, etc.] units have been canceled and exchanged for REDD.plus results units (RRUs) under REDD.plus they will effectively be double counted and fail to meet CORSIA environmental safeguards.”

Any program that meets the EUCs – both around double counting and other criteria – should be able to create or maintain methodologies across any sector, including forestry and REDD+ activities.

Double Claiming

All greenhouse gas programs should develop and institute updated rules to ensure no double claiming of emission reductions post-2020 in the context of the Paris Agreement and countries’ NDCs. Double claiming is extremely problematic, as it creates the illusion that we are getting twice as many emission reductions as we actually achieve.

The EUCs and Appendix A to the CORSIA application are clear: Programs should provide attestations from governments indicating that the underlying mitigation “is not also counted toward national target(s) / pledge(s) / mitigation contributions / mitigation commitments.”

However, it is unlikely that host countries will provide such an attestation, or indeed any official position on selling emissions reductions, until the Article 6 negotiations are concluded. As such, several programs noted that final approaches towards double claiming will depend on the on the outcome of the Article 6 negotiations.

While most applications noted their willingness to abide by any to-be-developed double claiming rules in their applications, the Gold Standard, ACR, CAR, GCT, Verra’s VCS, and FCPF provide specific examples of how they intend to begin addressing this risk (but maintaining flexibility around Article 6 outcomes). The GCT, for example, has discussed a letter of attestation with the government of Qatar. It also recommended ICAO hold capacity-building workshops with CORSIA-signatory countries and airlines to address double claiming and accounting issues, which we would also support.

The Gold Standard, CAR, and ACR) mentioned their work towards alignment with the [Guidelines on Avoiding Double Counting for CORSIA](http://www.adc-wg.org) (www.adc-wg.org), “Guidelines on Avoiding Double Counting for CORSIA”. It should be noted that the civil society participants in the guidelines working group are of the view that to maintain integrity, host countries need to make corresponding adjustments when authorizing the use, for CORSIA, of credits issued for emissions reductions and removals whether those originate inside or outside the scope of NDCs.

Gold Standard and CAR estimate their procedures will be made public by December 2019. CAR also mentioned it will develop a new website with CORSIA-specific information, including guidelines about procuring a Letter of Authorization and other key elements to address the risk of double claiming. Verra did not reference specific rules, but mentioned a willing to update its current rules to address double claiming risks to better address those challenges post-2020. The FCPF mentions its General Conditions requirements for no double claiming, which states that any emissions reductions may only be claimed once (Section 5.02 g).

Conversely, several submissions did not provide specific information about any relevant policies and procedures to ensure credits are only claimed once towards a mitigation obligation. This includes the Nori, myclimate, British Columbia, and State Forests of the Republic of Poland. Thailand’s T-VER mentions that it expects to have policies in place to avoid double claiming by the end of 2019 but does not provide specific examples or text for this.

The CCER program application raises a further double-claiming concern. It appears that the majority of the CCER program methodologies are also CDM methodologies. It is possible that the CCER program could be issuing credits for the same projects and same reductions that have already been certified by the CDM. The CCER program application should be strengthened by providing clear, independently verifiable information that such double-issuance (and double-cancellation) has not occurred and should describe the steps the program is taking to ensure that these do not occur in the future.

Programs should be asked to confirm their willingness and ability to meet the EUC requirements on double claiming, while the TAB should recognize final decisions may change pending Article 6 decisions. Ideally, the TAB should re-confirm programs’ plans to avoid double claiming once Article 6 negotiations have finalized.

CONCLUSION

If the aviation sector were a country, it would be one of the top 10 emitters of carbon dioxide on Earth. To help deliver its promise of carbon-neutral growth from 2020, international aviation will have to look, in part, to carbon offsets. Experts estimate that nearly three fourths of the anticipated increase in international aviation emissions above 2020 levels could be covered by the market-based measure, CORSIA.² This could

² *Environmental Defense Fund. “Reducing aviation’s climate impact”.* <https://www.edf.org/climate/aviation>

generate demand for up to 3 billion metric tons of carbon credits over CORSIA'S 15-year span.

With such demand, it is unsurprising that many programs seek to transition their carbon offsets into CORSIA. However, while many of the fourteen applications have plans to address CORSIA's EUCs, not all have implemented them.

Based on our review of these programs, we would recommend that the TAB take careful note of the comprehensive programmatic design and elements put forward by Verra, The Gold Standard, Climate Action Reserve, American Carbon Registry, and British Columbia, and request that these programs supplement their applications with greater detail on how they plan to assure, through attestations, that their units are not also being counted by host countries.

The TAB should examine the remaining programs for application completeness and ensure that any unanswered questions receive full responses from those programs. The programs should also demonstrate the operationalized elements to each of the EUCs; in cases where the EUCs remain pilots or unfinished, the TAB should not recommend those programs for this round of approval. Please see Annex I for a list of specific concerns.

This includes recommendations that programs finalize the implemented of EUC elements such as the FCPF, which intends to have verification guidelines and a registry in place before the end of the year; the Global Carbon Trust, which intends to have a registry and issuance of the first project credits by late 2019; and Nori, which plans to launch a public registry platform in Q1 or Q2 2020.

Many programs (some the same as above) also did not fully respond to all of the EUC questions. We encourage these programs to take the steps needed to meet the EUCs and reapply once those criteria are met: Global Carbon Trust, State Forests of the Republic of Poland, Nori, REDD.plus, CCER, T-VER, and myclimate. Unfortunately, we were not able to review the Clean Development Mechanism, as the program did not submit a complete application. We recommend against approval until further details can be shared and request a public comment period for review of that application (once submitted).

In sum, we are delighted to see so many programs apply. Even if programs do not meet the EUCs at this time, we would encourage all to consider steps they can make to meet the EUCs in the future. CORSIA will need to use a full range of solutions to address emissions' growth from international aviation.

In particular, we encourage CORSIA and participating airlines to take a closer look at natural climate solutions, which represent near-term and cost-effective climate solutions. It's notable that all but two of the programs included methodologies for natural climate solutions, and that several program applications included REDD+ methodologies, which has the largest mitigation potential of the natural climate solutions. Including REDD+ as an eligible offset option under ICAO's Carbon Offsetting and Reduction Scheme for

International Aviation (CORSIA), provides a triple benefit: a secure supply of high-quality offsets that can help aviation meet its climate goals, a significant support for investment in forest protection, and benefits to local communities and developing countries.

Finally, we would like to request that ICAO and the CAEP consider ways to re-assess the Emissions Units Criteria and the approved programs every ten years. As more countries, sectors, and companies address emissions, there will be a ramping up of new technologies, policies, and other market drivers that might change the applicability of the EUCs or necessitate the addition of new EUCs to ensure continued environmental integrity.

ANNEX I. TAB PUBLIC COMMENT FORM

Commenter Name: Kelley Hamrick and John Verdieck

Commenter Organization: The Nature Conservancy

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
All	4.7	Double claiming	All programs have uncertain double claiming policies, as these rules depend largely on the outcomes of the Article 6 negotiations. We would like to see the TAB address this comprehensively; or allow another review period for double claiming only, once the Article 6 decisions have been finalized.
Forest Carbon Partnership Facility	3.4	Identification and Tracking	According to the FCPF, the registry should be operational by November 30, 2019. The latest update available, here , shows more details around the Carbon Asset Trading System (CATS), which is intended to go live in late September, 2019. This should be in place and public before the TAB completes its review.
Forest Carbon Partnership Facility	3.6	Validation and Verification procedures	According to the FCPF, the Verification Guidelines will be made public by Sept 30, 2019. The document appears near-finalized (with the current draft available here), but should be completed and public before the TAB completes its review.
Global Carbon Trust	3.1	Clear Methodologies and Protocols, and their Development Process	Currently, there are no methodologies developed by GCT. GCT does recognize CDM, VCS, Gold Standard and CAR methodologies but allows project developers to “simplify or streamline” those methodologies. More detail is needed about how/if GCT conducts additional assessment of CDM, VCS, Gold Standard and CAR methodologies and explain how it will allow for simplification of those methodologies while still meeting the EUCs.

Global Carbon Trust	3.5	Legal Nature and Transfer of Units	Refers to the registry provider, IHS Markit, to ensure legal nature and transferability of the units. This is insufficient, IHS Markit only states "For the avoidance of doubt, Markit is under no obligation to verify or otherwise enquire into the validity of, or legal title to, the Units."
Global Carbon Trust	3.7	Program governance	According to the GCT, the registry should be developed in October 2019 and the first project registration and issuance should happen in 2019 as well. Yet there are currently no final, public methodologies. The registries and methodologies should be in place and public before the TAB completes its review.
Global Carbon Trust	4.1	Are additional	"GCT is <i>in the process of developing</i> its project-specific simplified methodologies. The methodology development process is based on the demand from project owner who submits the new project idea to GCT. So far, no methodology is approved by GCT." The TAB should not approve of any programs without already-defined, public methodologies in place.
Global Carbon Trust	4.5	Represent permanent emissions reductions	GCT mentions it plans to develop a CCS methodology but has "not taken decision on how the potential reversal will be addressed." It is impossible to evaluate the approach to permanence within this methodology without such text already being made public. The TAB should not approve of any programs without already-defined, public methodologies in place.
myclimate	3.1, 3.3, 3.5, 3.6, 3.8, 3.9, 4.1, 4.3, 4.8	Multiple	Myclimate does not create its own methodologies; instead the program refers to external "standard bodies" that it uses, which includes the CDM, Plan Vivo, Gold Standard, and the Federal Office of the Environment of Switzerland. For the majority of EUCs, the program refers to guidance and rules developed by these external standard bodies.

			<p>This raises an important question about how myclimate could ensure the quality of these design and integrity elements in the future – it seems likely that the program would not have any real authority over those decisions. In that case, it is our recommendation that myclimate does not qualify as a program that can ensure program design and carbon offset integrity elements in line with those required by CORSIA; instead, the external standard bodies referred to that applied – CDM and the Gold Standard-- should be considered in their own right, and not through myclimate.</p> <p>This also raises a question about conflict of interest: as myclimate engages in project development, there is a clear conflict of interest with getting approved into CORSIA.</p>
myclimate	3.5, 3.7, 3.10, 4.3	Multiple	Sections 3.5, 3.7, 3.10 and 4.3 indicate that the program meets the relevant criteria without providing evidence, or summaries of how the criteria are achieved.
REDD.plus	3.5	Legal Nature and Transfer of Units	Refers to the registry provider, IHS Markit, to ensure legal nature and transferability of the units. This is insufficient, IHS Markit only states "For the avoidance of doubt, Markit is under no obligation to verify or otherwise enquire into the validity of, or legal title to, the Units."
REDD.plus	3.7	Paragraph 2.7.2, 2.7.3, 2.7.4	REDD.plus has registered as an LLC in 2019, which does not seem to meet the two-year criteria. A related governance issue with REDD.plus is that there does not appear to be a board, president or any staff, which puts the governance of the program into question; nor is there a clear plan for what might happen if the REDD.plus program ends (the program only refers to the UNFCCC decisions around REDD+, which are separate from the REDD.plus LLC).
T-VER	4.8	Safeguards	T-VER program does not provide evidence that the program complies with social and environmental safeguards, or

			publicly discloses the institutions, processes, and procedures related to environmental and social risks
T-VER	3.7, 3.8, 4.1, 4.3	Multiple	Many explanations are missing or insufficient to understand how the application meets the EUCs. More information should be requested by the TAB.
State Forests of the Republic of Poland	4.8	Safeguards	The State Forests of the Republic of Poland application does not provide satisfactory explanations for evidence that the program complies with social and environmental safeguards, merely stating “the program benefits both the environment and the society.” This should not be sufficient evidence for CORSIA.
State Forests of the Republic of Poland	4.5	Represent permanent emissions reductions	The State Forests of the Republic of Poland also need to better detail how the program addresses the risk of reversal, as the application currently provides insufficient information or shifts responsibility to CORSIA.
State Forests of the Republic of Poland	3.1, 3.4, 3.5, 3.6, 3.7, 3.8, 3.10, 4.1, 4.2, 4.3	Multiple	Many explanations are missing or insufficient to understand how the application meets the EUCs. More information should be requested by the TAB.
Nori	4.5	Represent permanent emissions reductions	More explanation is needed from Nori’s submission on permanence, which ensures ten-year permanence and encourages longer-term permanence by “re-enrolling/re-registering” projects. It is important to understand re-enrolling/re-registration is promoted, and how permanence is addressed in the event that projects are not re-enrolled/re-registered.
Nori	3.1, 3.4	Identification and tracking; methodological development	Nori should finalized any methodologies (currently there are 0 final methodologies) and plans to complete its registry (due Q1 or Q2 2020) prior to approval by CORSIA.

Comment Set #14

Name:

Charlie Williams

Organization:

Clean Air Action Corporation

Date of receipt:

5 September 2019

From: Catherine Campbell <catherine.b.campbell@gmail.com>
Sent: 5-Sep-19 19:17
To: Office of the Environment
Cc: Charlie Williams
Subject: CAAC Comments on TAB Assessment
Attachments: CAAC Comments on TAB Assessment.pdf

Good afternoon,

Please find attached comments from Clean Air Action Corporation ("CAAC") on the applications for the TAB Assessment of emissions unit programs.

Please let us know if you have any questions.

Thank you,
Catherine

--

Catherine Campbell
(202) 309-1356
catherine.b.campbell@gmail.com
Skype: catcampbell03



September 5, 2019

Via E-Mail

Technical Advisory Body

ICAO

officeenv@icao.int

RE: Comments on Emissions Unit Program Assessment Applications

To Whom It May Concern,

On behalf of the Clean Air Action Corporation (“CAAC”), please find enclosed our comments on the Emissions Unit Programs’ Assessment Applications. CAAC, through The International Small Group and Tree Planting (“TIST”) Program, represents 90,000 subsistence farmers that have planted over 18,000,000 trees on unused and/or degraded land and generated over 2.3 million carbon credits under Verra’s VCS Program. Based on this experience, we believe that the VCS Program’s robust and rigorous standards are well aligned with the Emissions Unit Criteria (“EUC”) and produce carbon credits of the highest integrity.

Many of the applicants highlighted their methodologies for REDD+ projects. It is important to note that afforestation/reforestation (“A/R”) projects, such as TIST, are among the most effective strategies to mitigate climate change due in part to the significant acreage of degraded and unused land in the world. The TIST Program empowers subsistence farmers to improve their livelihoods, local environment, and global climate by planting trees on degraded and/or unused land and practicing conservation farming. The potential for these types of A/R projects to help capture atmospheric carbon is substantially higher than REDD+ projects that must rely on existing forests.

Thank you for your consideration and please do not hesitate to contact us with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie Williams".

Charlie Williams

Vice President

CharlieWilliams@CleanAirAction.com

Enclosure

cc: John Ambler/CAAC (via e-mail)
Catherine Campbell/I4EI (via e-mail)

TAB Public Comment Template Form

The public is invited to submit comments on the responses to the call for applications, including regarding their alignment with the emissions units criteria (EUC).

The public is requested to use this form to provide structured comments on the responses to the call for applications that were submitted for assessment by the TAB. Public comments regarding the information submitted may be published online, along with the commenter name and organization.

Commenter Name: Charlie Williams

Commenter Organization: Clean Air Action Corporation, co-sponsor of The International Small Group and Tree Planting (“TIST”) Program

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Verified Carbon Standard (VCS) Program	Parts 3 and 4	Eligibility Criteria (paragraph 3)	<p>CAAC’s TIST Program represents 90,000 subsistence farmers and has 14 Projects with 28 successful verifications (CCB Community Gold), and another 6 verifications in the pipeline.</p> <p>Based on this experience and an excellent history of working with Verra, we believe that the VCS Program’s standards are well aligned with the Emissions Unit Criteria (“EUC”) and produce carbon credits of the highest integrity.</p>
Verified Carbon Standard (VCS) Program	Section 3.9 and Section 4.8	Safeguards System (paragraph 2.9) And Sustainable Development Criteria (paragraph 2.10)	Verra’s VCS Program offers the most robust and rigorous voluntary GHG crediting program. The VCS Program’s holistic approach to its assessment process ensures that its projects consider the local communities that are implementing and/or affected by the project. Verra recognizes that land degradation, biodiversity loss, and climate change are connected and directly impact people’s lives. This is evident by their integration of the Climate, Community & Biodiversity Standards into their platform. Verra’s project requirements continue to integrate sustainable

			development considerations into project design.
Verified Carbon Standard (VCS) Program	Part 2 and Table 1	Scope Considerations (paragraph 2.2)	As recently discussed in the widely-publicized <i>Science</i> article ¹ , afforestation and reforestation (“A/R”) projects are among the most effective strategies to mitigate climate change. The VCS Program’s support of forestry projects, in particular A/R projects, is critical to addressing climate change because trees need to be part of the solution.
Verified Carbon Standard (VCS) Program	Section 3.3(b) and 4.3(d)	Offset Credit Issuance and Retirement Procedures (paragraph 2.3)	Because of the necessary lag time for trees to sequester carbon, many A/R projects had to start early in order to participate in CORSIA. The VCS Program’s flexible approach with respect to a project’s start date would recognize the individual circumstances of organizations that began operating early in anticipation of CORSIA.
Verified Carbon Standard (VCS) Program	Sections 3.1 and 3.8	Clear Methodologies and Protocols and Development Process (paragraph 2.1)	The VCS Program removed many of the barriers to entry that small project developers faced with early crediting programs. Because of VCS’ attention to its project developers and its streamlined and transparent processes, project developers around the world are able to participate in the global carbon market and create benefits for their local communities.
Verified Carbon Standard (VCS) Program	Section 4.5	Permanence (paragraph 3.5)	The VCS Program has mitigated the potential risk of reversal of emissions reductions in AFOLU projects by creating an AFOLU pooled budget account that holds non-tradable buffer credits. The design of grouped projects under VCS methodologies mitigates many of the environmental and social risks in forestry due to decentralized project activities. Substantial benefits that trees produce in such AFOLU projects further protect them from harm.
Verified Carbon Standard (VCS) Program	Part 2, Table 1, and Section 4.6	Leakage (paragraph 3.6)	The VCS Program’s leakage analysis is built into the program, which has incentivized project developers to design robust projects with little to no leakage. As discussed above, Verra encourages its

¹ “The Global Tree Restoration Potential”, *Science*, 05 Jul 2019, Vol. 365, Issue 6448, pp. 76-79.

			project developers to work closely with the local communities to design strong projects that not only protect the global climate, but also improve the livelihoods of the communities.
Gold Standard	Parts 3 and 4	Scope Considerations (paragraph 2.2)	While we have only recently sought certification under The Gold Standard, we fully support their participation in CORSIA as an Emissions Unit Programme. The Gold Standard's support for forestry projects, and A/R in particular, is critical to mitigating climate change.

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Comment Set #15

Name:

Barbara Haya

Organization:

Center for Environmental Public Policy,
University of California, Berkeley

Date of receipt:

6 September 2019

From: Barbara Haya <bhaya@berkeley.edu>
Sent: 6-Sep-19 01:20
To: Office of the Environment
Subject: attached comments on proposed offset programs
Attachments: TAB_Public_Comment_Form-Barbara Haya.docx

Dear ICAO,

Please find attached comments on the offset programs that have applied to ICAO.

Sincerely,
Barbara

Barbara Haya, PhD
Research Fellow
Center for Environmental Public Policy, and
California Institute for Energy and Environment
University of California, Berkeley
<https://gspp.berkeley.edu/directories/faculty/barbara-haya>
bhaya@berkeley.edu
202-306-0576-cell

TAB Public Comment Template Form

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Commenter Name: Barbara Haya

Commenter Organization: Center for Environmental Public Policy, University of California, Berkeley

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Clean Development Mechanism		Additionality (Section 3.1)	<p>The methods used to assess the additionality of projects under the CDM has failed to ensure that participating projects are additional. This has lead to the large majority of CDM projects being non-additional. Please see the following publications as evidence of these two assertions. For this reason the CDM does not meet the ICAO additionality eligibility criterion.</p> <p>Cames M, Harthan RO, Füssler J, Lazarus M, Lee CM, Erickson P, & Spalding-Fecher R (2016) <i>How additional is the Clean Development Mechanism?</i>, Oeko Institut, Berlin. https://ec.europa.eu/clima/sites/clima/files/ets/docs/clean_dev_mechanism_en.pdf</p> <p>Haya B (2010) <i>Carbon Offsetting: An Efficient Way to Reduce Emissions or to Avoid Reducing Emissions? An Investigation and Analysis of Offsetting Design and Practice in India and China.</i> (Doctoral dissertation) Energy & Resources Group, University of California, Berkeley. https://escholarship.org/content/qt7jk7v95t/qt7jk7v95t.pdf</p>

			<p>Haya B (2009) <i>Measuring emissions against an alternative future: fundamental flaws in the structure of the Kyoto Protocol's Clean Development Mechanism</i>, Energy & Resources Group Working Paper ERG09-01, Berkeley. https://gspp.berkeley.edu/assets/uploads/research/pdf/Haya-ER09-001-Measuring_emissions_against_an_alternative_future.pdf</p> <p>Haya B & Parekh P (2011) <i>Hydropower in the CDM: Examining Additionality and Criteria for Sustainability</i>, University of California, Berkeley. https://gspp.berkeley.edu/assets/uploads/research/pdf/Haya_Parekh-ER11-001-Hydropower_in_the_CDM.pdf</p> <p>He G & Morse R (2013) Addressing Carbon Offsetters' Paradox: Lessons from Chinese Wind CDM. <i>Energy Policy</i>, 63, 1051-1055. doi:10.1016/j.enpol.2013.09.021</p>
VCS Program		Additionality (Section 3.1)	To the extent that VCS applies project-by-project additionality testing similar to the CDM's additionality testing methods, the same comment as the above refers also to VCS. VCS methodologies that use project-by-project additionality testing should not be considered as meeting the additionality eligibility criterion.
REDD.plus & Forest Carbon Partnership Facility		Additionality (Section 3.1), Permanence (Section 3.5), and Leakage (Section 3.6)	<p>REDD in its various forms can generate revenues for forest preservation programs, but the resulting credits do not necessarily represent real emissions reductions. The risk of over-crediting is high for REDD due to the challenges with preventing and otherwise accounting for leakage, ensuring reductions are permanent, and ensuring credits represent real additional reductions.</p> <p>Due to the challenges of leakage, permanence and additionality, that are particular to land use projects like REDD, these two programs do not meet the permanence, leakage, and additionality provisions.</p> <p>Please see the following document for a full discussion of these risks and limitations. Though these comments respond specifically to California's proposed Tropical Forest Standard, the concerns raised apply to any jurisdictional and project-based REDD program.</p>

			https://www.arb.ca.gov/lists/com-attach/149-tfs2019-UjpXMFYuBDZSCwBf.pdf
All of the programs proposed		<p>Additionality (Section 3.1), Baseline (Section 3.2), and Perverse Incentives</p>	<p>I suggest that instead of approving entire offset programs, that ICAO selects specific protocols that have been shown to meet the requirements of additionality, conservative baselines, avoidance of perverse incentives, and avoidance of leakage though careful and periodic independent peer-reviewed analysis by disinterested parties as described in the following publication.</p> <p>The following working paper discusses the challenges with ensuring that the credits generated under an offset program that uses a standardized method for assessing project eligibility represent real additional emissions reductions. Programs using this offset program structure include the Climate Action Reserve, the American Carbon Registry, and some VCS protocols. Above I describe the challenges and limitations of project-by-project methods of assessing additionality used by the CDM and many VCS protocols. None of these programs regularly perform the types of analysis described in the following publication that are needed when designing, monitoring, and updating protocols to manage the risk of over-crediting and so should not be deemed acceptable as a program as a whole. It is more realistic to analysis the quality of individual protocols to have a better chance of identifying offset project types that meet CORSIA’s eligibility requirements.</p> <p>Haya B, Cullenward D, Strong AL, Grubert E, Heilmayr R, Sivas D, & Wara M (2019) <i>Managing Uncertainty in Carbon Offsets: Insights from California’s Standardized Approach</i>, Stanford Law School ENRLP Program Working Paper, Stanford, CA. https://law.stanford.edu/publications/managing-uncertainty-in-carbon-offsets-insights-from-californias-standardized-approach/</p>

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Comment Set #16

Name:

Jos Cozijnsen

Organization:

Consulting Attorney Emissions Trading

Date of receipt:

6 September 2019

From: Jos Cozijnsen | Emissierechten.nl <jc@emissierechten.nl>
Sent: 6-Sep-19 06:24
To: Office of the Environment
Subject: Comments on the responses to the call for applications that were submitted for assessment by the TAB - CORSIA
Attachments: TAB_Public_Comment_Cozijnsen.docx

Dear sit, mrs,

See attached my comments

regards

--

Jos Cozijnsen MMA
Consulting Attorney Emissions Trading
Emissierechten.nl
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Commenter Name: Jos Cozijnsen, LLM

Commenter Organization: Consulting Attorney Emissions Trading

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
2. British Columbia Offset Program, 3 China GHG Voluntary Emission Reduction Program. 9. My Climate, 11.REDD.plus, 13.The State Forests of the Republic of Poland,)		7.Eligibility Criterion: Are only counted once towards a mitigation obligation	None of these programmes have a measure to avoid double claiming! Cannot be used by CORSIA now. They do not require and demonstrate that the host country accounts for any offset units issued such that double claiming does not occur between the airline and the host
4. CDM		7.Eligibility Criterion: Are only counted once towards a mitigation obligation	Does CDM not: UNFCCC writes that CERs cannot be double used “Assembly Resolution A39-3 Paragraph 21 Decides that emissions units generated from mechanisms established under the are eligible for use in CORSIA, provided that they align with decisions by the Council, including on avoiding double counting Hence the CDM has NO provision of that. It is possible that reductions reached by CDM are ALSO used by Host country to reach NDC. So, CDM can never be used without correction measure.

		-Legal Nature of Units: The program should define and ensure the underlying attributes and property aspects of a unit,	-Art 12 of the Kyoto Protocol describes when CERs can be used: only to meet Kyoto targets and sustainable development, The KP does not allow the use of CERs for other systems outside the UNFCCC. So, ICAO can accept CERs, but CERs cannot be used by ICAO. That is why the CoP as Parties to use CERs for pre-2020 commitments.
5. Climate Action Reserve		7. Eligibility Criterion: Are only counted once towards a mitigation obligation	Not ready yet: "We will create a new section of the Reserve's website with links to clear guidance regarding the process for qualifying credits for CORSIA, including procurement of a Letter of Authorization from the project's host country. In addition, the registry software will be updated to clearly identify credits which have been qualified for use in CORSIA, as well as the status of any Letter of Authorization, and access to relevant documents." The new section needs to show the letters first before they meet CORSIA requirements.
6. FCPF		7. Eligibility Criterion: Are only counted once towards a mitigation	FCPF is not ready yet: "registry has policies and procedures in development to ensure no double-issuance, double-use, double-claiming and double-selling of ERs". First we need to see this

		obligation	
7.Global Carbon Trust		7.Eligibility Criterion: Are only counted once towards a mitigation obligation	Not ready yet:”Similarly, GCT will provide the instructions for transfer of ACRs 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). “
8. Gold Standard		7.Eligibility Criterion: Are only counted once towards a mitigation obligation	This is no good enough. The reductions happen in UNFCCC host countries. GS need to make arrangements with host countries; ”For addressing this issue under Paris Agreement, Gold Standard is willing to develop procedures and include them as Annex to our GHG Emissions Reductions & Sequestration Product Requirements in line with ‘Guidelines on Avoiding Double Counting for CORSIA’.”
9.myclimate		7.Eligibility Criterion: Are only counted once towards a mitigation obligation	Not ready yet: “In accordance with CORSIA’s requirements we would put up the necessary measures and procedures”
10. nori		7.Eligibility Criterion: Are only counted once towards a mitigation obligation	Good! This is a good measure to prevent double use for compliance:”When a country approves the export of real interest in a CRC or offset credit, they will have to add a balancing 1 tonne CO2e to their official national GHG inventory. Projects in a country that is unwilling to approve exports is unlikely to qualify to sell CRCs in the

			CORSIA Nori market”
11. REDD		7.Eligibility Criterion: Are only counted once towards a mitigation obligation	Good measure: Host country needs to probe avpiding:”This is potentially the most important differentiator of the UNFCCC REDD+ Mechanism when compared to project-based approaches/programmes.The UNFCCC process is governed by countries and that these emission reductions are governed by countries. The REDD.plus Registry has policies and systems to ensure that there is no double counting, double issuance and cast doubt over project-based standards that require country attestation letters to avoid double counting”
12.Thailand Greenhouse Gas Management Organization		7.Eligibility Criterion: Are only counted once towards a mitigation obligation	This looks promising and the rigt approach, so this programme can only be uses after Art 6 rules are ready:”The program is currently considering potential approaches which could be applied to avoid double-claiming between international mitigation objectives, with the understanding that this consideration is relevant and subject to the ongoing discussion under the UNFCCC process, in particular concerning Decision 1/CP.21, paragraph 36 on guidance on cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement, which is currently not conclusive. Upon the adoption of the aforementioned guidance (expected by the end of 2019), the program would assess and determine how double-

			claiming could be best avoided in its context.”
14. VCS Program (managed by Verra)		7. Eligibility Criterion: Are only counted once towards a mitigation obligation	Good measure: “a commitment to ensure that any potential double counting with any relevant NDC is addressed (e.g., via a corresponding adjustment)”. VCS needs to show that any credit that is cancelled for CORSIA is correspondingly adjusted. See also Paras 77 of Transparency Decision of CoP 24, indication that only ITMOs can be used outside UNFCCC, up to Parties to decide

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)