Technical Advisory Body (TAB)

Public comments received on
Applications and re-assessment in April 2022

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Comment Set

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Organization:

Conservation International (CI), Environmental Defense Fund (EDF) and the Nature Conservancy (TNC)

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From: Maggie Comstock <mcomstock@conservation.org>
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Subject: CI, EDF, TNC Joint ICAO Public Comments

Dear Technical Advisory Body members,

Conservation International (CI), Environment Defense Fund (EDF) and The Nature Conservancy (TNC) would like to thank you for the opportunity to submit our comments on the responses to the call for applications that were submitted for assessment by the TAB. Please find our joint inputs to the TAB public comment process attached. Thank you for your time and consideration.

Best,
Maggie

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PUBLIC COMMENT ON ICAO EMISSIONS UNIT PROGRAMME REVIEW – APRIL 2022

Note: These inputs to the Technical Advisory Body (TAB) public comment process were prepared jointly by Conservation International, Environmental Defense Fund and The Nature Conservancy.

Commenter Names:

- Maggie Comstock, Senior Director, Climate Policy & Carbon Markets, Conservation International, mcomstock@conservation.org
- Breanna Lujan, Senior Manager, Natural Climate Solutions, Environmental Defense Fund, blujan@edf.org
- Kelley Hamrick, Senior Policy Advisor, The Nature Conservancy, kelley.hamrick@tnc.org

Commenter Organizations: Conservation International, Environmental Defense Fund, The Nature Conservancy

Commenters' note: We have noticed through multiple cycles of assessments that there are inconsistent interpretations of how to fulfill the EUCs, particularly under governance. Additionally, it would be helpful for applications to have supplemental documents available in multiple languages, including English.

Table 1: New Responses to Call for Applications against CORSIA Emissions Unit Criteria

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
BioCarbon Fund Initiative for Sustainable	**Commenter overall summary**	The BioCarbon Fund Initiative for Sustainable Forest Landscapes (ISFL) programme seeks to include emissions reductions from additional types of Agriculture, Forest and Other Land Use (AFOLU) mitigation activities to complement the mostly forestry-related emissions projects covered under the World Bank's Forest Carbon Partnership Facility.	

Forest Landscapes		In 2020, our main concerns with this programme were around the length of programme governance, ensuring permanence of transacted credits, and transparency around the World Bank's Transaction Registry. These issues have been addressed, but the ISFL programme does not appear to meet CORSIA eligibility requirements related to double counting. For this reason, we believe that **ISFL credits should only be approved for pre-2021 vintages, until CATS develops stronger guidance to meet CORSIA's requirements related to avoiding double claiming.**	
	Question 3.7	Programme governance	**The ISFL has implemented new options** in governance; for emissions reductions programs that want to become CORSIA-eligible, the World Bank "will continue to monitor ISFL ER Programs through 31 December 2045 in relation to the Reversal Management Mechanism." **This meets the EUC requirement.**
	Question 4.1	Are additional	Additionality is met through the use of a conservative baseline represented as an average of annual historical GHG emissions and removals of activities in the programme jurisdictions over a baseline period of 10 years. **Hence, additionality is demonstrated in terms of the excess GHG reductions or removals relative to a conservative emissions baseline.**
	Question 4.3	Are quantified, monitored, reported and verified	**The ISFL will use the World Bank's Carbon Asset Tracking System (CATS) for a registry; this meets the EUC requirements.**
	Question 4.5	Represent permanent emissions reductions	The ISFL employs a buffer system (i.e., reserves of reductions which are not transferred but which can be accessed to compensate for any reversals) which ranges from 10-40% depending on Participant risk. **Additionally, ISFL now provides a clearer plan to ensure monitoring of reversals through 2045 through the establishment of new requirements for participating "Program Entities"** to explain how verification will remain in place through 2045 and establish a Reversal Management Mechanism. **This meets the EUC requirements.**

	Question 4.6	Assess and mitigate against potential increase in emissions elsewhere	**ISFL requires that implementing entities consider mitigating leakage risk and that a displacement strategy must be implemented before verification.** However, it does not require programs to deduct leakage from their crediting. Instead, ISFL recognizes that "leakage from jurisdictional programs is not feasible to monitor in practice" and instead requires that "leakage mitigation measures should be mandatorily considered in the program design (Section 3.2.5); and are subject to assessment as part of verification to ensure the program design and intervention measures minimize the risk of leakage".
	Question 4.7	Are only counted once towards a mitigation obligation	The ISFL response does not provide many details about measures taken to prevent double claiming within the submission; instead, ISFL references the World Bank's Carbon Assets Tracking System Terms and Conditions. However, these Terms don't provide much guidance either, beyond banning double-claiming and requiring that, in the event of double-claiming, the user shall notify CATS and the credits will be taken out of a buffer. This does not address all the CORSIA EUC sub-questions, including: 1. Ensuring no double claiming occurs where "emissions units are created where mitigation is not also counted toward national target(s) pledge(s) / mitigation contributions / mitigation commitments" 2. Ensuring there are procedures in place check whether there are "double claimed mitigation associated with units used under the CORSIA which the host country's national accounting focal point or designee otherwise attested to its intention to not double claim" Instead, it appears that CATS expects countries to self-report this, but it doesn't necessarily have plans in case countries do not self-report double claiming. **As such, the programme does not appear to meet CORSIA eligibility requirements related to double counting**. **ISFL credits should only be approved for pre-2021 vintages, until CATS develops stronger guidance around avoiding double claiming.**

[BioCarbon Registry](#)	**Commenter overall summary**	**BioCarbon Registry (BCR) formerly required the inclusion of a host country attestation to ensure that units are only counted once toward Proclima, and it complies with some of the programme design elements. In addition to reinstating the requirement for host country attestation, other measures needed to ensure EUC compliance include more details on clarifying the methodologies approved and meeting insurance policy requirements.**	
	Question 3.1	Clear methodologies and protocols	**BCR develops its own methodologies but also approves the methodologies of other standards wholesale (e.g., CDM).** It´s not clear whether the program applicant has oversight over those methodologies under other standards, and therefore it would not meet the EUC criteria.
	Question 3.7	Programme governance	**BCR does not have an up-to-date professional liability insurance policy of at least USD $5M,** despite this being an EUC requirement. Although the application states BCR is open to developing this insurance policy, **it would currently not meet the EUC requirements.**
	Question 4.1	Are additional	**Additionality requirements vary by specific methodology** and there is no positive list of activities that are automatically considered as "additional." The procedures and tools to demonstrate additionality are structured using with the CDM Tool as a basis and additionality is assessed through an independent third-party verification entity. **BCR appears to meet this EUC requirements.**
	Question 4.3	Are quantified, monitored, reported and verified	**BCR appears to meet the EUC requirements** as it includes processes to ensure that an accredited independent third-party entity measures and verifies the mitigation and it relies on the use of conservative approaches.
	Question 4.5	Represent permanent emissions reductions	There is no minimal threshold for a risk of reversals, but for AFOLU projects, there is a 15% discount of total VVCs issued available for compensation of material reversals. **BCR commits to ensuring full compensation of any reversals and it appears to meet the EUC requirements.**

	Question 4.7	Are only counted once towards a mitigation obligation	Overall, BCR appears to have some procedures in place to guarantee that credits are only counted once towards a mitigation outcome. However, there seems to be a misinterpretation around the requirement to obtain a host country attestation to ensure no double claiming of credits. BCR does state they are willing to consider introducing new processes; however, without this step, post-2020 vintages are ineligible under CORSIA. **Therefore, additional steps are needed to establish the requirement for host country attestation in BCR's application to meet the requirements of this EUC for post-2020 units.**
	Question 4.8	Do no net harm	**The programme has safeguards specific to each type of activity and appears to comply with the EUC requirements.** For REDD+, there is a separate safeguards system that must be used. According to the application, the BCR standard sets out requirements for the analyses of the future socioeconomic impacts and other more specific to the activity type.
[Cercarbono]()	**Commenter overall summary**	Overall, the Cercarbono programme meets some of the programme design elements for the CORSIA EUCs, such as those for baselines, double counting and double claiming. **However, further clarity is required around what additional standards Cercarbono applies to the list of CDM-approved methodologies that it proposes for use, if any, and on ensuring additionality; social and environmental safeguards should also be applied for all sectors.** Furthermore, the application contains conflicting information on whether agriculture, forestry, and other land use-related activities are to be included in the Cercarbono programme. Along with clarifying provisions around additional standards for methodologies, clarifying the provisions on ensuring additionality, and applying safeguards to all sectors, our recommendation is that all relevant forestry-related methodologies should be included as eligible activities within Cercarbono, as well as a buffer system to address their permanence risks.	
	Question 4.1	Are additional	**The application appears to comply with the EUC requirements as it mentions that additionality is ensured through the application of certain Cercarbono approved methodologies, recognition of CDM methodologies and Cercarbono's additionality tool to Demonstrate Additionality of Climate Change Mitigation**

			Initiatives, which is mandatory to all projects. The validation and verification bodies also assess conformity. Additionally, Cercarbono allows the use of CDM additionality guidelines and tools for additionality demonstration. This approach is expected to be excluded in the next version of the protocol.
	Question 4.2	Are based on a realistic and credible baseline	According to the application, the baseline scenario must be robust, credible, documented, repeatable and determined in an appropriate manner, considering the designed operating conditions and activity levels. At the same time, the validation and verification body performs the assessment ensuring that the units are issued against realistic, conservative baseline estimates of emissions, based on ISO 14064-3. This programme has measures in place to ensure that all units are based on a conservative baseline. **Cercarbono's application is compliant with the EUC regarding baselines, since it assures it relies on conservative baselines that are verified and the criteria for these assessments by the validation bodies are set in the Programme's Protocol.**
	Question 4.5	Represent permanent emissions reductions	According to the application, Cercarbono claims that the land use sector presents a potential risk of reversals, including "GHG removal through afforestation, reforestation and restoration of woody crops, mangroves, wetlands and other lands" Cercarbono has therefore decided to exclude these activities from the CORSIA application, even though such risk can be mitigated by creating a system to address risk of reversals. Mitigation outcomes from all sectors are vulnerable to risks of "reversals" – the resumption of emissions after a period of reduced or stopped emissions– these can include political risks, project management risks, financial risks, market risks, as well as risks from both human actions and impacts beyond human control (e.g., natural disturbances). However, there is more than a decade of experience and best practice for managing these risks. One approach for addressing the risk of reversals is the use of a "buffer" system.

			Cercarbono has some procedures and measures in place to mitigate the risk of reversals and to compensate for them should they occur. However, the buffer pool, as well as the protocols for project proponents to communicate and address reversals, are under development**, once this system is in place, Cercarbono would appear to meet the EUC requirements. Additionally, we believe that Cercarbono should include all relevant land sector methodologies as eligible activities.**
	Question 4.7	Are only counted once towards a mitigation obligation	**The programme requests host countries to issue a statement authorizing the use of carbon credits under a certain offset scheme and to declare that these emissions reductions will not be claimed by the government to meet its own mitigation targets.** Furthermore, Cercarbono's application states that there is a defined process for the activity proponent to compensate units for which there has been a double claim. **The application appears to meet the EUC requirements.**
	Question 4.8	Do no net harm	According to the application, "Currently, the safeguards system applies only to REDD+ projects." **Both environmental and social safeguards should be required for all sectors, therefore the application does not seem to comply with the EUC requirements in its current formulation.** Furthermore, the application is unclear as to whether there is a National Safeguards System in place and how/if the programme would comply with it. Cercarbono also provides a voluntary tool for reporting and monitoring contribution to Sustainable Development Goals.
International Carbon Registry	**Commenter overall summary**	It is unclear whether the International Carbon Registry (ICR) is a registry or a programme. The ICR plans to use methodologies and projects already developed under the Clean Development Mechanism (CDM), Verified Carbon Standard (VCS), and the American Carbon Registry. **As with previous applications, we are concerned about the level of control ICR will have over many of the offset integrity criteria and programme design elements for these methodologies. Furthermore, ICR will have no control over how those programmes evolve; this does not seem to meet the requirements for CORSIA EUCs.**	

	Question 3.1.	Clear methodologies and protocols	The International Carbon Registry seems to allow all CDM, VCS and ACR methodologies; **as they do not appear to exercise any additional screening or due diligence over these approaches**, the Registry does not appear to have any control over these development processes. Separately, the Registry plans to develop its own methodologies; however, as none have been developed to date, it is not possible to examine these methodologies for quality across the EUC requirements. **We do not think this meets the EUC criteria.**
	Question 3.3	Offset credit issuance and retirement procedures	It is unclear how credits from existing programs (such as CDM or VCS) are cancelled and re-issued here; **nothing in this section mentions potential cancellation**. ICR should further explain how this works. **Unless cancellation is required, this approach does not meet the EUC.**
	Question 3.4	Identification and tracking	Of concern is ICR's note that it **has licensed the registry technology for ten years**; as CORSIA runs through 2037, the registry should be in place at least until then. **Until this license is extended through 2037, ICR does not meet the EUC.**
	Question 3.7	Programme governance	**ICR does not meet the EUCs here as it does not meet the two-year governance requirements, has no long-term governance plans, and has no liability insurance.**
	Question 3.9	Safeguards system	ICR's safeguards **only required that projects "shall identify and address" issues**; **this statement alone does not seem to meet the EUC requirements**.
	Question 3.10	Sustainable development criteria	ICR bases its sustainable development criteria on the "on reference standards that sets out the principles and criteria for sustainable development, such as the World Business Council for Sustainable Development (WBCSD) and the ISO 14060 family of standards." **We do not consider this approach sufficiently robust.**
	Question 4.1	Are additional	**It is unclear if ICR has created its own additionality criteria**, building off the CDM and other principles, or if it simply accepts additionality criteria in methodologies from the CDM, VCS, etc. **If it is the latter, it should not qualify**; though CDM is eligible for CORSIA, this process was not transparent (CDM only submitted a letter, not an application) and civil society was not able to provide comments around

			specific CDM EUCs. There are many reports that have assessed the additionality of CDM projects as not up to par.
	Question 4.2	Are based on a realistic and credible baseline	Again, **it is unclear whether ICR has its own baseline requirements or simply accepts those from other programmes**. The latter is not within ICR's own governance and should not be allowed. If ICR does not have its own baseline requirements, it does not meet the EUC.
	Question 4.5	Represent permanent emissions reductions	Again, **it is unclear whether ICR has its own baseline requirements or simply accepts those from other programmes**. The latter is not within ICR's own governance and should not be allowed. If ICR does not have its own baseline requirements, it does not meet the EUC. Additionally, the buffer does not currently differentiate CORSIA-eligible credits from non-CORSIA eligible credits; if accepted, ICR must enforce this.
	Question 4.6	Assess and mitigate against potential increase in emissions elsewhere	Again, **it is unclear whether ICR has its own baseline requirements or simply accepts those from other programmes**. The latter is not within ICR's own governance and should not be allowed. If ICR does not have its own baseline requirements, it does not meet the EUC.
	Question 4.7	Are only counted once towards a mitigation obligation	ICR **does not address how to reconcile a situation where a country does not apply a corresponding adjustment as promised for the units used toward CORSIA obligations**. This is an important consideration for avoiding double claiming of units and must be addressed by all standards that wish to "unlock" post-2020 vintages for use under CORSIA. As it stands, ICR's approach does not meet the EUC.
	Question 4.8	Do no net harm	**Greater specificity is needed on how ICR will ensure and enforce the EUC of "do no net harm."** The current response is insufficient and does not meet the EUC.

J-Credit Scheme	**Commenter overall summary**	The J-Credit Scheme, which is administered by the central government of Japan, is designed to certify the amount of greenhouse gas emissions reduced and removed by sinks within Japan. Under the J-Credit Scheme, the amount of greenhouse gas emissions (such as CO_2) reduced or removed by sinks through efforts to introduce energy-saving devices and manage forests is certified as "credit." Note that all documents linked to in the application form are in Japanese, so we were unable to review and assess compliance with the EUCs. However, based on the information presented in the application, **the J-Credit Scheme does not seem to have mechanisms in place to comply with key EUCs**, including those on program governance, transparency, double counting, leakage, and permanence.	
	Question 3.3	Offset credit issuance and retirement procedures	The EUCs state that programs should have in place procedures for how offset credits are: (a) issued; (b) retired or cancelled; (c) subject to any discounting; and (d) the length of the crediting period and whether that period is renewable. The application states that there is no need for a discount procedure as the methodologies require conservative emission reduction/removal calculations, **however, it does not explain how this will ensure that issuance and retirement occur when applicable. Based on the information provided, the programme does not appear to meet this EUC.**
	Question 3.7	Programme governance	It is unclear whether the "opinion of a Steering Committee," which recommends that the Scheme has the authority to change rules and procedures for implementing the Scheme, **has been codified in the J-Credit Scheme procedures.** Although the application states that the Scheme plans to continue operating in and after FY2030, it does not specify whether this will go through 31 December 2037. **Based on the information provided, the programme does not appear to meet this EUC.**
	Question 3.8	Transparency and public participation provisions	As noted above, all documents and sites linked to in the application are in Japanese, making it difficult to access and therefore assess compliance with the EUCs. **We recommend that the materials are translated and made publicly available.**

	Question 3.9	Safeguards system	As noted above, all documents and sites linked to in the application are in Japanese, making it difficult to access and therefore assess compliance with the EUCs. Additionally, it seems as if only the rules for developing methodologies are subject to compliance with social and environmental safeguards. However, **there don't appear to be any mechanisms in place to ensure that projects and programs within the J-Crediting Scheme also comply with safeguards. Based on the information provided, the programme does not appear to meet this EUC.**
	Question 3.10	Sustainable development criteria	The mechanisms in place **do not disclose which sustainable development criteria are used**; rather, they primarily focus on determining whether any laws or regulations were violated. **Based on the information provided, the programme does not appear to meet this EUC.**
	Question 3.11	Avoidance of double counting, issuance and claiming	As noted above, all documents and sites linked to in the application are in Japanese, making it difficult to access and therefore assess compliance with the EUCs. Additionally, the application states that because this program is operated by the central government, "measures can be taken to ensure that environmental value is not claimed twice along with Japanese emissions." This seems to imply that the only double counting being monitored is "environmental value" along with "emissions," rather than double counting, issuance, and claiming of emissions. Furthermore, **it is unclear what measures the central government will take to prevent this from happening. Based on the information provided, the programme does not appear to meet this EUC.**
	Question 4.1	Are additional	As noted above, all documents and sites linked to in the application are in Japanese, making it difficult to access and therefore assess compliance with the EUCs. The material in the application **does not explain how the concepts of additionality and baseline setting, which are incorporated into the J-Credit Scheme, ensure that offsets are additional**. Additionally, **it is unclear who the "examining authority" is and what methodology and stringency they are using to assess additionality and baseline setting.**

			Furthermore, under the Scheme, "Additionality does not need to be proven (positive list) in individual projects for Methodologies with a high probability of additionality (economic barriers and general practical barriers)" where a high probability "is determined based on whether or not it is at least 95% reliable that a project subject to a Methodology has additionality." **But it is not clear what "subject to a methodology" means. Based on the information provided, the programme does not appear to meet this EUC.**
	Question 4.2	Are based on a realistic and credible baseline	As noted above, all documents and sites linked to in the application are in Japanese, making it difficult to access and therefore assess compliance with the EUCs. In any, case the application states that "Under the J-Credit Scheme, conservativeness in the Implementation Outline: requires that the Scheme documents specify procedures to ensure that emission reductions/removals are not overestimated." **It is not clear whether there are already procedures in place to ensure that emissions reductions are not overestimated, and how rigorous those procedures are. Based on the information provided, the programme does not appear to meet this EUC.**
	Question 4.3	Are quantified, monitored, reported and verified	As noted above, all documents and sites linked to in the application are in Japanese, making it difficult to access and therefore assess compliance with the EUCs. **Based on the information provided, the programme does not appear to meet this EUC.**
	Question 4.5	Represent permanent emissions reductions	The **applicant responded "not applicable" to all questions related to permanence but does not explain why.** If the assumption is that no projects or programs under the Scheme run the risk of not representing permanent emissions reductions, it would be helpful to explain this. **Based on the information provided, the programme does not appear to meet this EUC.**
	Question 4.6	Assess and mitigate against potential	The applicant states that because emissions attributed to a project, whether inside or outside the project boundaries, need to **be tracked, mitigating leakage is not applicable. However, this does not take into account emissions not attributed to a project, or how far emissions monitoring beyond a project boundary will extend.**

		increase in emissions elsewhere	**There are also no mechanisms to mitigate leakage should it occur. Based on the information provided, the programme does not appear to meet this EUC.**
	Question 4.7	Are only counted once towards a mitigation obligation	Although the applicant states that double counting is not possible because there are no transfers between registries of other schemes, should double certification occur, "Management may demand that the project participant cancel the same quantity of J-Credits within 40 business days." **However, management *must* require that the appropriate quantity of credits be canceled in order to prevent double counting.** Additionally, the application states that because the government operates a Registry System, "it can be confirmed that credits intended to be used in the CORSIA will not be double claimed," **but it does not explain how or why. Based on the information provided, the programme does not appear to meet this EUC.**
Joint Crediting Mechanism (JCM) between Japan and Mongolia	**Commenter overall summary**	Japan's Joint Crediting Mechanism (JCM) is a unique greenhouse gas programme in that the methodologies are adjusted for each bilateral deal between Japan and a partner country. As stated in their application, "JCM rules and guidelines discussed between Japan and Mongolia are adopted reflecting national circumstances, rules and regulations of Mongolia". As was the case in its 2020 submission, the JCM put forward its bilateral programme with Mongolia focusing on three methodologies, (1) Installation of Solar PV Systems, (2) Replacement and Installation of High Efficiency Heat Only Boiler for Hot Water Supply Systems, and (3) Installation of Energy-saving Transmission Lines in the Mongolian Grid. **Based on their application, the three proposed methodologies meet the majority of the EUCs, though some of the clarifications between submissions were not clear (e.g., the requirements related to conflict resolution).** **Based on the JCM application for the programme between Japan and Mongolia, we have concerns whether all the EUCs were fully satisfied, despite some recent progress.** However, the JCM is a credible programme with nearly a decade of experience. We note that it would be appropriate for other	

		bilateral JCM programmes to be put forward in the future for TAB consideration, including, for example, programmes utilizing the JCM REDD+ methodology, provided that the EUCs are fully met.	
	Question 4.7	Are only counted once towards a mitigation obligation	Regarding **double counting**, the application makes progress in that it requires the Mongolian side to "provide written attestation to avoid double counting for the use of JCM credits towards international mitigation purposes as necessary, which is made publicly available" and corresponding adjustments in line with the Paris Agreement, which were not explicitly mentioned in the 2020 application. It also notes that the provisions will be further elaborated in line with Article 6.2 guidance. **Based on the information provided, the programme appears to meet this EUC.**
SOCIAL-CARBON Standard	**Commenter overall summary**	**Based on SOCIALCARBON's submission, the standard meets the majority of the EUC requirements. The following consideration would determine whether we would fully support the standard's inclusion in CORSIA:** • Whether SOCIALCARBON requires all methodologies from outside standards (e.g., CDM) to go through additional scrutiny, such as through its streamlined methodology approval process (the written submission differed at places on whether this was required or not; clarity is needed here). **Additionally, there were several sections where it was unclear whether SOCIALCARBON met the EUC requirements because the standard proposed a new approach that the EUC guidance did not fully address.** This includes: • Whether SOCIALCARBON meets the 2-year governance requirements, given that the standard has been active for more than 15 years for co-benefits certification, but has been active for less than two years as a carbon crediting agency. • Whether SOCIALCARBON's approach to permanence (and retiring all buffer contributions automatically) meets the EUCs around permanence and leakage. Finally, SOCIALCARBON's proposed approach for ensuring no double claiming does not fully consider how to account for countries that promise but do not deliver on corresponding adjustment commitments, **we advise that SOCIALCARBON is only approved for pre-2021 vintages.**	

	Question 3.1	Clear methodologies and protocols	At the present, SOCIALCARBON has approved select CDM methodologies for use in the standard. **It is unclear whether these methodologies must go through SOCIALCARBON's streamlined methodology approval process; if so, we think it meets the EUCs**. **If not, SOCIALCARBON does not appear to have any control over these development processes and does not meet the EUC.**
	Question 3.2	Scope considerations	Our understanding is that SOCIALCARBON will require all methodologies from other standards to go through additional criteria, based on this statement: "We accept all AFOLU CDM Methodologies and small-scale CDM methodologies **that meet our additionality eligibility criteria." In the event of additional criteria, SOCIALCARBON's approach of including select CDM methodologies meets the EUCs.**
	Question 3.7	Programme governance	SOCIALCARBON has been operating for more than 15 years. However, the standard has only recently evolved to include mitigation activities. **It is unclear whether SOCIALCARBON meets the requirement for two years of governance.**
	Question 4.1	Are additional	**It is unclear if SOCIALCARBON has created its own additionality criteria**: in Question 3.2, SOCIALCARBON claims to have its own criteria to assess additionality, while in Question 4.1, it sounds like SOCIALCARBON merely accepts all CDM additionality approaches. **The TAB should clarify which process is correct.** **If SOCIALCARBON accepts CDM's additionality requirements without any additional requirements, it should not qualify**. Though CDM is eligible for CORSIA, this process was not transparent (CDM only submitted a letter, not an application) and civil society was not able to provide comments around specific CDM EUCs. There are many reports that have assessed the additionality of CDM projects as not up to par.
	Question 4.3	Are quantified, monitored, reported, and verified	SOCIALCARBON takes an approach that relies less on monitoring, reporting and verification through the project crediting period; instead, it allows project proponents to decide when it is "economically feasible" to report and verify emissions reductions. To address this alternative approach, SOCIALCARBON permanently cancels all buffer stock credits to reduce the risk of reversals. **This is an unusual**

		approach; it appears to meet the EUCs, but further guidance from the TAB would be welcome here.
Question 4.5	Represent permanent emissions reductions	SOCIALCARBON requires projects **to complete non-permanence risk tools and reports and requires reporting of reversals of 5% or more.** Additionally, all buffer pool credits are cancelled automatically. **This appears to meet the EUCs.**
Question 4.6	Assess and mitigate against potential increase in emissions elsewhere	SOCIALCARBON has developed a nesting REDD+ guidance document to address the risk of leakage from REDD+ projects. **If fully nested, this appears to meet the EUCs.**
Question 4.7	Are only counted once towards a mitigation obligation	SOCIALCARBON has guidance around corresponding adjustments; however, this guidance only requires written attestation when mandated by the host country. For example, SOCIALCARBON says, "At present, procedures are not in place to compare countries' accounting for emission units, however if this becomes mandatory, we shall make provisions to comply." Additionally, there is no guidance around what happens if a country does not fulfill its promise to make a corresponding adjustment, stating, "project developers will not be responsible for reconciling double claimed mitigations if the host country fails to adjust their NDC." This is insufficient; for CORSIA, regardless of whether a host country wants to mandate the use of corresponding adjustments or not, there must be a corresponding adjustment to meet the CORSIA EUC. **Thus, credits from SOCIALCARBON should only be allowed for pre-2021 vintages, until these criteria are updated.**

* Please refer to Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs

Table 2: Material Changes to Standards Previously Assessed against CORSIA Emissions Unit Criteria

<table>
<tr><th>Programme Name</th><th>Reference in Programme Application Form</th><th>Emissions Unit Criteria reference*</th><th>Comment</th></tr>
<tr><td rowspan="3">Forest Carbon Partnership Facility (FCPF)</td><td>Commenter overall summary</td><td colspan="2">The Forest Carbon Partnership Facility (FCPF) has submitted a “material change” to “its scope of eligibility” for further review by the TAB. The changes pertain to the modification of the validation and verification guidelines (VVG) and the buffer guidelines. In 2020, the primary concern was around who would oversee the long-term governance and Reversal Management Mechanism of ER programmes during the post-Carbon Fund ERPA period, and how. Based on the material updates submitted, the FCPF has sufficiently addressed the gaps previously identified by the TAB. However, it would be helpful to have more details about how these procedures will work in practice (e.g., will there be a fixed team of World Bank staff dedicated to managing and operating the Reversal Management Mechanism, how long after Reversals are detected will the World Bank staff inform CORSIA and the CFPs, etc.).</td></tr>
<tr><td>Change 1</td><td>Validation and Verification Procedures I</td><td>When the FCPF originally submitted information, there were no Validation and Verification Guidelines. To address this gap, the FCPF submitted Version 2.0 of the VVGs in 2020, and subsequently updated the VVGs in the most recent version (2.4), which provide a set of requirements to ensure that the Validation and Verification criteria of the Forest Carbon Partnership Facility Carbon Fund (FCPF CF) are fulfilled.

As the VVGs clarify the accreditation requirements for Accreditation Bodies (beyond ANAB) to provide accreditation services under the FCPF, the requirements of VV team capabilities, principles applicable to VVBs, and the criteria, objectives, and process for validation and verification, this material update satisfactorily meets the EUCs.</td></tr>
<tr><td>Change 2</td><td>Permanence</td><td>Previously, the FCPF did not have a process in place to effectively oversee the long-term governance and Reversal Management Mechanism of ER programmes through 31 December 2037. To address this, the FCPF has revised the Buffer Guidelines to ensure that the Reversal Management Mechanism has in place a periodic monitoring and third-party Verification mechanism for a period from the end of the Crediting</td></tr>
</table>

			Period to 31 December 2037 to confirm if there have been Reversals and makes monitoring and verification reports publicly available, and that it is operational and able to address identified Reversals. Additionally, the FCPF has transferred US$10.0 million from the FCPF to a World Bank Trust Fund to provide sufficient budget for World Bank staff to continually manage and operate the Reversal Management Mechanism through: (1) carrying out a desk review of the publicly available monitoring and verification reports of all ER Programs wishing to supply “CORSIA Eligible Emissions Units” for Reversals, and (2) informing 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. Although the FCPF Carbon Fund is scheduled to terminate on 31 December 2025, the World Bank commits to fulfill the above functions through 31 December 2037. **Therefore, this update meets the EUCs.**

* Please refer to Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs