

CORSIA Eligible Emissions Unit Programme Change Notification Form

Version 2.0; Effective from 10 January 2022

PART A: ABOUT THIS FORM

Once an emissions unit programme is approved by the ICAO Council as eligible to supply CORSIA Eligible Emissions Units, the programme commits to notify the ICAO Secretariat of any “material changes” to its “Scope of Eligibility”, *including any unilateral decision to revoke or invalidate a class of CORSIA- eligible emission units within the programme’s Scope of Eligibility*, for further review¹ by the Technical Advisory Body (TAB) that advises the ICAO Council on the eligibility of emissions units for use in CORSIA.

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

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

Annually, TAB will indicate deadlines for programmes to notify ICAO of any such material changes. These notifications should be submitted by the next deadline after the material change has occurred; the upcoming deadlines are indicated in the version of the *TAB Work Programme and Timeline* document that is currently effective. This document is available on the CORSIA website³.

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

PART B: PROGRAM CHANGE NOTIFICATION(S)

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

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

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

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

Programme name: Forest Carbon Partnership Facility (FCPF)

CHANGE 1
a. Description of the change (e.g., the addition, modification, deletion undertaken): Modification of the Validation and Verification Guidelines (VVG)
b. Rationale for the change: To take into consideration remarks received by the ANSI Accreditation Body (ANAB) during a gap assessment they conducted on the VVG.
c. Where the change is reflected in the Programme’s documentation or other resource(s) ⁴ : The revised version of the VVG can be found at the following link: https://www.forestcarbonpartnership.org/sites/fcp/files/fcpf_validation_and_verification_guidelines_2021_ver_2.4.pdf
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility: There were no Validation and Verification Guidelines when the program originally submitted information. The TAB was informed of the implementation of VVGs to meet the validation and verification conditionality and Version 2.0 of the VVG was submitted to the TAB on 10 April 2020.
e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change: The main changes made between the version initially submitted to the TAB (2.0) and the most recent version (2.4) of the VVG are the following: a. References to different FCPF Guidelines and FCPF Guidance Notes were updated. b. Accreditation requirements were clarified to enable other Accreditation Bodies (beyond ANAB) to provide accreditation services under the FCPF; c. Requirements on VV team capabilities were clarified (i.e. auditors are required to undergo a mandatory training and exam on their knowledge of FCPF requirements, VV teams shall contain a local forest expert) d. The assessment of the Crediting Period Start Date against the definition of the FCPF Glossary of Terms was included as part of the validation objectives. e. Criteria for validation and verification were clarified. f. Additional guidance for the preparation of sampling plans by a Validation and Verification Body (VVB) were provided in annex.

CHANGE 2

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

a. Description of the change (e.g., the addition, modification, deletion undertaken):
Modification of the Buffer Guidelines
b. Rationale for the change:
To meet the conditionality relating to reversals, which is as follows: “The ICAO Council requests that Forest Carbon Partnership Facility complete the following actions before being reconsidered for CORSIA eligibility: to put in place procedures, including any additional governance arrangements, which will ensure monitoring for and compensation of material reversals for a period of time that at the very least exceeds the period of time between when the programmes were assessed (2019) and the end of the CORSIA’s implementation period (2037) for those implementing participants that wish to generate CORSIA Eligible Emissions Units and so commit to the implementation of these procedures.”
c. Where the change is reflected in the Programme’s documentation or other resource(s) ⁵ :
The revised version of the Buffer Guidelines is attached. There is also a resolution attached which details the World Bank’s role in review of monitoring and verification reports and reporting reversals to ICAO. Both this revised version of the Buffer Guidelines and the resolution will be made publicly available on the FCPF website in the next few days. Also attached in the “Response to CORSIA TAB” document is the World Bank’s commitment to carry out the reviews of monitoring and verification reports and to report reversals to ICAO.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:
Earlier versions of the Buffer Guidelines formed part of the information originally submitted to and assessed by the TAB. The original version did not include any specific conditionality for programs to meet CORSIA eligibility relating to reversals.
e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:
These revised Buffer Guidelines now include an additional section as follows: “13. CORSIA Eligibility If an ER Program wishes to supply “CORSIA Eligible Emissions Units” (as defined under CORSIA), the ER Program shall have in place a robust Reversal Management Mechanism that addresses the risk of Reversals beyond the Term of the CF ERPA and is equivalent to the ER Program CF Buffer. A Reversal Management Mechanism is considered to be equivalent to the ER Program CF Buffer if: a) It is a buffer; b) It covers potential reversals of the units generated under the ER Program during the Crediting Period; c) It allows the transfer of the Buffer ERs from the ER Program CF Buffer; d) The reversal risk set-aside percentage calculated under the Reversal Management Mechanism is equal to or higher than the actual reversal risk set-aside percentage of the ER Program CF Buffer; e) It has in place a periodic monitoring and third-party Verification mechanism for a period from the end of the Crediting Period to 31 December 2037 to confirm if there have been Reversals and makes monitoring and verification reports publicly available; and f) The Reversal Management Mechanism is operational and able to address identified Reversals.

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

The Reversal Management Mechanism shall be continually managed and operated by the ER Program Entity and allows the World Bank, in its capacity as trustee of funds made available from the FCPF for this purpose, to (i) carry out a desk review of the publicly available monitoring and verification reports of the ER Program for Reversals and (ii) inform CORSIA, and the CFPs if applicable, of any Reversals and related compensation (through replacement of the CORSIA Eligible Emissions Units) under the ER Program’s Reversal Management Mechanism, from the end of the Crediting Period through 31 December 2037.”

The Carbon Fund Participants have also requested the World Bank, in its capacity as trustee of funds to be made available by the CFPs from the FCPF, to carry out a desk review of the publicly available monitoring and verification reports of all ER Programs wishing to supply “CORSIA Eligible Emissions Units” (as defined under CORSIA) for Reversals for a period from the end of the Crediting Period of the respective ER Program through 31 December 2037. If there is a Reversal the World Bank will inform CORSIA, and the CFPs if applicable, of the Reversal and the related compensation (through replacement of the CORSIA Eligible Emissions Units) under the ER Program’s Reversal Management Mechanism.

The Carbon Fund Participants have also requested the World Bank to transfer US\$10.0 million from the FCPF to a World Bank Trust Fund, if necessary, to provide sufficient budget for World Bank staff to carry out the desk reviews and report to CORSIA and CFPs where necessary.

For clarification purposes please be informed that the FCPF Carbon Fund is scheduled to terminate on 31 December 2025. The World Bank, or International Bank for Reconstruction and Development (IBRD), the current Trustee of the FCPF Carbon Fund, commits to carry out a desk review of the publicly available monitoring and verification reports of all ER Programs wishing to supply “CORSIA Eligible Emissions Units” (as defined under CORSIA) for Reversals for a period from the end of the Crediting Period of the respective ER Program through 31 December 2037. If there is a Reversal the World Bank will inform CORSIA, and the CFPs if applicable, of the Reversal and the related compensation (through replacement of the CORSIA Eligible Emissions Units) under the ER Program’s Reversal Management Mechanism.

The World Bank will carry out these reviews using funds made available from the FCPF.