

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

**Re-application Form for Emissions Unit Programmes
seeking eligibility to supply units to
the CORSA first phase (2024 – 2026 compliance period)**

(Version 1, February 2023)

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SECTION I: ABOUT THE ASSESSMENT OF RE-APPLICATIONS

Background

ICAO Member States and the aviation industry are implementing the Carbon Offsetting and Reduction Scheme for International Aviation (CORSA). Together with other mitigation measures, CORSA will help achieve international aviation's aspirational goal of carbon neutral growth from the year 2020.

Aeroplane operators will meet their offsetting requirements under CORSA by purchasing and cancelling CORSA eligible emissions units. The ICAO Council determines CORSA eligible emissions units upon recommendations by its Technical Advisory Body (TAB) and consistent with the CORSA Emissions Unit Eligibility Criteria (EUC).

In March 2019, the ICAO Council unanimously approved the ICAO Document *CORSA Emissions Unit Eligibility Criteria* for use by TAB in undertaking its tasks¹. TAB's assessment of emissions units programmes is undertaken annually². The results of ICAO Council decisions that take account of these recommendations are contained in the ICAO Document *CORSA Eligible Emissions Units*³.

ICAO invites emissions unit programmes⁴ to apply for the 2023 cycle of assessment by the TAB, to determine eligibility to supply CORSA-Eligible Emissions Unit for the **2024-2026 compliance period** (first phase). Any programme that submitted its application(s) in previous assessment cycles and would like to re-apply for TAB assessment must fill out this Re-application form.

The assessment process involves collecting information from each programme through this programme Re-application form and supplementary materials and requested evidence. In undertaking this work, TAB may also ask programmes to provide specific examples or case studies illustrating how programme procedures or systems perform in practice. Through this assessment, the TAB will develop recommendations on the list of eligible emissions unit programmes (and potentially activity types and unit dates) for use under the CORSA first phase, which will then be considered by the ICAO Council.

This form is accompanied by, and refers to, Appendix A "*Supplementary Information for Assessment of Emissions Unit Programmes*", containing the EUC and *Guidelines for Criteria Interpretation*. These EUC and Guidelines are

¹ Available on the ICAO CORSA website: <https://www.icao.int/environmental-protection/CORSA/Pages/CORSA-Emissions-Units.aspx>

² Recommendations from 2019 TAB assessment cycle: <https://www.icao.int/environmental-protection/CORSA/Pages/TAB2019.aspx>

Recommendations from 2020 TAB assessment cycle: <https://www.icao.int/environmental-protection/CORSA/Pages/TAB2020.aspx>

Recommendations from 2021 assessment cycle: <https://www.icao.int/environmental-protection/CORSA/Pages/TAB2021.aspx>

Recommendations from 2022 assessment cycle: <https://www.icao.int/environmental-protection/CORSA/Pages/TAB.aspx>

³ Available on the ICAO CORSA website: <https://www.icao.int/environmental-protection/CORSA/Pages/CORSA-Emissions-Units.aspx>

⁴ "Emissions Unit Programme", for the purposes of TAB's assessment, refers to an organization that administers standards and procedures for developing activities that generate offsets, and for verifying and "issuing" offsets created by those activities. For more information, please review the TAB FAQs on the ICAO CORSA website: <https://www.icao.int/environmental-protection/CORSA/Pages/TAB.aspx>

provided to inform programmes' completion of this Re-application form, in which they are cross-referenced by paragraph number.⁵

This form is also accompanied by Appendix B “*Programme Assessment Scope*”, and Appendix C “*Programme Exclusions Scope*”, which request all re-applicants to identify the programme elements⁶ they wish to submit for, or exclude from, TAB’s assessment.

CORSIA Eligible Emissions Units Programmes must also complete Appendix D of this Re-application form, “*Emissions Unit Programme Registry Attestation*” in line with the instructions contained that Appendix. Applicant organizations are strongly encouraged to submit this information by the deadline for submitting all other application materials for the current assessment cycle.

This form also requests *evidence of programme procedures or programme elements*. These evidentiary documents enable TAB to a) confirm that a given procedure or program element is *in place*, b) more fully comprehend the programme’s summary responses, and c) archive the information as a reference for potential future assessments. Programme responses to this Re-application form will serve as the primary basis for the assessment. Such assessment may involve e.g. clarification questions, live interview(s) with TAB, and a completeness check of the application, as further requested.

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

Disclaimer: The information contained in the Re-application form, and any supporting evidence or clarification provided by the programme including information designated as “business confidential” by the programme, will be provided to the members of the TAB to properly assess the programme and make recommendations to the ICAO Council. The application and such other evidence or clarification will be made publicly available on the ICAO CORSIA website for the public to provide comments, except for information which the applicant designates as “business confidential”. The applicant shall bear all expenses related to the collection of information for the preparation of the application, preparation and submission of the application to the ICAO Secretariat and provision of any subsequent clarification sought by the Secretariat and/or the members of the TAB. Under no circumstances shall ICAO be responsible for the reimbursement of such or any other expenses borne by the applicant in this regard, or any loss or damages that the applicant may incur in relation to the assessment and outcome of this process.

⁵ For further information on how TAB interprets the EUC in light of the *Guidelines*, refer to the document Clarifications of TAB’s Criteria Interpretations Contained in TAB Reports available on the ICAO TAB website:

https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB%202022/Clarifications_TABs_Criteria_Interpretations.pdf

⁶ At the “activity type” level (e.g., sector(s), sub-sector(s), and/or project “type(s)”)

SECTION II: INSTRUCTIONS

Submission and contacts

A programme is invited to complete and submit the Re-application form, including accompanying evidence and with required appendices, through the ICAO CORSIA website no later than close of business on **24 March 2023**. Within seven business days of receiving this form, the Secretariat will notify the programme that its form was received.

If the programme has questions regarding the completion of this form, please contact ICAO Secretariat via email: officeenv@icao.int. Programmes will be informed, in a timely manner, of clarifications provided by ICAO to any other programme.

Form basis and cross-references

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

Re-application Form completion

Any programme that submitted its application(s) in previous assessment cycles and would like to apply in 2023 for TAB assessment must fill out this Re-application form. (Programmes that have never applied for TAB assessment are invited to instead use the Application form, which is designed for first-time applicants.) The programme is expected to respond to all questions in this application form at the time of application submission. TAB cannot initiate its assessment in which this information is not provided in full as requested in this section. Failure to provide complete information may result in delays to the assessment process.

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

- 1) Written summary responses: The programme is encouraged to construct written summary responses in a manner that provides for general comprehension of the given programme procedure, independent of supporting evidence. TAB will confirm each response in the supplementary evidence provided by the programme. Please note that written summary responses should be provided in all cases—supporting evidence (described in *c*) below) should not be considered as an alternative to a complete summary response.
- 2) Supporting evidence: Most questions in this form request *evidence of programme procedures or programme elements*. Such evidence may be found in programme standards, requirements, or guidance documents; templates; programme website or registry contents; or in some cases, in specific methodologies. To help manage file size, the programme should limit supporting documentation to that which directly substantiates the programme's statements in this form.

Regarding such requests for evidence, programmes are expected to substantiate their responses in any of

these ways (**in order of preference**):

- a) web links to supporting documentation included along with the written summary response to each given question; with instructions for finding the relevant information within the linked source (i.e. identifying the specific text, paragraph(s), or section(s) where TAB can find evidence of the programme procedure(s) in question);
- b) copying/pasting information directly into this form (no character limits) along with the written summary response;
- c) attaching supporting documentation to this form at the time of submission, with instructions for finding the relevant information within the attached document(s);

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

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

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

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

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

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

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

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

and

(2) new information describing any and all procedural changes and updates that programmes introduced ***between the dates of*** (a) their previous application or approval by ICAO Council and (b) **24 March 2023**. Here, Programmes are requested to summarize and provide evidence of any and all changes, including those that were previously submitted for TAB’s review as potential material changes.

Scope of re-application

The programme may elect to submit for TAB assessment all, *or only a subset*, of the activities supported by the programme. The programme is requested to identify, in the following Appendices, the activities that it wishes to submit for, or exclude from, TAB's assessment.

For programmes already eligible to supply emission units for the pilot phase, the programme may elect to revise the scope of activities supported by the programme and assessed by TAB, as compared to its current scope of eligibility. In such a case, the programme is requested to clearly identify, in the following Appendices, the additional activities that it wishes to submit for, or exclude from, TAB's assessment.

In **Appendix B** "*Programme Assessment Scope*", the programme should clearly identify, at the "activity type" level (e.g., sector(s), sub-sector(s), and/or programme/project "type(s)"), elements that were included in the previous application and were previously assessed by TAB and if applicable, **currently eligible under the Scope of Eligibility**⁷, **and additional elements that the programme is submitting for TAB's assessment**; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements; which *are* described in this form.

In **Appendix C** "*Programme Exclusions Scope*", the programme should clearly identify, at the "activity type" level (e.g., sector(s), sub-sector(s), and/or programme/project "type(s)"), any elements that were excluded from TAB's previous assessments or are **currently outside of programme's Scope of Eligibility, and additional elements that the programme wishes to exclude from TAB's assessment**; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements.

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

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

Treatment of EUC-relevant programme procedures at the methodology level

Programmes that identify with the following explanations are encouraged to summarize and provide evidence of

⁷ As defined in the latest *ICAO Document "CORSA-Eligible Emissions Units"*, available via <https://www.icao.int/environmental-protection/CORSA/Pages/CORSA-Emissions-Units.aspx>

both their overarching *programme-level* procedure(s) and *methodology-level* procedure(s) wherever relevant: The CORSIA EUC and TAB assessments typically apply to *programme-level* procedures rather than to individual methodologies or projects. Most programmes' overarching guidance documents contain a mix of *general/guiding* requirements and *technical* ones. However, some programmes set out general requirements in overarching guidance documents, while reflecting key technical procedures in programme methodologies⁸. **Such methodologies may be relevant to TAB's assessment.** This could be the case where, e.g., the methodologies are developed directly by the programme (staff or contractors); the programme must refer to a methodology's requirements when describing its alignment with the EUC; the programme's general requirements alone are too high-level/non-specific for TAB to assess them as stand-alone procedures.

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

“Linked” certification schemes

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

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

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

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

Disclosure of programme application forms and public comments

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

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

⁸ Note that any applicant may use different terminology. For example, a programme may refer to a “methodology” as a protocol or framework.

SECTION III: RE-APPLICATION FORM

PART 1: General information

A. Programme Information

Programme name: BioCarbon Registry

Administering Organization⁹: BioCarbon Registry SAS

Official mailing address: Carrera 7 # 67-02 Office 303. Bogotá, Colombia

Telephone #: +57 3233059939

Official web address: www.biocarbonregistry.com

B. Programme Administrator Information

Full name and title: Angela Duque Villegas, CEO and General Director

Employer / Company (*if not programme*): NA

E-mail address: aduque@biocarbonregistry.com Telephone #: +57 (310) 572 7198

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

Full name and title: Stefanny Diaz Rodriguez, Program Director

Employer / Company (*if not Programme*): NA

E-mail address: sdiaz@biocarbonregistry.com Telephone #: +90 5519589209

D. Programme Senior Staff / Leadership (e.g., President / CEO, board members)

List the names and titles of programme's senior staff / leadership, including board members:

Executive Board Members

- Adriana Pachon Ruiz, Agricultural Engineer; Specialist in Financial Management
- Miguel Rodriguez, Biologist, MSc.; AFOLU and Biodiversity
- Roberto León Gómez, Civil Engineer, MSc. Environmental and Natural Resources Economics; Environmental Management and Sustainable Development

⁹ Name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme, *if different from "Programme Name"*.

Chief Executive Officer (CEO) and General Director

- Angela Duque Villegas, Forestry Engineer, Specialist in Social Assessment of Projects, MSc. Environmental and Natural Resources Economics; climate change expert

Program Director

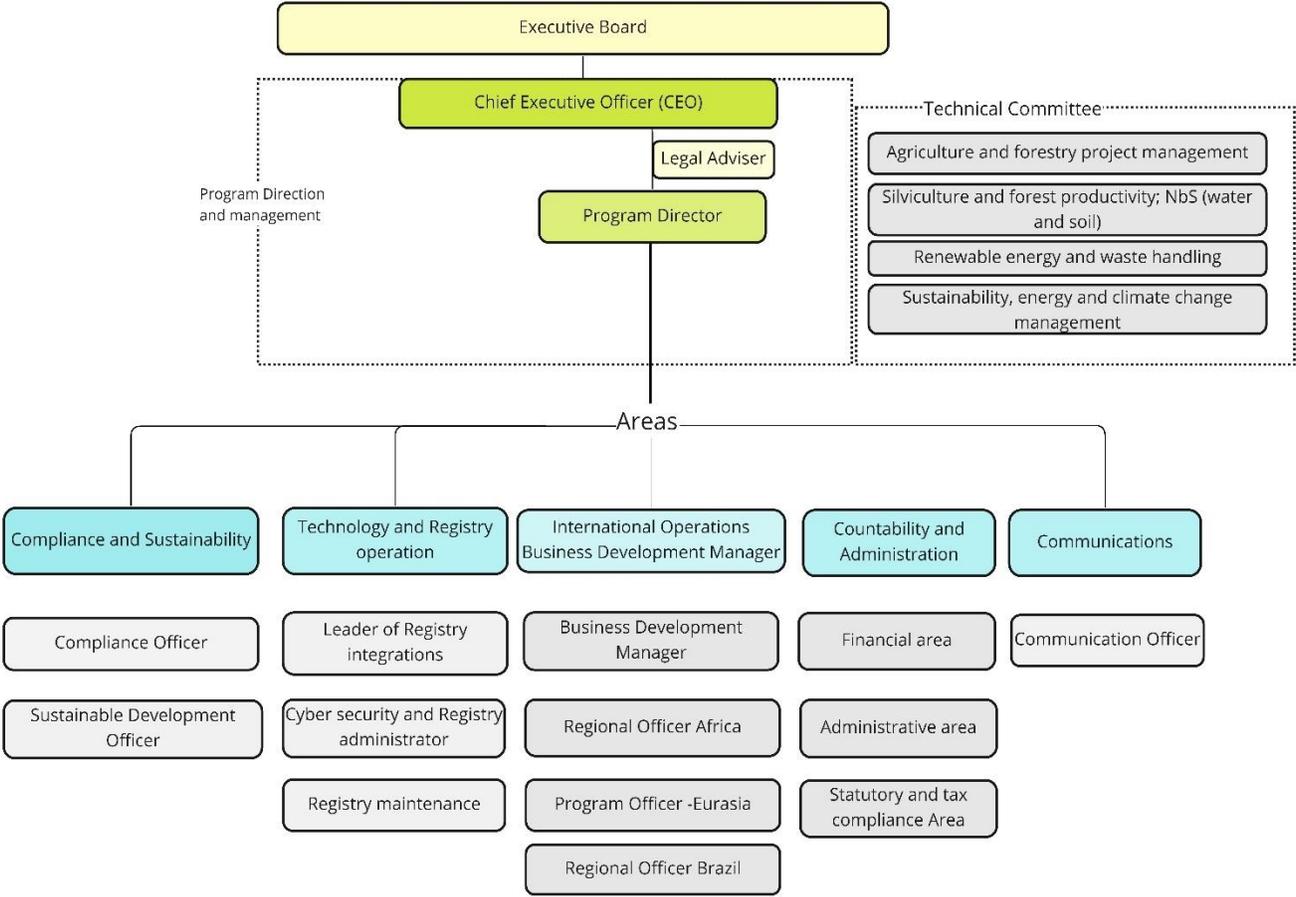
- Stefanny Diaz Rodriguez, Environmental Engineer, MSc. Urban and Regional planning; natural Resources Management and Climate change

Technical Committee Members and advisers

- Cesar Garay Bohorquez, Agricultural Engineer, MSc. Soils and Water; hidrological and hidro-economic modeling, technical and scientific project management, planning climate change adaptation and mitigation measures
- Byron Urrego, Forestry Engineer, MSc. Silviculture and forest productivity; forest Soils, tree improvement, tree nutrition, and silviculture
- Ivan Hernandez, Industrial Engineer; Sustainability, Energy and Climate Change
- Francy Ramirez, BSc in Electrical Engineering, Specialized studies in Social Assessment of Projects, MSc in Environmental Management; Climate Change Mitigation Projects related with energy generation with renewable sources as well as energy efficiency project

Provide an organization chart (in the space below or as an attachment) that illustrates, or otherwise describes, the functional relationship a) between the individuals listed in D; and b) between those individuals and programme staff / employees; and c) the functions of each organizational unit and interlinkages with other units.

**BioCarbon Registry
Organizational Chart March 2023**



Description of roles and responsibilities/ functions are described at the Corporate Government document.

PART 3: Emissions Unit Programme Design Elements

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

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

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

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

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

Provide *evidence*¹⁰ that the programme’s qualification and quantification methodologies and protocols are *in place* and *available for use*, including where the programme’s existing methodologies and protocols are publicly disclosed. (*Paragraph 2.1*)

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

All program’s qualification and quantification methodologies and protocols are available and publicly disclosed on the program website (www.biocarbonregistry.com) in English and Spanish. In the BCR Standard and Organizational Briefing documents Section 10. “BCR Carbon Standards” is described all the information of requirements necessary for the design, development, validation, verification and Certification of GHG projects for the issuance of verified Carbon Credits (VCC). Section 10.3 emphasizes the minimum components required to register a project according to the following sectors:

1. AFOLU Sector: refers to activities of Agriculture, Forestry and Other Land Uses
2. Energy Sector: refers to energy generation activities from Non-Conventional Renewable Energy sources (NCRE)
3. Transportation Sector: refers to GHG mitigation activities applied in the transportation sector.

¹⁰ For this and subsequent “evidence” requests, evidence should be provided in the text box (e.g., web links to documentation), and/or in attachments, as recommended in “SECTION II: INSTRUCTIONS—*Form Completion*”.

4. Sector Waste: refers to GHG mitigation activities implemented through waste management. The detailed information regarding BCR Standards is available on our website. The BCR Standard for the Voluntary Carbon Market (BCR Standard) describes the schema of the Program’s certification, guidelines for the registration of projects, and the set of rules and procedures established for BCR.

Regarding BCR’s methodologies, they are presented below:

- i. AFOLU Methodology: Quantification of GHG Emission Reductions REDD+ Projects
- ii. AFOLU Methodology: Quantification of GHG Emission Reductions from GHG projects GHG Removal activities
- iii. AFOLU Methodology: Quantification of GHG Emission Reductions or GHG Removals from GHG Mitigation Projects-Activities that Prevent Land-Use Change in High Mountain Ecosystems
- iv. AFOLU: Methodology: Quantification of GHG Emission Reductions or GHG Removal Activities that prevent Land use change in Continental Wetlands.
- v. Transportation Sector Methodology: Quantification of GHG Emission Reductions from the conversion of vehicles from gasoline to natural Gas
- vi. Energy sector: Projects Certification and Registration Guidelines -Non-Conventional Renewable Energy sources

It is worth to mention that the methodologies and corporative documents developed before December 2021 make reference to ProClima as Standard since their versions are still valid. Unless adaptations or modifications are made after the changing of the Trademark to BioCarbon Registry, it will appear in the documents disclosed in the BCR website. For instance, essential documentation for new project registration as well as interaction with the Validation and Verification Body (VVB) is disclosed for public consultation on BCR website in Spanish and English.

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

New development of methodology: Natural Savannas is the new approved methodology that focuses on activities that prevent land use change in natural savannas, as outlined under the AFOLU Sector, which was open for public comment from September 13th to October 13th, 2022 (https://biocarbonregistry.com/methodologies/BCR0005_Methodological-document-savannas.pdf).

The document BCR Standard for the Voluntary Carbon Market was updated to Version 3 available at: (https://biocarbonregistry.com/standard/BCR_Standard_en.pdf); however, the section 9. related to this provision for compliance to Paragraph 2.1 (*CORSIA Emissions Unit Eligibility Criteria*) was not the object of modifications. Note that the Energy sector projects eligible under BCR shall apply approved CDM methodologies. All the CDM methodologies accepted by BCR are within the approved scope of eligibility of CDM under the CORSIA eligible emissions units.

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

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

follow-up discussions and questions pertaining to this question:

The Organizational Briefing document title 11.1 describes the requirements to develop new methodologies and steps for the approval process. The development of Methodologies in BCR is in charge of the Technical Committee. If the methodology is produced in collaboration with another organization or natural person, this organization or person must demonstrate to have solid scientific bases, knowledge, and demonstrable experience of 8 years in the field of application for which the methodological development is required.

The development of new methodologies may occur when:

- a) “A GHG mitigation project that has potential additionally characteristics is not included within the types of activities and sectors applicable to existing BCR methodologies, and
- b) There is no methodology within the CDM applicable for the type of activity.

During the evaluation process, it must be demonstrated:

- a. That the methodology includes all the components required by the applicable Standard (such as additionality, aligned with SDG, Baseline or reference scenario among others described in the BCR Standard for the Voluntary Carbon Market (BCR Standard)
- b. The methodology applies the principles of BCR and principles of Certification and Registration.
- c. That the methodology meets the applicable legal requirements.
- d. That the methodology correctly references any method or equation defined by another organization.
- e. That the methodology offers clarity and presents the methods as a procedure in order to facilitate their understanding and application.
- f. That the methodology clearly defines the quantification parameters and provides other relevant definitions for its application.
- g. That the methodology clearly establishes the scope of application.
- h. That the methodology is not contradictory with the requirements established in the Proclima Standard that applies.
- i. That the methodology is relevant to the development context for the country, and is aligned with the national development plan.
- j. That the quantification methods of the methodology include the determining parameters for the quantification of tons of CO₂e according to the type of activity, that the sources or references of the quantification methods are endorsed by a scientific and investigative organization, and that after conduct a pilot quantification exercise, the mitigation results are verifiable and consistent.

All the process of methodologies development and approval process shall be aligned with BCR’s principles and the BCR’s **Corporate Governance** framework. Thus, as part of the process, the methodology goes through Public consultation procedure (See section 8.3 in the Organizational Briefing document once it is approved by the Direction and a delegated from Technical Committee. After success this period and adjusting based on the comments from the public, it can be published on the website and publishing version 1.0 of the document.

The timing for the main steps of methodologies development and approval are:

Steps for methodologies approval – BCR	Time (Working days)
Methodology development by/ or in coordination with the Technical Committee	Depend on each case and the process itself.
Evaluation process (considering criteria described in a) to j) described in	15

Organizational Briefing document title 11.1	
Concept of Approval/Acceptance by the Direction and delegated of Technical Committee after the evaluation of the methodology concept note	5
Adjustment or attend new recommendations if any	7
Public consultation on BCR’s website (Public comment period)	30
Review and address comments and inputs from the public consultation	8
Publication of final methodology on the BCR’s website	3

Follow up questions from 05 May 2022

Are methodologies, validation/verification standards, or public consultation processes officially regulated in the country (or any of the countries) where your program operates?

Answer: Methodologies, validation/verification standards are not officially regulated in the country of operation (nowadays Colombia). The standard follows conditions established by ISO 14064-2:2019(es), ISO 14064-3:2019(es). Moreover, the BCR Standard is underpinned on the rules, procedures, methodologies, and methodological tools that require consistency with national regulation. In Colombia for instance, the national resolution 1447/2018 (on its article 34) specifies that, all methodologies developed by Standards are subjected to public consultation. Based on the Colombian context, the BCR standard is complying with the national guidelines.

BioCarbon Registry knows the importance to develop a proper inception phase, in the countries where the standard is attempting to register new GHG projects. In consequence, exploration of national legislation, is a required task for professionals which serve as a technical bridge in the world such as the case of Brazil and Turkey. The aim of this activity is to ensure operation under the different countries structures and legislation.

If so, does BCR have a procedure for reviewing methodologies or validation/verification criteria for consistency with applicable national standards?

Answer: Yes. BCR has a procedure for reviewing methodologies or validation/verification criteria for consistency with applicable national normative and legislation. The preparation of standard documents and methodologies involves a periodic review of the regulations applicable to GHG project activities. Likewise, with validations/verifications, compliance with applicable legislation is an important component.

Could you confirm whether your protocols for developing new methodologies, establishing validation criteria and public consultations are your protocols aligned with those national procedures?

Answer: Yes, BCR has a complete procedure and protocols for developing new methodologies, establishing validation criteria and public consultations. Section 8.3 of **the Organizational Briefing**.

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

The guidelines and procedures for methodologies development were reviewed and updated in response to the BCR CORSIA application in 2022.

The methodologies development, its review, update, and approval processes are described in the document [“Methodology Development and Approval”](#). An important step to integrate in the process refers to public consultation to ensure a transparent process of development and clear deadlines, and this update stems from the initial guidelines submitted in 2022.

The [Methodology Development and Approval](#) allows the program to provide more detailed and clear orientation for the development of further methodologies and protocols, considering pivotal elements regarding integrity, objectivity and technical robustness. This document includes additional elements of what was established as a guideline in the former Organizational Briefing document (now referred to as *Standard Operating Procedures V.1.0*).

The update provided details for the steps for the submission of MDI (Methodology Development Intention) by Third Parties, and disclosure of approval steps before publishing the final version on the BCR website. Other elements regarding the expertise of team involved in the process and the timeline are presented in [Methodology Development and Approval](#).

The former “Organizational Briefing” as well as the “project cycle” documents (referred to in the 2022 application) are now encompassed in the [BCR Standard Operating Procedures -SOP](#), which informs about the objectives, functions, and procedures to ensure the quality of the process during certification and registration of GHG projects. This adjustment aims to facilitate guidance to projects and the interested parties on the procedures in place at BCR and access to applicable tools.

It should also be mentioned, in response to initial clarification of 05, May 2022, that the BCR Standard establishes guidelines to ensure that project development is aligned with national provisions. See sections 8, 18, and 22.

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

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

The Methodology Development Procedure is described in section **11.1 Development of Methodologies** of the Organizational Briefing document, which is available in English as well as Spanish at the BioCarbon Registry’s website.

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11.1	Development of Methodologies	23
11.2	BioCarbon Registry methodologies	25
11.3	Other Methodologies	28

View of information of methodologies available in the Briefing Organizational document.

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

The BCR Methodologies (including own developments and those that meet the criteria of eligibility from CDM for energy, transport and waste handling sectors) that can be accessed through the link on the BCR website: <https://biocarbonregistry.com/en/methodologies/> did not change between the former application of 2022 and now. However, new document/tool available [Methodologies Development and Approval](#), summarizes the procedure established by BCR Standard and provides clarification on the methodological process, criteria for development, timeline, evaluation, public consultation, and approval.

Question 3.2. Scope considerations

Summarize the level at which activities are allowed under the programme (e.g., project based, programme of activities, jurisdiction-scale): (*Paragraph 2.2*)

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

The standards developed by BioCarbon Registry determine the scope of activities under the program according to the sector and type of activity.

BCR defines the following sectors in its Standards:

- 1. AFOLU Sector:** refers to activities of Agriculture, Forestry and Other Land Uses
- 2. Energy Sector:** refers to energy generation activities from Non-Conventional Renewable Energy Sources (FNCER)
- 3. Transportation Sector:** refers to GHG mitigation activities applied in the transportation sector.
- 4. Waste Sector:** refers to GHG mitigation activities applied through waste management.

BCR’s Methodologies are developed by project type, grouped by sector. Each Methodology specifies which activities are included and excluded from the scope. The project size doesn’t represent a limitation for registration. Projects can be certified and registered on the registration platform. The Voluntary Carbon Market Standard (BCR Standard) clarifies the terms and conditions of the BCR’s scope, the requirement for projects registration, the scale of projects, sectors approached, and specific characteristics for grouped projects among others.

Section 10.3 Project Scale of the BCR Standard describes aspects related to scale for the different sectors approached in the program, following general definitions and the rules established by the Clean Development Mechanism for projects different than AFOLU.

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

Following the elements presented in section A, the BCR program does not present any updates or changes. Nevertheless, it is important to clarify that BCR allows project based and programme of activities (called grouped projects). The jurisdiction-scale is not eligible for the BCR program.

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

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

The BCR Voluntary Carbon Market Standard V2.0 defines the sectoral scope and type of projects. Considering the sectoral scope, the projects which enter for registration need to link their activities within one of the next type of offset activity:

Sector	Supported activity type(s)	Implementation level(s)	Geography(ies)
AFOLU (Summary)	GHG removal activities (These may include silvopastoral, agroforestry systems, commercial plantations and other landscape management tools, as well as oil palm crops and other crops - BCR Standard)	Project-level only	Global
	REDD+ activities (These are GHG projects that implement activities aimed at reducing emissions due to deforestation and forest degradation, as well as promoting conservation, sustainable forest management and increasing forest carbon stocks - BCR Standard)		
AFOLU	Reforestation	Project-level only	Global
AFOLU	Silvopastoral systems	Project-level only	Global
AFOLU	Agroforestry systems	Project-level only	Global
AFOLU	Commercial plantations	Project-level only	Global
AFOLU	Other landscape management systems	Project-level only	Global
AFOLU	Oil palm crops and other crops	Project-level only	Global
AFOLU	Forest Conservation	Project-level only	Global
AFOLU	Forest Conservation & Avoided Deforestation/Degradation	Project-level only	Global
AFOLU	Forest Restoration	Project-level only	Global
Energy	Non-Conventional and Renewable Energy Sources (NCRE) and Energy Efficiency	Project-level only	Global
Transport	All activities of sector 7 of CDM	Project-level only	Global
Waste	All activities of sector 13 of CDM	Project-level only	Global

The identification of the project type is made during the process of project registration in the BCR registry platform. The information related is described in the “project cycle document V3.0”.

The Scope number, describe for each sector is a fundamental part of the serial codification which is assigned to each project register in our registration system.

The standard defines for each project type and sector the methodologies available as follow:

1. AFOLU Sector: refers to activities of Agriculture, Forestry and Other Land Uses. BioCarbon Registry has developed a Methodology for each of the following activities:
 - a. GHG removal activities: Name of the documents: [*Quantification of GHG emission reductions from removal activities*](#)

- b. Activities that generate emissions reductions from deforestation and forest degradation. Name of the document: [Quantification of GHG emission reductions from REDD + projects](#)
 - c. Activities that generate reductions or removals of GHG emissions by avoiding changes in land use in high mountain ecosystems. Name of the document: [Quantification of GHG Emission Reductions or GHG Removals from Sectoral GHG Mitigation Projects-Activities that Prevent Land-Use Change in High Mountain Ecosystems](#)
 - d. Methodology for quantification of GHG emission reduction and removal in Wetlands. Document: [Activities that avoid Land- Use Change in Continental Wetlands](#)
2. **Energy Sector:** refers to energy generation activities from Non-Conventional Renewable Energy (NCRE). BCR adopts the Clean Development Mechanisms (CDM) of the United Nations Framework Convention on Climate Change (UNFCCC).
- a. Only those methodologies established in the document named [Certification and registration of NCRE projects Guidelines](#) are applicable to BCR’s Voluntary Carbon Standards.
3. **Transportation Sector:** refers to GHG mitigation activities applied in the transportation sector. The Methodology was developed by BioCarbon Registry in collaboration with CARBO Sostenible:
- a. Name of the document: [Quantification of GHG Emission Reductions from the conversion of vehicles from gasoline to natural Gas](#)
4. **Waste Sector:** refers to GHG mitigation activities applied through waste management. BioCarbon Registry adopts the Clean Development Mechanisms (CDM) of the United Nations Framework Convention on Climate Change (UNFCCC). Only those methodologies established in sector 13 of the UNFCCC are applicable to BioCarbon Registry 's Carbon Standards.

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

No changes were made to address the eligibility criteria for each type of offset activity.

For more specifics on the current procedures, the references to project Cycle document can refer to **section 14** of the [BCR Standard Operating Procedures -SOP](#), a document that encompasses the practices defined before in the project cycle as well as others applicable for the BCR program that was described in the “Briefing Document”.

Provide *evidence* of the Programme information defining a) level at which activities are allowed under the Programme, and b) the eligibility criteria for each type of offset activity, including its availability to the public: (*Paragraph 2.2*)

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

- a. BCR defines the level at which activities are allowed under the standards as follows:

Organizational Briefing document: The Organizational Briefing document in the Section 10.3 Defines the components of the BCR Standards, determining the type of activities as a mandatory component. Under the minimum components stand out the importance to demonstrate contribution to SDG, demonstrate technical aspects such as Additionality, Baseline or Reference scenario among others described in the figure.

The Voluntary Carbon Market Standard (BCR Standard), describes in the next sections applicable aspects of project types, requirements by activities, and general aspects necessary to register projects at the BCR's Program. English and Spanish versions publicly disclosed on our website.



- **Section 9 Methodological Documents**
- **Section 10 General Requirements** (including project type, location, scale, start date, Quantification periods, Additionality, compliance with applicable legislation and Climate change adaptation.
- As a key criteria, the Standard highlights the link of the project activities with the Sustainable Development Goals SDG's. This aspect is described in **section. 17 “Sustainable Development Goals”** to facilitate this identification, the [SDG toolbox](#) has been developed and can be consulted by the public on our website.

A) Eligibility criteria for each type of offset activity are defined as follows:

- **GHG mitigation in AFOLU** *Quantification of GHG emission reductions from removal activities:* **Section 4.0 Scope, Section 5.0 Conditions of applicability, Section 9.0** Eligible areas for sectorial projects of GHG mitigation in AFOLU.
- **Projects REDD+:** *Quantification of GHG emission reductions from REDD + projects* : Section 3.0 Scope, Section 4.0 Conditions of applicability, Section 8.0 Spatial and temporal Limits.
- **High Mountain Ecosystems:** *Quantification of GHG Emission Reductions or GHG Removals from Sectoral GHG Mitigation Projects-Activities that Prevent Land-Use Change in High Mountain Ecosystems:* Section 3.0 Scope, Section 4.0 Conditions of applicability, Section 7.0 Project limits.
- **Continental Wetlands:** *Activities that avoid Land- Use Change in Continental Wetlands* section 5 Applicability conditions, 10.1 Project boundaries, 11 identification of baseline, and scenario and additionality.
- **Energy Sector** *Quantification of GHG Emission Reductions or GHG Removals from Sectoral GHG Mitigation Projects-Activities that Prevent Land-Use Change in High Mountain Ecosystems:* Section 3.0 scope, Section 4.0 Area of application, Section 6.0 Types of projects and methodologies.

- **Transport:** [Quantification of GHG Emission Reductions from the conversion of vehicles from gasoline to natural Gas](#) Section 4.0 Scope, Section 5.0 Applicability, Section 9.0 Project Limits

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

No changes were made to the eligibility criteria for each type of offset activity. Regarding the level at which activities are allowed under the program, it is important to clarify that BCR allows project based and programme of activities (called grouped projects).

The link to the Energy sector in section A (application 2022) provided access to a different document. Therefore, here we inform that the correct link is: <https://biocarbonregistry.com/en/energy-sector/>

Question 3.3. Offset credit issuance and retirement procedures

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

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

Provide evidence of the procedures referred to in a) through e) (if any, in the case of “c”), including their availability to the public:

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

- Credits Issuance:** The BCR Standard in different sections as section 5, section 11.3 and section 24 provide the set of principles for the certification and issuance of the Verified Carbon Credits (VCC). Likewise, BCR **Organizational Briefing Document** particularly mentioned in Section 16. Emission of Verified Carbon Credits. To issuance VCCs, the technical committee of BioCarbon Registry (Before ProClima), first evaluates the compliance of the Validation/verification information received by the project holders versus the program requirement in order to accept or reject the Credits Issuance VCCs.

the document **BCR Organizational Briefing Document** sets out the Verified Carbon Credits VCC issuance and retirement under the BioCarbon Registry Program.

The **BCR Project cycle** document has specified the process and steps for VCC issuances in **section 6.4**. This process started from the user's request through the BCR registry platform. Then the evaluation of requirement compliance by the BCR team, and if it is satisfactory, a serial number is assigned which encompasses different aspects such as project holder, vintage, project sector, destination, crediting periods among others, key for the traceability moreover to avoid double accounting in our registry, likewise other registration systems/ markets.

The generation of the [BioCarbon Registry serial](#) through the Registration Platform ensures that:

1. The same serial number shall not be issued more than once
2. Serials have an assigned destination and therefore cannot be used for other purposes
3. Once a serial has been withdrawn/cancelled it is deducted from the user's accounting of available VCCs and cannot be used again.

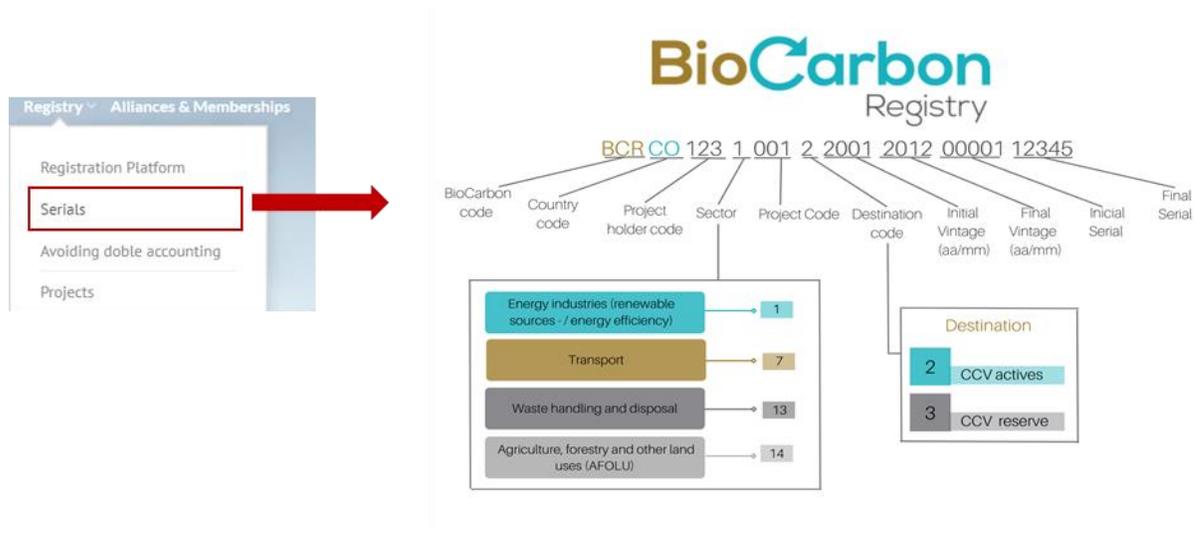


Figure: Serial Identification BCR available on BCR website.

b) Credits retirements/cancellation

The Organizational Briefing Document sets out this procedure in section 17. Transfers and Retirement. Basically, this process is delivered by the Account Holder's request and approval by the BioCarbon Registry administrator. There are four (4) fundamental rules for withdrawals, controlled from the platform:

1. The system does not allow withdrawals from the Reserve destination if a verification period after the verification period for which the VCCs were issued has not been recorded.
2. The system does not allow withdrawals of unavailable amounts.
3. The system does not allow you to request a withdrawal of a serial that is in the process of being approved for withdrawal from a previous transaction.

With each Withdrawal transaction, the system issues a report called Retirement Statement containing all the information about the transaction.

For projects developers and general Account holders of our Registry platform, this information is as well available in the **BCR Projects Cycle document** Section 6.5 Transfers and Retirement and **Manual of use and good practices** of the registration platform Section 6.

- c) **Credits subject of discounting:** The BCR Standard sets out conditions regarding the Renewal of quantifications periods in Section 10.5. Moreover for the AFOLU projects, once the GHG emission removals or reductions (estimated based on the selected quantification methodology) have been registered, the system will automatically discount and maintain a reserve of 15% of the total quantified GHG emission reductions or removals for each verified period. This reserve guarantees the replacement of lost credits by occurring events that require the replacement of credits placed in the market. BCR periodically reviews this percentage and, if necessary, adjust it. The 15% discount on Verified Carbon Credits in each verification period is held in a reserve account for the project they belong to. (See **section 13.1 Risk Management of BCR Standard**).

d) **Length of Crediting periods**

Regarding the renewal of the quantification period, the conditions are described in the [BCR Standard, Section 10.5 Quantification periods](#). In general, the renewal of quantification period requires a reassessment of the baseline scenario, based both on current regulations and on the provision of the BCR Standard.

Projects from other sectors different than AFOLU: Transport, Energy, and Waste have 10 years of crediting periods which can be renovated twice, meanwhile AFOLU can be renewal according to the rules provided by the Clean Development Mechanism.

The Briefing document Section 10.5. Quantification periods sets out the basic information and definition to guide GHG projects holders in the Length of quantification periods according to their corresponding sectors. The [Voluntary Carbon Market standard](#) specifies in **Section 10.4** Start date particularities for each project sector, moreover in **section 10.5 Quantification periods** defines the ranges as follow:

- for GHG removal projects from AFOLU sector, a minimum of 20 years and a maximum of 30 years;
 - for REDD+ projects (AFOLU), a minimum of 20 years and a maximum of 40 years;
- for projects in the energy, transport, and waste sectors, the same rules on quantification periods (crediting period), as defined by the Clean Development Mechanism, shall apply. A maximum of seven years, renewable at most twice, or a maximum of ten years with no renewal option.

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

- a) N/A
- b) There are no changes to inform. We want to notify/clarify that there was a mistake and only three fundamental rules were listed. Here we ratify the four rules that are controlled from the platform (see section 14.5 of the [Standard Operating Procedures](#) before named as the **Briefing document**):

1. The system does not allow retirements from the Reserve destination if a verification period after the

verification period for which the VCCs were issued has not been recorded.

2. The system has an internal procedure that determines the availability of active credits and, therefore, does not allow retirements of unavailable amounts.

3. The system does not allow retirements of unavailable amounts.

4. The system does not allow you to request a retirement of a serial in the process of being approved for retirement from a previous transaction. With each Retirement transaction, the system issues a Retirement Statement containing all the information about the transaction.

c) Discount: There are no changes in the program regarding this aspect. We want to clarify that in the 2022 application, the response about discounting referred to the “reserve”; nevertheless, the BCR program does not apply discounting. The BCR applies a reserve related to permanence and these practices are described in the corresponding section of this application.

d) N/A

e) No changes or updates are declared in this aspect. The response to item was given in item d): for projects in the energy, transport, and waste sectors, the same rules on quantification periods (crediting period) as defined by the Clean Development Mechanism shall apply. A maximum of seven years, renewable a maximum of twice, or a maximum of ten years with no renewal option.

Question 3.4 Identification and Tracking

Does the programme utilize an electronic registry or registries? (<i>Paragraph 2.4.2</i>)	<input checked="" type="checkbox"/> YES
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Provide web link(s) to the programme registry(ies) and indicate whether the registry is administered by the programme or outsourced to a third party (*Paragraph 2.4.2*):

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

BioCarbon Registry has its own registry system, which has been fully developed considering the Conceptual developments (Standard and methodologies) as well as the needs to ensure self-manage by the users, reliability, traceability of processes delivered (for example Verified Carbon Credits issuance, and withdraws among others), and Transparency.

The registry system/ platform is directly available in BioCarbon Registry website: where it is possible to access the information of the BCR registry operation, as well as the Project Registry environment. In the general view, the project list is presented, and key summary information is described such a project holder, title/name of the project, nit of project holder status of the project (Registered or in process), contribution to SDG among others.



The platform shows the list of projects within the BCR registry, summary information for each: sector, Project holder information, Credits issuance. This platform allows external users access to project details by “clicking” in the “Project ID.” In there, it's possible to see aspects such as Project holder information, Project duration, name of project, Sector, Country, localization, and some pictures from the project. The project summary is followed by the Validation and Verification reports attached by the Account user.

The Project’s Registry environment offers three (3) tables:



a) Registered Projects

All projects registered under BCR’s Program are disclosed in this table. By clicking on the Project ID, further public information about the project is revealed, including SDG contribution.

b) Verified Carbon Credits

All VCC issued by BCR is disclosed in this table, including information about the project, the owner, quantification period, serial ID, etc. The table also displays the accountability of the VCC (available and canceled VCC).

c) Transactions and assignment

All VCC cancellations are disclosed in this table. The information includes the final user of the VCC, the serial ID, the quantity, the project name, and the user that leads the cancellation through the registration platform. All the processes and transactions in the BCR registry platform are protected with BlockChain technology which guarantees the fidelity and security of the data storage in the BCR Registry. More Information regarding the BCR cyber security measures can be consulted on the website.

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

The BCR program does not present changes in this section, therefore the structure of the registry remains the same and the following links allow access to the BCR registry website.

- BCR project in process and register information: This table lists all projects registered in BCR’s Program. Clicking on the Project ID reveals more public information about the project, including SDG contribution. <https://biocarbonregistry.com/en/projects/>
- Information VCC from projects: All VCC issued by BCR is disclosed in this table, including information

about the project, the owner, quantification period, serial ID, etc. The table also shows the status of the VCC per project.

<https://biocarbonregistry.com/en/carbon-credits/>

- Information of VCC transactions (retirements): The information includes the final user of the VCC, the serial ID, the quantity, the project name, and the user that leads the cancellation through the registration platform. All the processes and transactions in the BCR registry platform are protected with Blockchain technology which guarantees the fidelity and security of the data storage in the BCR Registry
<https://biocarbonregistry.com/en/transactions/#>

Does the programme have procedures in place to ensure that the programme registry or registries...:	
a) have the capability to transparently identify emissions units that are deemed ICAO-eligible, in all account types ? (Paragraph 2.4.3)	<input checked="" type="checkbox"/> YES
b) identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement? (Paragraphs 2.4 (a) and (d) and 2.4.4)	<input checked="" type="checkbox"/> YES
c) identify unit status, including retirement / cancellation, and issuance status? (Paragraph 2.4.4)	<input checked="" type="checkbox"/> YES
d) assign unique serial numbers to issued units? (Paragraphs 2.4 (b) and 2.4.5)	<input checked="" type="checkbox"/> YES
e) identify in serialization, or designate on a public platform, each unique unit’s country and sector of origin, vintage, and original (and, if relevant, revised) project registration date? (Paragraph 2.4.5)	<input checked="" type="checkbox"/> YES
f) are secure (i.e. that robust security provisions are in place)? (Paragraph 2.4 (c))	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the procedures referred to in a) through f), including the availability to the public of the procedures referred to in b), d), and f):

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

- a) Yes, since BioCarbon Registry directly manages the BCR registry platform, it has the capability to adapt how the information is displayed and categorized to identify the ICAO- eligible emission units. The adaptation of the system will reflect the change (ICAO- eligible units) in the BCR Project’s Registry environment, where projects are listed. A new column will be added under the title “additional certifications”, where CORSIA/ICAO can be displayed and easily identified by the public. The adjustment is considered in the “Manual of Use and Good practices of registration platform” document, **section 7. Additional certifications**
- b) Yes, the registration platform has the capability to assign a unique identification for users, projects, and VCC. Through the Platform, BCR has the capacity to track any registration request, holding user, transfer, and retirement, from issuance to retirement. Also, in the Project’s Registry environment, the public can identify the project and VCC owner, as well as the owner of a VCC in the moment of retirement. The Organizational Briefing Document in section 13.2 Public Register, Section 16.3 Traceability and VCC custody describes aspects regarding tracking and transfer. The Manual of use and good practices of the

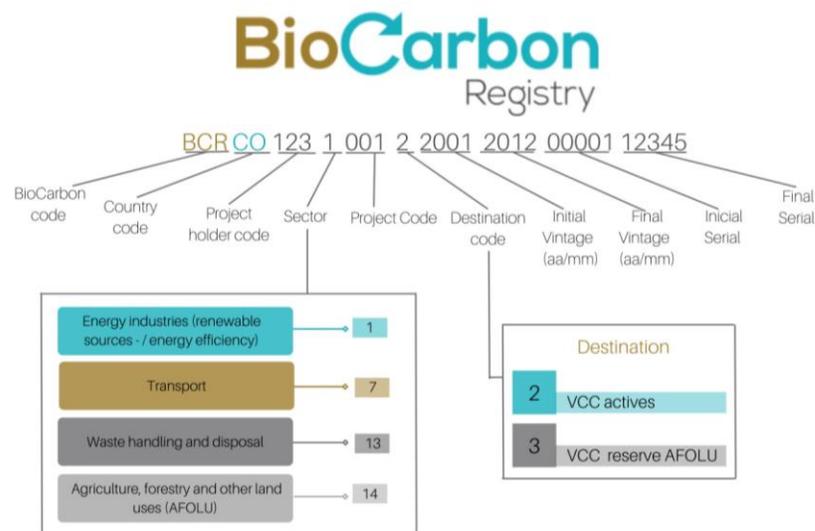
registration platform in Section 9.0 Public Registration of the Registration Platform sets out information for new projects and users.

- c) Yes, the unit status is publicly in the BCR Project’s Registry environment under the “*Verified Carbon Credits VCC*”:



The table displays the quantity of VVC available and retired of a VCC serial. Also, the unit status can be consulted by the user of the registration platform in **his user interface**. The status shown through the interface are i) issued, ii) transferred, iii) retired/canceled, and iv) available. The information related to this procedure is described in *Section 8.0 Public Registration of the Registration Platform Document*, Manual of use, and good practices of the registration platform.

- d) Yes, the registration platform of BCR has been developed conceptually and technologically to ensure that every unit is unique. Thus, the serial ID configuration was designed to assure that there is no other unit identified under the same serial. Moreover, the registration platform has the capability to identify the potential generation of an ID that already exists. In response, the platform software will create a different serial ID guarantying the ID is consistent to the information it shall display.



Serial Identification BCR, V2, 2022.

The [BCR Standard Section 27. Registry Platform](#), indicates that “*BioCarbon Registry has a public registry that allows for the certification and assignment of a unique Serial of verified GHG emissions reductions or removals*” Likewise, the Organizational Briefing Document Section 16 Verified Carbon Credits VCC Issuance details information regarding the serial identification (16.1), Permanence (16.2), and Traceability and custody of VCC (16.3). The Manual of use and good practices of the registration platform in Section 10. Serial Identification informs more about the BCR procedure regarding serial number generation.

- e) Yes, the Serial ID of VCCs encompasses the Country where the project has been implemented, sector of origin as well as the vintage initial and final and more relevant information (see answer c) as follow:

- Name of the Standard (PCR for BCR Registry)
- Country code
- User ID (Project holder)
- Sector
- Consecutive of the project number registered by the user
- Type of destination
- Starting Vintage (yymm)
- Ending Vintage (yymm)
- Initial vintage
- Final vintage

The first five information fields provided by the serial ID represent the project ID, that can be used to deepen information about the project in the public registry. This information is disclosed on the BCR website on the page for [BCR serial information](#) and the [Organizational Briefing Document](#) in **Section 16. Verified Carbon Credits VCC.**

- f) The BioCarbon Registry Platform was developed considering higher requirements to ensure security. The proof is that the software considers the security of the registry through the following components:
- SSL certificate so that the information is encrypted and protected.
 - ReCaptcha by Google
 - Identity validation through email verification
 - Secure passwords
 - Internal control of access to the platform
 - Development based on secure code programming and OWASP policies
 - Server provider
 - Automatic backup
 - Firewall
 - Preventive and corrective maintenance of cyber threats

Moreover, the BCR Registry platform relies on the LACChain, a global alliance led by the Innovation Laboratory of the Inter-American Development Bank Group (IDB LAB). This technology aims to ensure immutability to the valuable information contained in the platform. This is possible through different mechanisms that guarantee the integrity of the data Stored in the BlockChain.

Follow up questions from 26 July 2022

- Could you please explain how your registry would label CORSIA eligible units?
- The BCR application form and registry provides hyperlinks to the Manual of Good Practices for the Registration Platform. However, this link leads to an empty Google Drive folder which can be edited by anyone on the Internet. (link). Please provide a permanent secure link to this document.

Response:

The Registry platform of BCR will facilitate the identification by a “CORSIA label” of the projects Verified Carbon Credits (VCCs), that comply with each of the criteria for CORSIA eligibility. The CORSIA label identification, will be designed by BCR standard and reflected in a column called “additional certifications” which is consider in the Document “BCR Handbook and good practices Registry Platform”. Section 7

As soon as the TAB from ICAO confirms BCR program as eligible Standard to supply emission reduction units under the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), the Standard in a period no more than 15 working days will publish on BCR website the Document of VCCs eligibility criteria for CORSIA. That brief document will ratify the criteria that projects shall demonstrate their activities regarding:

- A) project type which will be the ones described in Appendix B
- B) Vintage eligibility
- C) Crediting period
- D) SDGs contribution
- E) Other consideration that can come as part of the feedback at the end of the assessment by the TAB.

In the meantime, the registry has been adapted to reflect future CORSIA labels that comply with the criteria highlighted.

ISSUANCE DATE	AMOUNT OF CREDITS	SERIALS	ADDITIONAL CERTIFICATIONS	PROJECT ID	PROJECT HOLDER	VINTAGE START (YYYY-MM-DD)	VINTAGE FINAL (YYYY-MM-DD)	RETIRED	ASSETS	COUNTRY
2022-05-05	35,874	BCR-CO-259-14-002-2-1806-1812-0000001-0035874		BCR-CO-259-14-002	Terra Commodities S.A.S.	2018-06-30	2018-12-31	35,874	0	CO

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

- a) In the test environment of the BCR Registry System, the label “ICAO Eligible units” has been included as part of the measures to ensure the ability to respond to the ICAO requirements for unit labelling. Moreover, section 7 of the **Handbook And Good Practices. Registry Platform** textually specifies: “For projects whose Verified Carbon Credit units have additional criteria, such as (e.g., ICAO/CORSIA aviation eligible units, ICROA or other environmental integrity conditions), the Project Registration Platform allows these attributes to be identified through a label, to identify such VCCs. In addition, the registration system contains the procedure for obtaining such labels”.
- b) N/A
- c) N/A
- d) N/A
- e) A correction on the description provided: -Initial vintage and Final vintage should be read as Initial Serial and Final Serial. To be consequent with the description in the graph presented in A (*Serial Identification BCR, V2, 2022*), which did not change.

f) As complementary information provided in section A (application 2022) about security, we inform that BCR's Registry system has a secure access system since, from the moment an account is opened, the following security parameters are followed:

- Data encryption via SSL certificate between our servers and the website
- HTTPS protocol used for Blockchain API calls
- Vultr data centers are used to ensure good physical security of our data.
- Data that is not stored on the Blockchain is located on Vultr certified and secure servers
- Our IaaS (Infrastructure as a Service) provider ensures that servers are fully up-to-date and with the latest security patches, using secure operating systems on all of our unix-based servers
- Any transaction made by an account is fully auditable through our Blockchain and can be seen in our Transaction Monitoring tool.
- Our IaaS provider guarantees the use of firewalls to defend our servers from intrusions.
- Server-side privacy rules to ensure user authentication, (before accessing data), to manage the data that users can access. Personal or sensitive data can only be accessed by the owner thereof and only when logged in.
- Our IaaS provider uses vulnerability monitoring tools to detect potential vulnerabilities in our infrastructure. Additionally, we have vulnerability scanning software for our web assets: Acunetix
- Vultr as our IaaS provider, constantly works with security researchers to identify and resolve vulnerabilities in the system
- Before any development work, first it is uploaded to a test environment in search of vulnerabilities and after being sure to comply with all the security parameters it is passed to production
- IP block for failed attempts via DDoS mitigation service that offers protection against Layer 3 and Layer 4 network attacks
- Two-factor authentication to guarantee secure access to the platform
- There is an account blocking for one hour, for failed login attempts (up to 3 attempts)
- Record of auditable activities
- Integration with service providers, such as Stamping for blockchain traceability
- Email identity verification
- Creation of a secure password that must include a minimum of characters, capital letters, numbers and symbols.
- At the time of entering the platform, double factor verification is made (the system sends a code to the registered email to enter)

Security features are reviewed monthly to ensure they align with industry best practices. Monitors are carried out through cybersecurity software (vulnerability scanning through Acunetix), of all the company's web assets so that, through the development team, they are kept up-to-date and complying with the security policies established within the registration system. More provisions regarding security measures in place can be consulted in Appendix D.

An update in the numbering of sections (but not update to content) occurred since procedures described before in the Briefing document are now sections in the [BCR Standard Operating Procedures \(SOP\)](#). Therefore b) refers to 20.3, d) and e) section 20.

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

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

Currently, BioCarbon Registry has no data exchange with other programs. Nevertheless, if this is considered under the scope of services of BCR, it will develop functions following the carbon markets and international policies and best practices.

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

BioCarbon Registry has strategic alliances with technological leaders in terms of data storage and transactions that are part of the registry, which is why through Stamping.io we can have block chain support for our transactions in nodes on LACChain, Thus, having the services of the Blockchain with DLT technology that allows the creation of digital, secure and synchronized information records, which are continuously updated, recording verified transactions that are tamper-proof and, therefore, immutable, transparent and integral. In addition to having industry-certified server providers where our centralized database is hosted with daily security backups. Our logs are based on Hyperledger Fabric technology, ensuring that all data is recorded (both at rest and in motion), using security technologies such as SSL, 256-bit asymmetric key encryption, and HTTPS/TLS/SFTP protocols. Industry standard technologies such as JavaScript Object Notation (JSON) are used for data exchange via the Application Programming Interface (API).

The BioCarbon Registry Platform has the capacity of integrating safely with other registries through Application Programming Interface (API), moreover, BCR relies on its own Registry System, which ensures all the important data is encrypted. Moreover, the registration platform has been developed in VULTR, a recognized server provider with high security standards, based on secure code programming and OWASP (Open Web Application Security Project) policies, and has the following security measures:

Blockchain technology

SSL Certificate

Double validation factor

Secure Password

Identity validation

Control of entry attempts and record of last entry

Control of cyber threats

In terms of LACChain, it is internationally renowned and has developed an active strategy for a globally known standardization.

Infrastructure recognized by the ITU, the specialized standardization agency of the UN, as one of the fourteen reference blockchain architectures worldwide.

Alignment in accordance with the technical specifications of architecture, taxonomy, and ontology of the ISO

TC307 technical committee, norms TS 23257 & TS 23258
 LACChain ID recognition as a multi-jurisdictional solution in the technical report ISO/TR 23249.
 LACChain DLT recognition with digital identity protocols on ISO/TR 23249:2022
 Recognition of the strategic orchestration figure in blockchain and DLT governance in TS 23635

The referenced information can be accessed through the [Standard Operating Procedures document](#) and [The Handbook and good practices. Registry platform.](#)

Are policies and robust procedures in place to...	
a) prevent the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services? (<i>Paragraph 2.4.6</i>)	<input checked="" type="checkbox"/> YES
b) ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated? (<i>Paragraph 2.4.6</i>)	<input checked="" type="checkbox"/> YES

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

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

- a) Yes, BioCarbon Registry relies on a regulatory document for the management of impartiality in the certification and registration processes of GHG projects. This document defines that the fundamental principle for the management of impartiality, applied by BCR, is that the professional team of the organization will not be part of the certification processes of GHG projects in which the professional would have had some participation. Also, it determines that BCR will not provide consulting or advisory services to any client of the organization.

- b) Yes, BioCarbon Registry, has developed an *Anti-Corruption Risk Assessment* since the second semester of 2021, as phase one of a comprehensive strategy to demonstrate good professional and ethical practices. The Anti-Bribery and Anti-corruption program encompass in **Phase 2: “Drafting of a Code of Ethics and Anti-Corruption Policies and Procedures”**. The outputs of these practices are available disclosed on our website: www.biocarbonregistry.com Home/ Our principles. This process of Anti-Bribery and Anti-corruption program consolidation is delivered in coordination with BDO IT Consulting Ltd, which provides worldwide risk advisory services for companies (<https://www.bdo.mu/en-gb/services>).

Question from initial clarification 05 May 2022:

Pages 27 and 31 of BCR’s application provides a hyperlink to a document on Google Docs entitled “Impartiality Management in the Procedures of Certification and Registration.” That document indicates that “the necessary operational instruments have been implemented to ensure and demonstrate impartiality and the project and individual level”. The document further states that “BioCarbon Registry can provide further details on its procedures for impartiality management upon request from stakeholders.”

- Please indicate how one would navigate to find this document from the BioCarbonRegistry.com home page
- Please provide the further details on these procedures which are available on request

Answer: By accessing corporate governance, you can access the Impartiality Management document (https://biocarbonregistry.com/wp-content/uploads/2022/05/PCR_Impartiality-Management-v2.0.pdf)

One of those procedures is related to conflict of interest which has been developed during the construction of the BCR Code of Ethics

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

The [Code of Ethics](#) and Anti-Corruption Policies and Procedures that were under development during the application 2022 were finalized, and its procedures are in place to ensure monitoring and compliance with best practices. BioCarbon Registry relies on its [Anti-corruption policy and procedures](#) which specifically govern the required behaviors and business conduct regarding fraud, corruption, transnational bribery and/or social misconduct. Those principles and procedures apply for all the BCR personnel, and third parties must adhere to the internal control established to ensure compliance with the policies in this regard. Conflict of interest was an element evaluated during the Risk Assessment. Consequently, procedures to typify activities understood as a conflict of interest and the procedures for communication, investigation, and resulting punishment were defined.

Since April 2022, BioCarbon Registry has set the “**Disciplinary Policy and Procedures**” which is an internal document aimed to ensure that misconduct is not tolerated by determination to take disciplinary action against employees who breach the provisions of the [BCR Code of Ethics](#) and internal policies. The purpose of this Policy is to inform our employees about the possible sanctions in case of misconduct and to set out the disciplinary procedures as well as guidelines with regards to the penalty.

The “[Whistleblowing Policy and Internal Investigations Manual](#)” sets out the Procedures for: internal reporting and follow-up, Conducting investigations, Concluding whistleblowing cases, disciplinary measures, training, monitoring and reporting responsible among other aspects pivotal to ensure clear orientation and implementation the set of measures define in the [BCR Code of Ethics](#), *Anti-corruption policy and procedures*, as well as the management of impartiality in the certification and registration processes of GHG projects, which outlines fundamental principles for the management of impartiality applied by BCR.

To ensure the monitoring and the effective implementation of these policies and procedures, since our CORSIA application in 2022, BCR has created a new area within the BCR Governance structure called Compliance and Sustainability. **The compliance officer** is the professional responsible for monitoring, reviewing, and communicating as well as leading training, in accordance with the procedures established in the “Compliance Officer Manual”

For more information regarding *Anti-corruption policy and procedures*: <https://biocarbonregistry.com/en/anti-corruption-policy-procedures/>

Access to the Anti-corruption policy and procedures are part of internal protocols for the program operation therefore can be accessed by ICAO’s team.

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

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

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

- a) The BCR team has the responsibility and capability to review and evaluate the registry request of every new accountholder. The potential new user shall comply with all documentation requirements and sign up, including but not limited to:
- A document authorizing a person to register the account in the name of the company. The Authorization shall be signed up by the legal representative of the company
 - A declaration where the legal representative declares the legal origin of their funds.

The BCR team check that all information provided is complete and consistent and will decline or accept the new registry through the functionalities provided by the registration platform. See documents disclosed: **Projects Cycle in Section 6.1 Creating an account in the registration Platform**. Manual of use and good practices of the registration platform, Section 2 User registry.

- b) Yes, when there is a new register request, BCR checks decline or accept the new registry through the functionalities provided by the registration platform, considering the review of the documents attached to the system. Suppose the documentation is appropriate but the type of account selected by the potential account holder is not adequate. In that case, the BCR team can choose the account type or suggest it to the potential user before declining or accepting the request. In the Manual of use and good practices of the registration platform, Section 2 User registry, and Project cycle **Section 6.1 Creating an account in the registration Platform** sets out the three types of account that define the functionalities and restrictions the users/accounts holders have within *the* registration platform. These three types are:

- General account holder
- Project-owner account holder
- Aggregator account holder

- c) Yes, provisions are in place for preventive and corrective maintenance of cyber threats is performed once every three months by informatic experts: prevention of unauthorized entry to the website as plugins and code (hacking), elimination of recurrent hacking, and prevention of modification of site content. Maintenance also includes a review of the operating system configurations, scanning of vulnerabilities, analysis of security into all sites (Blackbox, Greybox, Whitebox), detection and identification of malware present on the server, implementation of recommendations, and server configuration settings, and site remediation. See **Section 13.3 Security of the Registry** of BCR Organizational Briefing Document V2.

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

- a) BCR has implemented the personal Screening procedure and sanctions linked to companies requesting to open an account with BCR, following the recommendations of the exhaustive analysis during the design of the anti-corruption policy and associated procedures in place.

This procedure is informed to users during the opening account process within the BCR Registry’s platform, being necessary the “*consent to the processing of personal data*”. In order to proceed with the screening of persons and entities against sanctions lists.

This procedure is included in the [Handbook and good practices registry platform](#) that specifies the personal and company’s information required by the user while opening account. The Declaration of source of funds and the authorization for opening account inform about the use of this information to check world data bases such as Sanctions List. This reinforces measures and controls aligned to the [code of ethics](#) and good practices, the anti-corruption policy and established procedures.

- b) Procedures before mentioned on the Project Cycle document can be found in section 14 of the [BCR Standard Operating Procedures \(SOP\)](#).

All the measures mentioned are part of the provisions in place to ensure the effective screening of requests of BCR registry accounts and based on official information public published lists by governments¹¹, law enforcement, and international bodies take decisions on whether it’s necessary to restrict the opening account process of users.

- c) Security of the Registry System is now covered in Section 17.3. of the [BCR Standard Operating Procedures \(SOP\)](#).

Security features are reviewed monthly to ensure they are in line with industry best practices. Monitors are made through cybersecurity software (vulnerability scanning through Acunetix¹²), of all the web assets of the company, so that, through the development team, they are kept updated and complying with the security policies established within the registration system. Details are provided in Appendix D of this application and the [BCR handbook and good practices registry platform](#) Section 11. Registry platform’s security

Question 3.5 Legal nature and transfer of units

Does the programme define and ensure the following:	
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¹¹ Such as the Office of Foreign Assets Control – OFAC (<https://sanctionssearch.ofac.treas.gov/>) and other sources of persons and entities screening against sanctions list provided by a supplier company.

¹² The Acunetix vulnerability scanning application, which use Interactive Application Security Tests (IAST) through technologies such as: DeepScan, SmartScan, AcuMonitor and AcuSensor, and continuous integration systems: Teamcity, Bamboo, Azure DevOps and GitLab.

a) the underlying attributes of a unit? (Paragraph 2.5)	<input checked="" type="checkbox"/> YES
b) the underlying property aspects of a unit? (Paragraph 2.5)	<input checked="" type="checkbox"/> YES

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

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

a) Yes, [BCR Standard](#) establishes attributes and requirements for carbon. The carbon rights are defined by the ownership of the CCV and represent the benefits obtained by owning a VCC, such as payments or benefits received for the reduction of emissions or GHG removals. The Voluntary Carbon Market Standard defines in **Section 7** the principles followed by BCR regarding the Verified Carbon Credits VCC that project holders and all those involved in the design, development, validation, verification, and certification of GHG should apply. Those principles refer to Pertinence, Total coverage, Coherence, Accuracy, Transparency, and conservative attitude.

The [BCR Standard](#) **In Annex A**. Glossary of terms define Carbon Credit as a measurable and tradable unit, accounted for a GHG project. This unit is equivalent to one metric ton of carbon dioxide equivalent.

b) Yes, the [BCR Standard](#) **Section 12. Carbon Ownership and rights** define clearly the characteristics and conditions to ensure the legal and transparency in the rights and ownership of carbon, which shall demonstrate, among other aspects, evidence of a process based on “*full, prior and informed consent.*” This is fundamental considering that projects can be implemented within territories of ethnic groups or traditional local communities. Thus, BCR has established procedures to guarantee respect to the local communities' rights and ensure alienation with the applicable national law.

GHG project holders shall demonstrate carbon rights with agreements and documents that ensure this requirement is met. This information is requested as a condition for project registration in the BCR Registry system. Details about the type of documents requested and particular requirements are described in Section 12. Carbon ownership and right in the [BCR Standard](#).

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

- a) N/A
- b) N/A

Question 3.6 Validation and verification procedures

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

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

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

Yes, BCR only issues Verified Carbon Credits (CCV) for GHG emission reductions or removals that have been validated and verified by a Conformity Assessment Body (CAB) that complies with the principles and requirements related to competence, coherence, and impartiality. The BCR Standard, sets out in Section 22. Validation and verification the information for projects, who shall ensure validation and verification processes are carried out by a body independent of the GHG program or carbon standard.

They shall confirm that the CAB meets all accreditation requirements. See Section 22.1 Validation, 22.3 Other consideration for validation and verification and in Section 22.4 Validation or verification statement which inform to the public about the issue process that CAB shall be delivered to BioCarbon Registry, according to ISO 14064-3, the principles to be applied in the validation and verification processes are the following: Independence, integrity, impartial presentation, due professional care, professional judgment, and an evidence-based approach.

- a) Yes, Section 22.2 of the BCR Standard sets out the criteria for verification. For verification is applicable as well the conditions stated in Sections: 22.3 Other consideration for validation and verification and section 22.4 Validation or verification statement. Additional information such as the Manual for the validation and verification of GHG mitigation projects with precise requirements and specific instructions that Verification and Validation bodies shall comply with is publicly on BCR website.
- b) and d)

Yes, section 22.3 Conformity assessment bodies, indicates all the criteria and framework for the validation and verification process. Moreover, details that those process shall be carried out by accredited by:

- (a) an accreditation body that is a signatory member of the International Accreditation Forum (IAF) that has in its portfolio GHG Emissions Verification Body accreditation program under the requirements of ISO 14065; or,
- (b) the Clean Development Mechanism (CDM) or whoever acts in its stead, under the requirements of the UNFCCC for Designated Operational Entity (DOE), as appropriate.

The public can consult more details by accessing the BCR Organizational Briefing document. Section 12. Validation and Verification Bodies (VVM) and BCR Standard (Section 23).

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

There are no changes in the rules or procedures. However, there was an update in the version of the documents that was made to strengthen measures and provisions of anti-corruption, anti-bribery and avoidance of conflict of interest.

The BCR Standard was updated to version 3 and thus all references and links have been updated. References to the BCR Organizational Briefing document should refer to [BCR Standard Operating Procedures \(SOP\)](#). The BCR Website also was updated.

The [Manual for the validation and verification](#) of GHG mitigation projects for CABs was updated, reinforcing aspects of impartiality with links to the corresponding policy and procedures for anticorruption that encompasses conflict of interest. See section 8.2.4 Compliance with BCR Antibribery policy.

It is worth mentioning that from the implementation of the anti-corruption policy in April 2022, the CABs also have been subject to an explicit declaration of knowledge of the policy, whereby they attest to having no conflict of interest in their activities.

Question 3.7 Programme governance

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

Provide evidence that this information is available to the public:

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

- a) Yes, BioCarbon Registry informs through the Corporate Governance document disclosed on the [BCR web page](#), who is in charge of decision-making processes in the company. Moreover, the document sets out the structure and areas existing in the BCR and the responsibilities for each. The executive board of BCR supports the Direction for high-level decisions making. Director manages, administrates, and legally represents the company; thus, the Direction is directly responsible for the administration of the Program. More information is available in *Section 5. Organizational structure*.
- b) Yes, first, the **Corporate Governance** establishes the set of rules procedures that regulates the company’s structure and operation as well as the relationships among areas for communication and decision making. In consequence, the document BCR Organizational Briefing document V2. Sets mechanisms and procedures that project holders and users of the BCR registry shall follow. For instance, the Development of new methodology.

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

From 2022, the Governance structure was expanded, and roles and functions reorganized to ensure a flow in between the areas (horizontal) as well as clarify responsibilities for decision making (vertical). A new area of compliance and sustainability was integrated within the BCR structure (refer to [Corporate Governance](#)), details regarding decision making about methodologies development and approval were analyzed and described in the

“Governance document.”

The Briefing document has been replaced by [the BCR Standard Operating Procedures \(SOP\)](#) document, which encompasses all the general procedures applied by the BCR program.

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

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

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

- a) Yes, the Company was founded in 2018 as ProClima ESAL. Since then, it has been dedicated to the certification and registration of Greenhouse Gas (GHG) projects and promoting climate change actions. The company has developed its program promoting low-carbon growth while ensuring compliance with national and international policies. In 2022 the trademark ProClima changed to BioCarbon Registry, as a comprehensive internationalization strategy that seeks compliance with international criteria for Voluntary Carbon Market and strengthening linkages between climate change mitigation actions with climate adaptation, Biodiversity, SDG, and more good practices.
- b) Yes. Since the foundation, the company has been operational by developing standards and methodologies. A VCC certificate was issued in May 2019. The first version of the Carbon Standard was developed by ProClima (nowadays BioCarbon Registry) was disclosed on December 10, 2019. Since then, all projects’ registries and VCC certifications have been evaluated under this standard. In February 2022, The Standard for Carbon Market V2 was published, and it reflects the merged criteria used for regulated markets as well as the ones applicable for voluntary carbon markets. The change from ProClima to BioCarbon Registry was just related to the name since the Conceptual, functional, and principles continue responding to the bases established since 2018.
- c) Yes, [BCR Standard](#) has established conditions related to its mission which specified structural terms for long-term administration. The information is available on the website. Moreover, Verified Carbon Credits emitted by BCR Standard and registered under our Registration System, have a long-term value and they were obtained considering compliance with quality and quantitative bases. The VCC could potentially be transferred to other registries. Nevertheless, this scenario, besides being possible, is not considered in the short, medium, or large time by the Direction of BioCarbon Registry.

Initial clarification 05 May 2022

Page 31 of the application states that “BCR Standard has establish conditions related to its mission which specified structural terms for long-term administration. The information is available on the website.” Please clarify what these conditions are and where they can be found on the website.

Answer: Biocarbon Registry has expressed as part of its objectives (title 2. [Corporative Government](#)) that the program aligns its “performance in the search for sustainable growth and its long term presence in the market”. It means from the principles (title 3 [Corporative Government](#)) that is based on trust, transparency and accountability that fosters long term investment, up the operation of the Registry system, and ensures the provision of services in a long term.

As it was mentioned on the application, Verified Carbon Credits emitted by BCR Standard and registered under our Registration System, have a long-term value and they could potentially be transferred to other registries. Nevertheless, this scenario, is not considered in the short, medium, or long term by the Direction of BioCarbon Registry, which ratifies its commitment with the compliance of the objectives in the long term by relying on BCR team expertise, their background with more than 25 years on the sector and commitment with quality in all BCR operations.

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

Error in numbering was corrected.

- a) N/A
- b) N/A
- c) Regarding the follow up question, Biocarbon Registry expresses as part of its objectives (title 2. [Corporative Government](#)) that the program aligns its “performance in the search for sustainable growth and its long-term presence in the market”. Its principles (title 3 [Corporative Government](#)) are based on trust, transparency and accountability that foster long term investment, the operation of the Registry system, and the provision of services in a long term. BCR relies on an operational and financial plan that includes a financial reserve for the operational functioning of the company.
- d) The VCC could potentially be transferred to other registries. While this is possible, it is not expected by the Direction of BioCarbon Registry, which ratifies its commitment with the compliance of the objectives in the long term by relying on BCR team expertise, with more than 25 years in the Carbon Market, and commitment to quality in all BCR operations. BCR Executive Board and Directors manage the overall governance of the entire organization and in the event of dissolution will makes decision to resolve standards-related issues.

Although the dissolution of BCR is unlikely, it is essential to consider unforeseen events as part of the program's strategic planning. BCR relies on a short-term and long-term strategy which includes the procedures to be followed in case of dissolution of the program, among which include: a) A policy of maintaining a financial reserve to support the operation in case of contingencies, b) valid professional liability insurance policy c) Project owners have options to deregister projects for any reason and credits issued in the remaining quantification periods under robust conditions to ensure transparency and measures for traceability.

Are policies and robust procedures in place to...	
a) prevent the programme staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of programme services? (<i>Paragraph 2.7.3</i>)	<input checked="" type="checkbox"/> YES

b) ensure that, where such conflicts arise, they are appropriately declared, and addressed and isolated? (<i>Paragraph 2.7.3</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to in a) and b):

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

- a) Yes, BCR has developed a regulatory document for the management of impartiality in the certification and registration processes of GHG projects. This document defines that the fundamental principle for the management of impartiality, applied by the company, is that the people involved in the organization's professional team will not be part of the certification processes of projects in which the professional would have had some participation. Also, it determines that BioCarbon Registry will not provide consulting or advisory services to any client of the organization. These statements are considered in the contractual agreements signed by the BCR staff.
- b) Yes, it was considered under the scope of the Anti-Corruption Risk Assessment, which was developed in coordination with DBO It Consulting, a worldwide leader company in business advocacy and good practices. Nevertheless, the score obtained for the conflicts mentioned was not considered relevant to take corrective actions. The anti-corruption plan in which BCR is successfully finished Phase one of three considered, establish review periodically of the threats identified and project coherently preventive and corrective measures to ensure the transparency and following code of good practices in all the scope of action of the BCR program. Access to outputs obtained for Phases in the process of consolidation of the plan is available in our website/home/our good practices.

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

The following Updates have been developed regarding the procedures in place:

Anti-corruption policy and procedures in place from 2022.

The procedures complement control and monitoring measures already implemented in the program, in addition to ratifying commitment of the program with zero tolerance with unethical practices. BioCarbon Registry relies on its ***Anti-corruption policy and procedures*** including the “**Disciplinary Policy and Procedures**”, which specifically govern the required behaviors and business conduct related to fraud, corruption, transnational bribery and, social misconduct including conflict of interest.

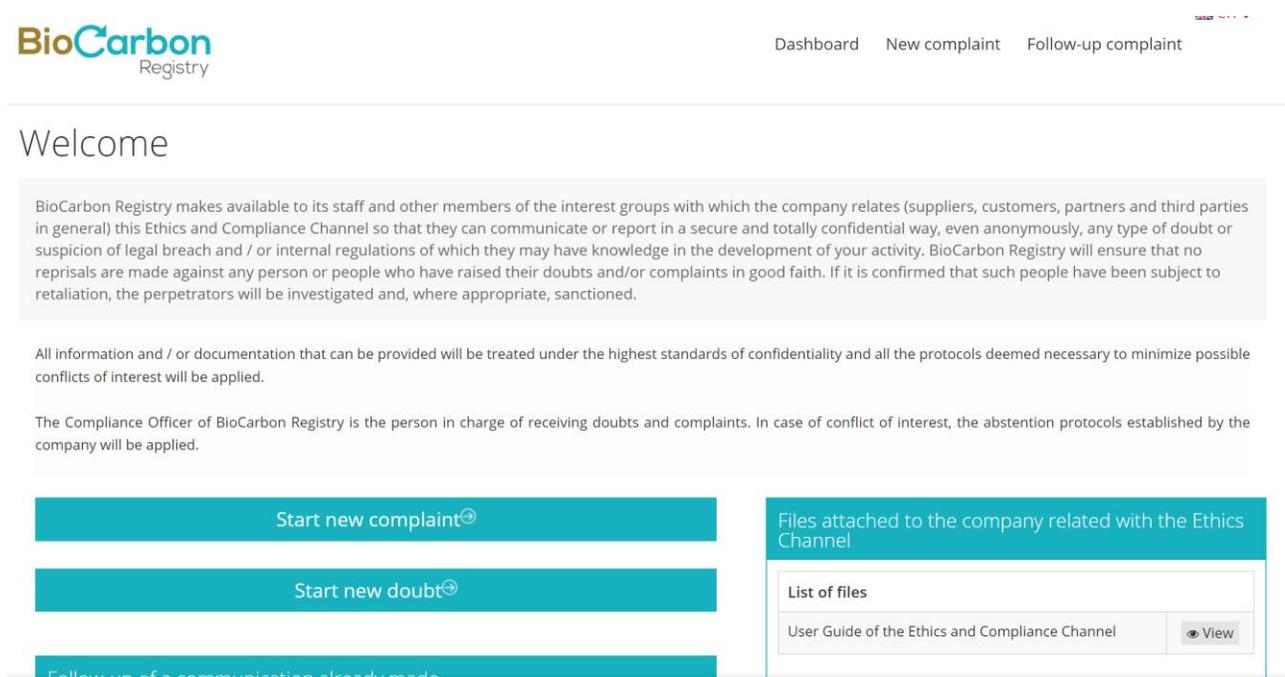
The purpose of this Policy is to ensure that BioCarbon Registry complies with its Anti-Corruption requirements and to demonstrate to our interested stakeholders that we are committed with the Principles of the United Nations Global Compact in the area of Anti-Corruption, providing effective enterprise risk management through a focus on legislative compliance with both the local and the international Anti-Corruption Regulations and Standards.

Anti-Corruption laws, regulations and standards include provisions that promote accountability and governance and, as such, BioCarbon Registry has established comprehensive and effective governance measures in place to

comply with these provisions. The aim of these measures is to ultimately minimize the risks of fraud, transnational bribery and corruption.

The “[Whistleblowing Policy and Internal Investigations Manual](#)” sets out the Procedures for: internal reporting and following-up, Conducting investigations, Concluding whistleblowing cases, disciplinary measures, training, monitoring and reporting responsible among other aspects pivotal to ensure clear orientation and implementation the set of measures define in the [BCR Code of Ethics](#), *Anti-corruption policy and procedures, as well as [the management of impartiality](#)*

The Ethics and compliance channel (<https://canaletico.es/en/biocarbonregistry>) was established last year as a fundamental piece to support and contribute to the implementation of the code of ethics and ensure effective implementation. The Channel is set up to enable the communication of concerns, doubts, breaches or violation of the Code of Ethics.



<https://biocarbonregistry.com/en/code-of-ethics/>

Link importance of Compliance Officer and anticorruption policies and procedures:

<https://biocarbonregistry.com/en/anti-corruption-policy-procedures>

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

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

BCR requires VVB to provide evidence about their professional liability insurance policy according to the Agreement signed between the Validation and Verification Body of GHG mitigation projects and BioCarbon Registry. Numeral g) of the Second Article of the agreement states: “SECOND. Obligations of the VVB(g) demonstrate that they have professional civil liability insurance, giving scope to what is established in Article 2.2.1.7.8.6 (Professional civil liability policies of Conformity Assessment Bodies), of Decree 1595 of 2015, that which modify or update it, or whatever applies...” BioCarbon Registry (Before ProClima) does not have a liability insurance policy. Nevertheless, if necessary, a professional liability insurance policy could be acquired by BioCarbon Registry (Before ProClima). This information is available in the Agreement subscribed between BCR and CAB. BCR recognizes the importance of the liability coverage as part of the requirements to perform as a Standard that contributes to the international aviation sector offsetting. Therefore, The program will formalize the insurance as a prioritized measure derivated of the acceptance to CORSIA. Preliminary exploration has been taking place led by the Legal area of BRC regarding requirements and steps for the liability coverage from the program.

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

BCR is in the process of acquiring the professional liability insurance policy with [THB Group](#). In consequence, we expect to receive the professional insurance in the short term and will provide the proof of insurance to ICAO as soon as it is available. More information [Link](#).

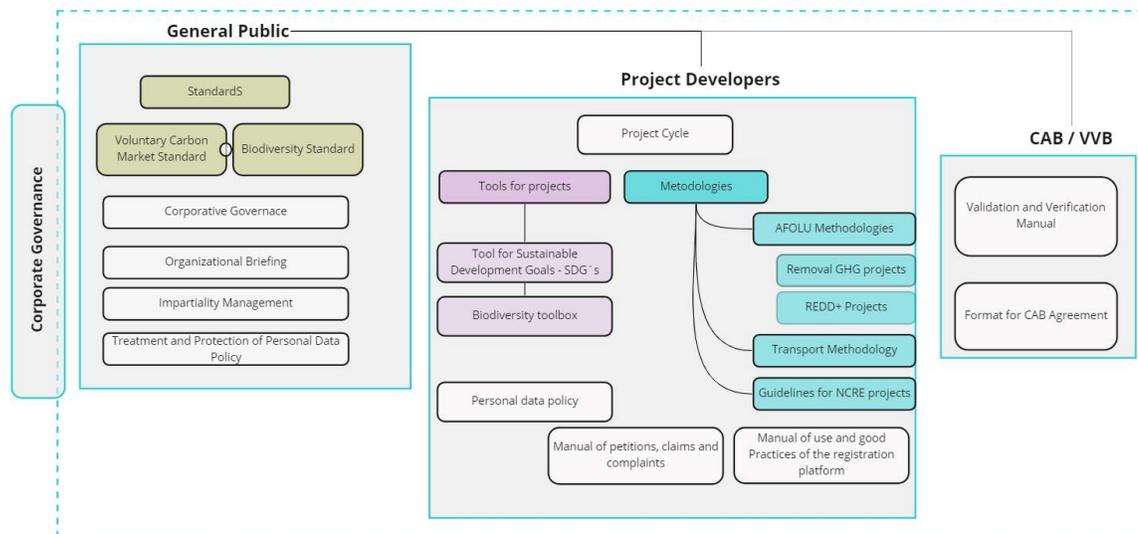
Question 3.8 Transparency and public participation provisions

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

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

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

- a) Yes, the Organizational Briefing Document Section 13.2 Public Registry sets out what information is available to stakeholders. In general, the information that BCR made available for stakeholders are:
 - 1. Governance documents (standards, methodologies, manuals, documents related to Proclima’s organizational structure, and forms).



Display: Structure of information available to the public BCR, 2022.

2. In the Projects relevant information (display through BCR website in the Project's Registry environment). Information is disclosed according to best practices and international regulation (Project owner, location, duration, standard applied, VVB, verification, and validation report, pictures, project location, country, description, SDG contributions, and co/benefits).
3. The public registry also displays information issued by BCR like VCC emissions and retirements.

The [BCR Standard](#) section 16. Stakeholder's consultation sets out the base for this process and the ways for verification.

- b) Yes, according to the Guidelines of the [BCR Standard](#) section 16. Stakeholder's consultation, projects holders shall carry out a stakeholder consultation, before validation, to report on project activities and design, as well as to facilitate access to all information related to the potential environmental and social effects of the project. This information is reviewed by the BCR staff when projects upload the information requests by the Registry platform. During the Validation and Verification process led by the VVB, this is one of the criteria that shall be described in the final report. The BCR manual of Validation and Verification of in **section 9.1 Validation** mentions all the criteria that VVB shall approach within the standard's scope and explicitly mentions (k) stakeholder consultation. Moreover, **section 10. Validation and Verification requirements** consider the stakeholder consultation as one of the General requirements for registration.

For the Program developments such as Standards and Methodologies, following Transparency principles expressed in the BCR Standard, structural BCR documents like Organizational Briefing **section 8.3 Public Consultation**. The procedure for public consultation is described. **Section 8.3** sets out, for instance, the content that methodological documents should contain and the deadline of the process and the next steps after the public consultation period.

- c) The BCR Standard, **Section 16.1 Public Consultation** sets out, procedure public consultation for projects. The projects are open for comments for a period of 30 calendar days. During this period, interested parties should request to BioCarbon Registry (info@biocarbonregistry.com), and to the project holder the documentation related to the project under validation. At the end of the public consultation period, BioCarbon Registry will send the comments received to the project holder. Once comments are received,

the project holder shall consider all comments received during the consultation period. If applicable, it shall adjust the project design or demonstrate that the comment is not relevant. For its part, the Conformity Assessment Body shall demonstrate that it has examined the information related to the stakeholder comments and include a conclusion on this in the validation report.

Likewise, the **Guidance Development of Methodologies** refers to the steps necessary for methodologies review and approval and the timing estimated for each.

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

- a) N/A
- b) N/A
- c) N/A

The program has not resulted in any changes to the specific elements related to transparency and public participation provisions. As a result, responses provided in Section A can be refer to sections in the following documents.

The BCR Organizational Briefing document (replaced by [Standard Operating Procedures \(SOP\)](#))

[The BCR Standard](#)

[The BCR manual of Validation and Verification](#)

Development of document “[Guidance for Methodology development](#)” (before a section in the Briefing Document).

Does the programme conduct public comment periods relating to... (<i>Paragraph 2.8</i>)	
a) methodologies, protocols, or frameworks under development?	<input checked="" type="checkbox"/> YES
b) activities seeking registration or approval?	<input checked="" type="checkbox"/> YES
c) operational activities (e.g., ongoing stakeholder feedback)	<input checked="" type="checkbox"/> YES
d) additions or revisions to programme procedures or rulesets?	<input checked="" type="checkbox"/> YES

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

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

a) Through the preparation and consolidation of BCR standards and methodologies, the company seeks to reduce the risks associated with the certification and registration of GHG projects, and to strengthen and conservatively maintain the interests of the stakeholders. To optimize the implementation of BCR standards and methodologies, the program requires that every Standard and Methodological Document be submitted to the public consultation process. BCR Organizational Briefing Document V2 **Section 8.3 Public consultation.**

b) According BCR Standard, the projects are open for comments for a period of 30 calendar days. The start date of the consultation for comments corresponds to the day on which the project appears on the registry page. The complete description about this requirement is in **section 16.1 (BCR Standard)**. Its important to mention that BCR shall address each comment and responses are public.

The application of the public consultation process is a fundamental function to improve the continuous interaction between BCR and all interested parties, and to respond to the application of the principles of the BCR program, essentially responsibility, quality, and integrity. Likewise, consultation with interested parties guarantees the right to intervention that citizens have. Through the process, they can participate freely, individually, or collectively to directly influence decisions on standards and methodologies.

BioCarbon Registry discloses and communicates to the public which documents and when the public consultation is taking place through the web page and social media. Also, BCR discloses every consultation result in the BCR web page to the public. The public consultation procedure is disclosed in the **BCR Standard Section 16.1. Public Consultation**, as well as the Organizational Briefing Document V2. **Section 8.3 Public Consultation Procedure**.

d) Yes, each document presents the history revisions: number/ version and date of issuance. Likewise, the communication team discloses the new program procedures or rulesets through media (Facebook, LinkedIn and webpage).

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

As mentioned in other sections, what previously referred to the Organizational Briefing Document, now refers to [the Standard Operating Procedures \(SOP\)](#).

Question 3.9 Safeguards system

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

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

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

- a) The BCR Carbon Standard establishes the requirements for the analysis of the foreseeable potential effects on biodiversity and ecosystems generated by the activities of the projects. The BCR Standard safeguards applicable to the type of activity to identify, evaluate and manage the environmental risks inherent to the implementation of the project. **Section 14 Environmental aspects, and Section 15 Socioeconomical aspects**. For REDD+ projects the [BCR Standard](#) sets out through **section 18 REDD+ Safeguards**, all aspects concerning this type of projects.
- b) The [BCR Standard](#) establishes requirements for the analysis of the foreseeable potential effects on the socio-economic aspects of a population generated by the activities of the GHG project. They also establish the

safeguards applicable to the type of activity to identify, evaluate and manage the social risks inherent to the implementation of the project. See **Section 15. Socioeconomic aspects**.

Question from initial clarification 05 May 2022

Section 14 and 15 establish requirements for projects to undergo an environmental assessment and to analyze socioeconomic effects, respectively. What are the formats, procedures and/or reporting requirements relating to these assessments and analyses?

Answer: The BCR Standard requests to VVB that as part of the validation and verification process, the environmental and socioeconomic assessments shall be considered and clearly presented by the project holders as part of the requirements or the certification. This is explicitly described in the “[Validation and Verification Manual](#)” section 9.1 and 9.2 plus section 10. Validation and verification requirements. It means the process is clearly defined, since the OVV shall assess environmental and socioeconomic aspects during the evaluation for the GHG mitigation activities and deliver the report to BCR where the technical professionals review the provided information and can request further clarifications or alert about inconsistencies or information leakages presented.

From Live Questions August

As TAB understands it, the relevant portions of the BCR Standard are sections 14 and 15, which obliges project holders to analyze “probable effects on biodiversity and ecosystems”, as well as the “significant socioeconomic effects” of the activity

- What framework or parameters would project owners be required to follow in conducting these analyses?
- What indicators would the Conformity Assessment Body (CAB) use to assess whether these analyses by a project owner are sufficient to meet the BCR Standard? On what basis could a CAB claim that an environmental or socioeconomic analysis was insufficient?

Answer: The project holders shall make a complete evaluation of the possible environmental effects based on the Project activities. There is no specific “parameter framework” requirement to do such an analysis. The evaluation must be complete and well justified, considering valid evaluations. What is expected is that project holders follow national guidelines to address the assessment of environmental and social aspects since the BCR standard mentions explicitly: “(...) environmental plan or that which is contemplated in the legislation of the country in which the project is developed”. [See sections 14 and 15 BCR Standard](#).

14 Environmental aspects

Without prejudice to the fact that, due to the development of the proposed activities within the context of the project, the project holder is obliged to develop an environmental management plan or that which is contemplated in the legislation of the country in which the project is developed, the project holders must carry out an environmental assessment, analyzing the probable effects on biodiversity and ecosystems within the limits of the project. The analysis must be supported with reliable and recent references.

Suppose this assessment leads to the conclusion that adverse effects would generate. In that case, the project holder shall define actions and corrective measures to prevent and when applicable to diminish the environmental effects derived from the development of the GHG project activities.

15 Socioeconomic aspects

GHG project holders shall analyze the significant socioeconomic effects of project activities within the project boundaries, clearly explaining the assumptions used and justifying the review results. The assessment shall also refer to related documentation and evidence.

Suppose this assessment leads to the conclusion that adverse effects would generate. In that case, the project holder shall define actions and corrective measures to prevent and when applicable to diminish the social and economic effects derived from the development of the project activities.

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

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

BCR has made updates regarding the linkages between environmental and socioeconomic safeguards and no net harm has been explicitly reinforced.

Sections 14 and 15 of the BCR Standard regarding environmental and socioeconomic aspects respectively now include an explicit requirement “The project holder shall demonstrate that the project activities do not cause any net-harm to the environment. For this purpose, the project holder shall apply the BCR Tool. [No Net Harm Environmental and Social Safeguards \(NNH\).](#)” In this way, the project holders shall make a complete evaluation of the possible environmental effects based on the Project activities. The evaluation must be complete and well justified, considering valid evaluations. What is expected is that projects holders follow national guidelines to address the assessment of environmental and social aspects since the BCR standard mentions explicitly: “(...) *environmental plan or that which is contemplated in the legislation of the country in which the project is developed.*”

[The NNH Tool](#) provides guidance to identify and address any negative environmental and socio-economic impacts of project activities in addition to the engagement with local stakeholders during project development and implementation. It presents the general requirements to be met by the project holder in terms of prevention and/or reduction of negative effects, required evidence to support the evaluation and provides a framework for risk management and monitoring of environmental and social impacts.

No net harm shall be evaluated during validation and verification activities. The environmental and socioeconomic assessments shall be considered and clearly presented by the project holders as part of the requirements of the certification. This is explicitly described in the “[Validation and Verification Manual](#)” section 9.1 and 9.2 plus section 10. Validation and verification requirements. It means the process is clearly defined, since the CAB shall assess environmental and socioeconomic aspects during the evaluation for the GHG mitigation activities and deliver the report to BCR, where the technical professionals review the provided information and can request further clarifications or alert about inconsistencies or information presented. Here the expertise of the audit team in the sector in which the Project is located plays an important role. As well, [the BCR Standard](#) highlights that compliance with the national legislation is a general requirement. Therefore, the environmental and social assessment and the indicator for its compliance follow national guidelines/ frameworks considering the types of projects and their set of activities.

The NNH tool also comprises the assessment of the REDD+ Safeguards.

Question 3.10 Sustainable development criteria

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

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

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

- a) Yes, the **Section 17. Sustainable Development Goals of the [BCR Standard](#)**, sets out that projects shall assess their contribution to the SDGs. BioCarbon Registry provides a [SDG toolbox](#) available in the BCR website, that facilitates the recognition from the projects side their contributions. The contribution to SDG’s is as well visible in the BCR [Projects registry platform](#), where exist a column which inform about SDG contribution and specifically mention which of the 17 objectives are being approached by the project’s activities.
- b) Yes, the program considers the contribution to SDG as one of the criteria that VVB shall approach during the process of validation/ verification. This information is described in **section 8. Conformity Assessment bodies**, in the Document BCR [Manual for Validation and Verification of the GHG projects](#). The Organization Briefing document V2, **section 15. Certification and registration**, also refer to review and evaluation of projects, where “*l) Evaluation of compliance with the applicable SDGs*” is approached.

In concordance, the [BCR Standard](#), **Section 2. Monitoring Plan**, sets out the elements under the Monitoring plan that projects shall submit as part of the project documents, being “*(h) The related procedures with the assessment for the project contribution to Sustainable Development Goals, SDG’s*”.

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

N/A

Question 3.11 Avoidance of double counting, issuance and claiming

Does the programme use sustainable development criteria? (<i>Paragraph 2.10</i>)	<input checked="" type="checkbox"/> YES
Does the Programme provide information on how it addresses double counting, issuance and claiming in the context of evolving national and international regimes for carbon markets and emissions trading? (<i>Paragraph 2.11</i>)	<input checked="" type="checkbox"/> YES

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

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

Yes, either the [BCR Standard](#), **Section 17. Sustainable Development Goals** as the Organization Briefing document demonstrate that SDG’s are considered as a fundamental criterion for the process of validation/verification and to proceed to the registry under the BCR platform, which is adapted to reflect the SDG’s contribution in the [Projects registry platform](#) where one column reflects the SDG’s criteria, moreover the summary of projects (access by clicking over the project ID).

Question from initial clarification o5 May 2022

- In relation to question 3.11 on avoidance of double counting, issuance and claiming of the application form, you answered that you provide information on how BCR addresses double counting, issuance and claiming in the context of evolving national and international regimes for carbon markets and emissions trading. However, your summary information in the form does not provide any reference on how you do it. Can you describe how

BCR addresses the possibility of double counting, issuance and claiming? (This question is connected to Paragraph 2.11 in Appendix A “Supplementary Information for Assessment of Emissions Unit Programmes”).

- Section 25 of the BCR standards states that “GHG projects registered in other GHG programs may apply for certification in the BioCarbon Registry, so long as ... the project registration has been withdrawn in the registration system of the standard from which the project comes.” If credits had already been issued and retired/cancelled for the project from the other GHG programme, can they be re-issued under the BioCarbon Registry? Please indicate which BCR procedures would apply under this scenario

Answer: The issuance of VCCs is only possible once the verification process and the subsequent evaluation of the project related documentation by BIOCARBON REGISTRY's technical team are concluded. For this process, the user shall request the issuance of VCCs through the Registry Platform ([See section 5 and section 6 of Handbook of good practices Registry Platform](#)). The number of VCCs issued through the Registry Platform will always be equal to the number of GHG removals or reductions verified by a VVB and approved by BIOCARBON REGISTRY.

The issuance of VCCs is done through the creation of serials (unique serial ID described in section 10 [Handbook of good practices registry Platform](#)). These serials characterize each of the credits, differentiating their destination for VCC actives or VCC reserve AFOLU, their crediting period (year) and their amount per year.

Once the Project is certified and registered, validating the information and carrying a rigorous evaluation process of the verification report, VCCs are issued. BCR makes sure that for each removal of GEI emissions, one unique Verified Carbon Credit is issued.

Likewise, on the BCR Registry platform, the system discounts automatically the VCC withdrawn and only leaves only the remaining VCC active. In this manner, the system ensures that each verified carbon credit is sold only once. Each transaction is public in the registry system, and a withdrawal statement is issued stating the number of VCC withdrawn and their respective serials. In the same manner, each transaction/declaration is recorded in the blockchain, guaranteeing transparency and traceability of the VCC commercialization. If the Registry System is linked to a Registry System other than BCR's, for example, a Market Place, the systems are connected so that when a VCC is traded in the marketplace it is withdrawn (and deducted from the active VCC) in the BCR registration platform. Monthly (starting this month) we send to the National Registry System, a report of the emissions and transactions carried out in our Registry System.

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

a) N/A

b) On the BCR Website there is a section exclusively dedicated to informing about avoid double counting and the measures and procedures in place to manage it in BCR: <https://biocarbonregistry.com/en/double-counting/>

The BCR Standard in section 26 “Double counting” specifies the scenarios in which double counting is understood considering the scope of the Standard. The [Avoiding Double Counting \(ADC\) Tool](#) has been developed in

accordance with BCR program. Section 7 covers the eligibility criteria for the CORSIA emissions unit, where the double issuance, double use and double claiming are described, and Section 8 presents all the information on avoiding double counting.

The project holder shall submit the Host Country Attestation by the designated national authority or designated focal point of the host country of the project activity. The model of this letter is provided in Annex A of the referred document.

The Letter of authorization shall contain, at least:

- (a) The project name and identification number
- (b) Project sector
- (c) Project activity
- (d) Project location (country)
- (e) Project participants
- (f) Emission reductions quantification period
- (g) Details of the signatory of the declaration (name, identification number, position, entity, contact details)

By means of this Host Country Attestation, the focal point shall authorize the project holder and acknowledge that the project activity reduces emissions in the host country. It also recognizes that the BCR Program to which the letter is provided intends to issue VCCs for its emissions reductions.

The focal point also declares that the project is duly registered in the public registry system of our country (link to web address) and, similarly, following the provisions of Article 6.2 of the Paris Agreement, in matters related to compliance with the Nationally Determined Contribution and mitigation purposes, the project holder may, under the provisions of Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) use the VCCs issued by BioCarbon Registry to offset emissions from voluntary buyers of carbon credits, in the international market.

By this declaration, the Government of Country Name confirms that:

1. It has ratified the Paris Agreement on dd/mm/yyyy and has submitted its Nationally Determined Contribution (NDC);
2. The mitigation results outlined in this statement will follow all the considered provisions described in Article 6.2 of Paris Agreement;
3. The entity in charge of climate change management will follow all requirements established by the United Nations Framework Convention regarding the Paris Agreement and other related international agreements.

Authorize the use of the emission reductions, issued as offset credits to project, by user in order to meet offsetting requirements of either CORSIA or article 6.2 or voluntary buyers requiring the corresponding adjustments to be applied by host country;

Declare that the host country will not use the project’s emission reductions to track progress towards, or for demonstrating achievement of its NDC and will account for their use for either international mitigation purposes or other purposes, by applying corresponding adjustments in section B of Annex 1 of COP26 decision /CMA.3 on Article 6.2.

Aspects related to avoidance of double counting, issuance and claiming were reinforced in the [BCR Standard Operating Procedures \(SOP\) document](#) (Sections 14.4 and 14.5) and Website to ensure fully consistent with the EUC and the supplementary guidance provided by ICAO.

PART 4: Carbon Offset Credit Integrity Assessment Criteria

Note—where “evidence” is requested throughout *Part 3* and *Part 4*, the Programme should provide web links to documentation. If that is not possible, then the programme may provide evidence of programme procedures directly in the text boxes provided (by copying/pasting the relevant provisions) and/or by attached supporting documentation, as recommended in “SECTION II: INSTRUCTIONS—*Form Completion*”.

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

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

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

Question 4.1 Are additional

Do the Programme’s carbon offsets... (<i>Paragraph 3.1</i>)	
a) represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate?	<input checked="" type="checkbox"/> YES
b) exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario?	<input checked="" type="checkbox"/> YES

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

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

- a) and b) Yes, [BCR Standard Section 10.6 Additionality](#) applies the definition established by CDM (Adapted from Glossary CDM terms. Version 10.0). In this sense, additionality is the effect of the GHG project activity to reduce anthropogenic GHG emissions below the level that would have occurred in the absence of the GHG project activity. In the AFOLU sector, other than REDD+ projects, additionality is the effect of the project activity to increase actual net GHG removals by sinks above the sum of the changes in carbon stocks in the carbon pools within the project boundary that would have occurred in the absence of project activity. On the other hand, GHG project holders shall demonstrate that emission reductions (or removals) do not correspond to emission reductions attributable to the implementation of legally required actions.

In this way, the additionality assessment includes the evidence that the emission reductions or removals are not results by the regulatory obligation or binding mandate. Considerations of additionality and details on the demonstration of additionality are in each BCR methodological documents available in [BCR website](#). In general terms, the following applies:

For the activities for which BCR has prepared methodological documents, the description in these documents shall be applied. For projects in the energy and waste sectors, the use of the Clean Development Mechanism tool is required. Methodological tool. Tool for the demonstration and assessment of additionality (am-tool-01-v7.0.0.pdf)¹³. Moreover, the Validation and Verification Body (VVB), contracted by the GHG project holder, shall evaluate the documentation and information related to the design of the project and shall determine whether the project holder complies with all the provisions of the [BCR Standard](#), examining, among other aspects, the compliance with the additionality criteria of the GHG project. See [Validation and Verification Manual Section 9. General validation and verification requirements. For REDD+ projects, see the Methodology for Quantification of GHG Emission Reduction from REDD+ projects. Section 9. Identification of the baseline scenario and additionality.](#)

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

Response is divided into a) and b).

- a) Yes, the BCR Program represent greenhouse gas emissions reduction or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate. The additionality assessment includes the evidence that the emission reductions or removals are not results of the regulatory obligation or binding mandate. Considerations of additionality and details on the demonstration of additionality are in each of the BCR methodological documents available on the BCR website.

Even though the aspect is included in the [BCR Standard](#) and assessed in the validation process, in the scope of the BCR Standard (section 5), the text was added as an additional item, “The scope of this standard is limited to : GHG emissions reductions or carbon sequestration or removals that exceed any GHG reduction or removals required by law, regulation, or legally binding mandate”.

¹³ Available in <https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-01-v7.0.0.pdf>

- b) In addition to the response provided in the previous application (a and b), BCR Program now includes a tool related with the demonstration of the project additionality called [Baseline and Additionality](#)¹⁴. Among others, the objective of this tool is to support the orientation to projects developers about the requirements applicable to the GHG projects (already established by the program in section 10.6 of the BCR Standard), to baseline identification and provide the requirements to demonstrate additionality of the mitigation activities and results.

The [BCR Standard](#) was updated to version 3.0 However, the numbering of the sections that are referenced remains the same.

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

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

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

- a) Yes, the BCR rules require additionality and baseline-setting to be assessed by an accredited and independent third-party verification entity. In this sense, BCR Standard applies the following requirement according to Section 22 of [BCR Standard](#):

- Project holders shall ensure that the validation and verification processes are carried out by an accredited and independent third party. They shall confirm that the Conformity Assessment Body (CAB) meets all accreditation requirements with the authorities defined in the requirements of the BCR Standard.
- CABs are responsible for conducting an objective assessment and issuing a validation or verification statement concerning the information submitted to them by the project holder and other criteria defined by the BCR Standard.

The [BCR Standard Section 23. Conformity assessment bodies](#), states that the validation and verification process shall be carried out by a conformity assessment body accredited by:

- (c) an accreditation body that is a signatory member of the International Accreditation Forum (IAF) that has in its portfolio GHG Emissions Verification Body accreditation program under the requirements of ISO 14065; or,
- (d) the Clean Development Mechanism (CDM) or whoever acts in its stead, under the requirements of the UNFCCC for Designated Operational Entity (DOE), as appropriate.

The conformity assessment bodies carrying out validation/verification of GHG projects shall demonstrate the following:

¹⁴ BIOCARBON REGISTRY. 2023. BCR TOOL. BASELINE AND ADDITIONALITY. BCR projects generate verified carbon credits (VCC) that represent emissions reductions, avoidance, or removals that are additional. Version 1.0 February 17, 2023.

- (a) the scope of their certification includes the project activities subject to the validation and verification process;
- (b) it has enough professionals who demonstrate the necessary ethical conduct to perform all the functions required for validation and verification;
- (c) the designated auditors in charge of validations and verifications have experience in the sector and type of the project;
- (d) has documented internal procedures for the performance of its function. Its function's methods include allocation of responsibilities within the organization;
- (e) has the appropriate competence to perform the tasks specified in the legislation in force and the provisions described in this Standard;
- (f) ensures the necessary expertise on environmental issues relevant to the verification of GHG project and quality assurance in a conformity assessment;
- (g) has knowledge of the technical aspects of GHG project and methodologies for quantification and monitoring of GHG emission reductions and removals, including competence to assess baselines and national reference levels, as well as maximum mitigation potentials;
- (h) has procedures for handling complaints, appeals, and disputes.

Furthermore, CABs shall work in an independent, reliable, non-discriminatory, and transparent manner, respecting applicable national legislation and complying with the following requirements:

- (a) have a documented structure, which protects its integrity, with provisions to ensure the impartiality of its operations;
- (b) have appropriate arrangements to safeguard the confidentiality of information obtained from GHG project holders;
- (c) demonstrate that they have no actual or potential conflict of interest with the operators of the GHG project for whose validation or verification they carry out;
- (d) make available to BioCarbon Registry, upon request, information obtained from GHG project holder. Information classified as confidential shall not be disclosed without the written consent of the provider unless required by national legislation;
- (e) provides data used to determine additionality, as defined in this Standard, to select baselines, reference levels, and maximum mitigation potentials, and its use shall not be considered confidential.

CABs shall issue a verification statement, indicating that the GHG emission reductions or removals were generated following the guidelines defined in ISO 14064-2 and the results obtained in the verification carried out under ISO14064-3 or those that adjust and update them.

The GHG conformity assessment bodies shall be accredited by the regulations in force and the [BCR Standard](#) provisions.

Finally, in order to confirm the due accreditation to the CAB. BioCarbon Registry apply a procedure related with an agreement between the CAB and BCR. In this way, the following apply:

“Conformity Assessment Body (CAB) interested in providing their services as CABs for GHG mitigation projects for certifying and issuing Verified Carbon Credits (CCVs) under the BioCarbon Registry Standard (hereinafter the Standard), shall provide this format.

The requirements that CAB must meet to validate and verify projects under the Standard can be found in the Standard documents available on the BioCarbon Registry website (www.biocarbonregistry.com).

Applicants must provide all required information on this form and send it signed to BioCarbon Registry, to email juridica@biocarbonregistry.com, posting as files attached all the requested documentation.

Upon receipt of an application, the BioCarbon Registry team will evaluate the information provided and inform the results of the applicant within 15 working days of receipt of the documentation.

In order to ensure the integrity of the processes and compliance with the requirements of current legislation and the principles of the Standard, BioCarbon Registry reserves the right to reject applications when the capacity and/or competence by the applicant to provide services that meet the requirements of the Standard, and the market are not fully demonstrated or are objected to.

Once the application has been evaluated and approved, the applicant CAB shall submit a signed copy of the Agreement between BioCarbon Registry and the Conformity Assessment Body. Upon receipt of the signed copy of the Agreement, BioCarbon Registry will include the CAB in the list of approved CAB, which is published on the website www.biocarbonregistry.com.” the [Application Form](#) (Conformity Assessment Body – CAB) is available in the BCR website.

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

The BCR Standard was updated to version 3. However, the **section 23 Conformity Assessment** Bodies referred to in the previous application remains the same. The answer provided covers items a) and b).

The main change is related with the validity of an “in-house auditor”. In the former version of the Program, it was possible to certify emissions reductions validated by an “in-house auditor” that the project holder intended to use for the offsetting its own carbon footprint. Considering that this generated confusion regarding third party audits, it has been eliminated from the Program. Now, only independent, third-party audits by accredited auditors are permitted for certification. This update is reflected in section 7. General requirements of the BCR program.

Identify one or more of the methods below that the programme has procedures in place to ensure, and to support activities to analyze and demonstrate, that credited mitigation is additional; which can be applied at the project-and/or programme-level: (*Paragraphs 3.1, and 3.1.2 - 3.1.3*)

- Barrier analysis
- Common practice / market penetration analysis
- Investment, cost, or other financial analysis

- ☒ Performance standards / benchmarks
- ☒ Legal or regulatory additionality analysis (as defined in *Paragraph 3.1*)

Summarize and provide evidence of the policies and procedures referred to in the above list, including describing any/all additionality analyses and test types that are utilized under the programme:

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

The [BCR Standard](#) has been adopted the CDM Tool for demonstration of additionality: **Section 10.6 Additionality**. The CDM Tool includes all the signaled points (Barrier analysis, Common practice, investment, benchmark and legal or regulatory analysis). In the application of the CDM tools, the project holders shall: For AFOLU projects, the additionality demonstration is based on the “*Combined tool to identify the baseline scenario and demonstrate additionality*” (Report EB35, Annex 19). Refers to Methodological Document AFOLU Sector. [Quantification of GHG Emission Reductions or Removals from GHG Projects](#). **Section 11. Identification of the baseline scenario and additionality**.

Section 11.2.2 Additionality analysis: “*Once you have obtained a list of likely land-use alternatives (Section 11.1 above), go to Step 2 (Investment Analysis) or Step 3 (Barrier Analysis), as at least one of these two steps needs to be done to demonstrate the additionality of the Project.*”

STEP 2. Investment analysis

Sub-step 2a. Determine the appropriate analysis method

Sub-step 2b. – Option I. Apply simple cost analysis

Sub-step 2b. – Option II. Investment comparison analysis

Sub-step 2b – Option III. Benchmark analysis

Sub-step 2c. Calculation and comparison of financial indicators (only applicable to options II and III)

Methodological Document AFOLU Sector. Quantification of GHG Emission Reductions. REDD+ Projects. Section 9 (Identification of the baseline scenario and additionality).

STEP 1. Identification of alternative land-use scenarios

STEP 2. Barrier analysis

STEP 3. Impact of the project registration

[AFOLU Methodologies](#) have also included the pertinent section about additionality assessment. Following the above, the CAB must evaluate the results of the additionality analysis and issue a conclusion in this regard. For projects in the energy and waste sectors, the use of the Clean Development Mechanism tool is required. Methodological tool. Tool for the demonstration and assessment of additionality (am-tool-01-v7.0.0.pdf)¹⁵.

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

In addition to the information provided in the first application, the BCR Program now includes a Tool call [Baseline and Additionality](#). Among others, the objective of this Tool is to “establish the requirements applicable to the GHG projects, to baseline identification and provide the requirements to demonstrate additionality of the mitigation

¹⁵ Available in <https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-01-v7.0.0.pdf>

activities and results”.

The main objectives of the [Baseline and Additionality](#) Tool refer to: a) establish the requirements applicable to the GHG projects, to baseline identification; b) provide the requirements to demonstrate additionality of the mitigation activities and results; c) require the necessary conditions to ensure quality in the quantification of the GHG emission reductions; d) support projects conformity within the rules and application procedures for the demonstrate additionality of the GHG projects.

This tool was developed to complement and support the applicability of the guidelines and orientations provided by the BCR program through the BCR Standard (answers referred to section 10.6), moreover reinforcing a set of procedures in place to accomplish provisions linked to additionality.

The BCR tools can be accessed through the BCR website: <https://biocarbonregistry.com/en/tools/>

If the Programme provides for the use of method(s) not listed above, describe the alternative procedures and how they ensure that activities are additional: (*Paragraph 3.1*)

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

N/A

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

N/A

If the programme designates certain activities as automatically additional (e.g., through a “positive list” of eligible project types), does the programme provide clear evidence on how the activity was determined to be additional? (<i>Paragraph 3.1</i>)	<input type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures for determining the automatic additionality of activities, including a) the criteria used to determine additionality and b) their availability to the public:

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

The standard currently does not include positive lists or activities as automatically additional.

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

N/A

Explain how the procedures described under Question 4.1 provide a reasonable assurance that the mitigation would not have occurred in the absence of the offset programme: (*Paragraph 3.1*)

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

The procedures and tools for demonstrating Project Additionality under the BCR Carbon Standard has been structured based on the CDM Tools. The technical committee of BioCarbon Registry evaluated some options and identified the convenience of apply the CDM Tool considering the demonstrated thoroughness and completeness of those method (See Corporative Government v2 section. 5.3). The selected tool is consistent with the best practice, and their use guarantee a reasonable assurance that the mitigation results would not have occurred in the project absence.

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

In addition to the information provided in the previous application, the [Standard Operating Procedures \(SOP\)](#) in Section 19, reinforces the fact that the additionality assessment shall be reviewed and evaluated for the certification and registration, ensuring in this way that it is assessed by an independent, accredited third party auditor (CAB) that the mitigation would not have occurred in the absence of the project activities.

The BCR [Baseline and Additionality](#) tool developed, ratifies that BCR currently does not include positive lists or activities as automatically additional *“BCR Standard does not include activities that are automatically additional. That mean, in BCR Standard are not considered “positive list” of eligible project types”*

Question 4.2 Are based on a realistic and credible baseline

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

Summarize and provide evidence of the policies and procedures referred to in a) and b), including how “*conservativeness*” of baselines and underlying assumptions is defined and ensured:

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

Yes. under the [BCR Standard](#), baseline considerations, project holders must demonstrate that emissions reductions/removals are real, and based on reliable data and parameters. Based on the Principles **Section 7**. In where is described in Conservative attitude (“Use conservative assumptions, values, and procedures to avoid overestimating the emission reductions or the increase of GHG removals”) among others.

The BCR Carbon Standard requires that all projects apply appropriate methodologies. In particular, all methodologies prepared or approved by BCR Technical Committee shall establish the criteria and procedures for identifying credible, alternative baseline scenarios and determining the most plausible scenario.

Section 11.2 Baseline or reference scenario indicates that GHG project holders shall establish a baseline or reference scenario, meaning the situation representing the GHG emissions that would occur in the absence of a

GHG project, they comply with the methodology applicable to the GHG emission reductions or removal activities.

Definition of the reference scenario shall follow the provisions contained in the BioCarbon Registry methodological documents and the other methodologies applicable to projects, in their most recent version and:

- (a) transparently regarding assumptions, methods, parameters, data sources, and factors;
- (b) considering uncertainty and using prudential assumptions;
- (c) specifically, for each GHG project activity;
- (d) considering relevant national as also when applicable to sectoral policies and circumstances;
- (e) maintaining consistency with the emission factors, activity data, projection variables of GHG emissions, and the other parameters used for the construction of the reference scenario;
- (f) implementing procedures to ensure data quality under ISO 14064-2 and the requirements of the selected methodology;
- (g) in such a way that no GHG reductions or removals can obtain, due to decreases in an activity outside the project business;
- (h) covering emissions and removals of all gases, defined in the applied methodologies, included in the project boundary under consideration.

According to **section 11.1 Conservative approach and uncertainty management** ([BCR Standard](#)), GHG project holders should establish and apply mechanisms for managing uncertainty in the baseline quantification and mitigation results. As a good practice, the project holders should use national or local values and data when available. Given this, GHG project holders may use the IPCC default values if and only if local or national data (for the type of Project and parameter required) are not available¹⁶. When using default values, to follow the conservative principle, traditional values of settings should be used¹⁷, for example, by the use of the lower limit of the range of data as long as it corresponds to the most conservative assumption¹⁸.

In AFOLU projects, the baseline identification and the demonstration of additionality include the requirement related to. “The project holder shall demonstrate with reliability that all the assumptions, justifications, and documentation considered are adequate to identify the baseline scenario” (**Section 9. Methodological document REDD+ projects**).

Finally, the baselines and underlying assumptions are publicly disclosed during the public consultation period. Moreover, the Conformity Assessment Body (VVB) shall present an evaluation and conclusion in the validation/verification report see **section 8. Conformity Assessment bodies and section 15. Certification and registration**, in the Document [BCR Manual for Validation and Verification of the GHG projects](#). As well information disclosed on the [BCR Website](#).

¹⁶ GUIDANCE ON IPCC DEFAULT VALUES (Extract of the report of the twenty-fifth meeting of the Executive Board, paragraph 59) “The Board agreed that the IPCC default values should be used only when country or project specific data are not available or difficult to obtain”.
https://cdm.unfccc.int/Reference/Guidclarif/meth/meth_guid16_v01.pdf

¹⁷ The conservative principle for a parameter refers to the value that, when used in calculations, is more likely to result in underestimation rather than overestimation of GHG emission reductions or removals (ISO 14064-2:2019).

¹⁸ The conservative principle shall be ensured by the appropriate choice of parameters affecting the project’s GHG emissions, removals, sinks and reservoirs.

The following question arose in the follow up questions from 26 July 2022:

On page 41 of its application form, BCR states that “the baselines and underlying assumptions are publicly disclosed during the public consultation period.” In its response to the initial clarification question, BCR further states that “BioCarbon Registry doesn’t request a specific template for the project description to be fulfilled. . . . the information provided needs to ensure compliance with all the requirements established by the BCR Standard and methodology according to the applicable sector.” Please indicate where in the BCR Standard it is required that project baselines and underlying assumptions must be publicly disclosed, and what would be the format of this disclosure

During the live Questions that took place in August, the following question was discussed

The Article 6.2 Guidance requires crediting baselines used to quantify ITMOs to be set “below ‘business-as-usual’ emissions projections”. In BCR’s view, does its procedures meet this requirement? If not, has BCR considered whether or how to introduce such procedures? Please explain

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

a) There are no changes in the additionality assessment of the GHG Projects in BCR. However, in order to present more clearly the requirement, a [Baseline And Additionality Tool](#) has been developed to provide a guidance to establish a baseline or reference scenario and the additionality assessment. **Section 6** of the tools sets out that part of the definition of the reference scenario shall follow the provisions contained in the BioCarbon Registry methodological documents and the other methodologies applicable to projects, in their most recent version and:

- (a) transparently regarding assumptions, methods, parameters, data sources, and factors;*
- (b) considering uncertainty and using prudential assumptions;*
- (c) specifically, for each GHG project activity;*
- (d) considering relevant national as also when applicable to sectoral policies and circumstances;*
- (e) maintaining consistency with the emission factors, activity data, projection variables of GHG emissions, and the other parameters used for the construction of the reference scenario;*
- (f) implementing procedures to ensure data quality under ISO 14064-2 and the requirements of the selected methodology;*
- (g) in such a way that no GHG reductions or removals can obtain, due to decreases in an activity outside the project business;*
- (h) covering emissions and removals of all gases, defined in the applied methodologies, included in the project boundary under consideration.*

In response to the live question, BCR clearly states the requirements related to baseline identification and additionality. Thus, project holders applying to be certified and registering with BCR shall demonstrate that their project activities are additional.

In the BCR we understand that we must be clear and compliant in accounting for the transfer of “mitigation outcomes” between countries. This, for instance, is reflected in the identification of the baseline and in the demonstration of additionality of the projects required by the [BCR standard](#) (sections 11 and 11.2 Baseline and

reference scenario).

b) N/A

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

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

Yes, the [BCR Standard](#), has procedures in place to ensure that methods of the baseline scenarios identification (including historical data, methods, parameters, data sources, and factors and using prudential assumptions) do not over-estimate mitigation from an activity. This is particularly described in **Section 11. Quantification and monitoring of GHG emission reductions and removals, section 11.1 Conservative approach and uncertainty management**. GHG project holders should establish and apply mechanisms for managing uncertainty in the baseline quantification and mitigation results; particularly, they shall establish a baseline transparently and prudently. That means that assumptions are explicit, and decisions are informed.

In the case of uncertainties about the values of variables and parameters, establishing a baseline is considered prudent if the resulting baseline projection does not lead to an overestimation of the emission reductions attributable to a GHG project (in case of doubt, use the values that generate a lower baseline projection).

Section 11.2 Baseline or reference Scenario states that the reference scenario shall follow the provisions contained in the BioCarbon Registry [methodological documents](#) and the other methodologies applicable to projects, in their most recent version and: (a) transparently regarding assumptions, methods, parameters, data sources, and factors; (b) considering uncertainty and using prudential assumptions;

Another example, in BCR Methodological document AFOLU- [Quantification of GHG Emission Reductions from GHG projects GHG Removal activities V3.0](#), it is considered that the methodologies used in the quantification of

GHG removals involve different degrees of uncertainty. They originate on the quality and applicability, either of the allometric equations for biomass estimation or of the volume equations that, in conjunction with basic density values and expansion factors, are used to estimate individual trees' biomass.

It is also accepted that, given the nature of projects in the AFOLU sector and their biomass estimation methods, the methods, models, and data used should not generate overestimates.

Accordingly, the purpose of the methodology, the project holders shall consider, when choosing data for the estimation of GHG removals, discount factors related to uncertainty. These discounts should be applied according to the quality and origin of the estimation data applied.

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

Not changes in the guidelines provided in the application submitted in 2022.

As mentioned above, a complementary tool was developed in order to reinforce and complements the provisions and procedures in place regarding conservative baseline estimations was developed, the [Baseline and additionality tool](#).

Are procedures in place for activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration? (<i>Paragraph 3.2.3</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

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

Yes, the renewal of the quantification period requires a reassessment of the baseline scenario, based both on current regulations and on the provisions of the [BCR Standard](#) (See **Annex A. Renewal of quantification period**).

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

N/A

Question 4.3 Are quantified, monitored, reported, and verified

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

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

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

a) Yes, the objectives of the [BCR Standard](#) includes the provision of the necessary conditions to ensure quality in

the quantification and management of the GHG emission reduction and removals. The BCR Standard includes procedures that ensure emissions units are based on accurate measurements and valid quantification methods/protocols. Also, the rules in the standard and methodologies of BCR aims to reduce the uncertainty as much as possible. Specifically (among other requirements), the [BCR Standard](#) in **section 8. Normative References** establishes a crucial condition related with accurate measurements and valid quantification methods/protocols:

The following references are indispensable for the implementation of this Standard:

- ISO 14064-2:2019(es). Greenhouse gases - Specification with guidance, at the project level, for quantifying, monitoring, and reporting the reduction of emissions or the enhancement of removals of greenhouse gases, or that which updates it;
- ISO 14064-3:2019(es). Greenhouse gases - Part 3: Specification with guidance for validation and verification of greenhouse gas declarations, or its amendment;
- ISO 14065:2013(es). Greenhouse gases - Requirements for bodies undertaking validation and verification of greenhouse gases for use in accreditation or other forms of recognition;

BCR requires to apply an eligible BCR methodology. [BCR methodologies](#) set out the procedures for determining the baseline scenario, and the procedures for the monitoring and measurement of the appropriate data and parameters for given project activity, including a full and transparent estimation of uncertainty.

For example, according to BCR Methodological document [Quantification of GHG Emission Reductions from GHG projects GHG Removal activities v3.0 \(Section 15.5\)](#) and [BCR Methodological document Quantification of GHG Emission Reductions REDD+ Projects \(Section 14.6\)](#), the GHG mitigation project holder shall design quality management and assurance system to ensure the proper management, quality, and reliability of the information. The Quality Control/Assurance Control (QA/QC) system should conform to IPCC recommendations. To provide consistency in the processes, protocols and manuals should be developed for all project activities. The QA/QC process, including what is described in the following sections.

In the same way, **Section 21. Monitoring Plan** of [BCR Carbon Standard for Voluntary Market \(BCR Standard\)](#) requires to VVB, the following: *"During the verification process, the project holder shall submit the report under the monitoring plan. Any revisions to the monitoring plan, either to increase its accuracy or information completeness, shall be justified and submitted to the VVB"*.

In Coherence, the [Validation and Verification Manual](#) specifies that: the validation and verification body, contracted by the project holder, shall evaluate the documentation and information related to the GHG project design. Besides, the CAB shall determine whether the project holder complies with all the provisions of the BioCarbon Registry Standard and the others that apply to it, examining, among other aspects, the following:

- (a) GHG mitigation targets and results,
- (b) **the adequate use of an appropriate methodology,**
- (c) **the assessment of uncertainty and conservative approach,**
- (d) the baseline scenario,
- (e) **the project mitigation results,**
- (f) compliance with the additionality criteria of the GHG project,
- (g) ownership and carbon rights,
- (h) assessment of environmental and social aspects,
- (i) criteria and indicators related to co-benefits, if applicable,

- (j) contribution of the project to sustainable development objectives,
- (k) stakeholder's consultation,
- (l) compliance with national legislation,
- (m) conformity of the project with the requirements for grouped projects under the BCR Standard.
- (n) Comprehensive monitoring plan's design for the quantification and follow-up of GHG emission reductions and removals, following the selected methodology.

b) Yes, the BCR Carbon Standard includes procedures that ensure validation occurs prior to or in tandem with verification. These procedures are described as well in the [Validation and Verification Manual Section 9](#), which requires that validation occurs before the first verification or at the same time as the first verification. Specifically, *“validation and first verification may be carried out in a single validation and verification process”*.

c) Yes. The BCR Carbon Standard includes procedures that ensure results of validation and verification are made publicly available. Specifically, **Sections 22.1** and **section 22.2** of the BCR Standard require CABs to submit validation and verification reports. Also, [Validation and Verification Manual Section 9](#) points out that *“As part of the validation and verification processes, the CAB shall:*

(g) present validation and verification reports' information in an objective, neutral and consistent manner and document all assumptions, providing references to the appropriate GHG project's documentation,”

Verification process completed, CAB shall submit the verification statement, ensuring that, during a specified period, the GHG project has achieved the GHG performance. That means GHG emissions, GHG emission reductions, and GHG emissions removal increases, as declared by the project holder.

d) Monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at *specified intervals* throughout the duration of the crediting period? Yes, The start of the validation process should take place in the moments established in [BCR Standard Section 10.4 Start date](#), and verifications can be annual but shall be carried out every three years at most.

Section 9 of BCR [Validation and Verification Manual](#), *“In terms of validation and verification processes, the following general requirements apply to GHG project:*

the start of the validation process for GHG project should take place no later than 5 years after the start date of the project, verifications of GHG project may be annual but should be carried out at least once every 3 years,”

e) Yes. The [BCR Standard](#) includes procedures that ensure mitigation is measured and verified by an accredited and independent third-party verification entity. Specifically, **Section 22** requires that validation and verification processes are carried out by an accredited and independent third party.

Project holders shall ensure that the validation and verification processes are carried out by an accredited and independent third party. They shall confirm that the Conformity Assessment Body (CAB) meets all accreditation requirements with the authorities defined in the requirements of the [BCR Standard](#).

In addition, the [BCR Standard Section 23](#). establishes that:

The validation and verification process shall be carried out by a conformity assessment body accredited by:

- (a) an accreditation body that is a signatory member of the International Accreditation Forum (IAF) that has in its portfolio GHG Emissions Verification Body accreditation program under the requirements of ISO 14065; or,
- (b) the Clean Development Mechanism (CDM) or whoever acts in its stead, under the requirements of the UNFCCC for Designated Operational Entity (DOE), as appropriate.

f) *ex-post* verification of mitigation is required in advance of the issuance of emissions units? Yes. [BCR Standard](#) includes procedures that ensure *ex-post* verification of mitigation is required in advance of the issuance of emissions units (CCV). Specifically, **Section 24 Certification and Registration of Verified Carbon Credits (VCC)** determine that “Carbon credits will only be issued if they have been previously verified, by carrying out the validation and subsequent verification process, in accordance with the guidelines established for this purpose by the ISO 14064-3, or the one that adjusts or updates them, as well as with the definitions of the BCR STANDARD”.

In this sense, BCR requires that verification of the emission reductions and removals that have occurred be conducted by an independent VVB before projects. Also, the conformity assessment body shall carry out the verification under the provisions of the BioCarbon Registry [Validation and Verification Manual](#). The Verification Statement shall include a justification of the conformity of the GHG project's validation, ensuring that it complies with BioCarbon Registry regulations and the applicable national regulations.

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

In addition to the responses to items a) to f), it is worth mentioning that the [BCR MRV](#) assessment process is rigorous and requires a high level of accuracy and strict data collecting and archiving. In consequence, the MRV process for BCR projects shall comply with the BCR Standard and other relevant documents under the BCR Program.

Moreover, the BCR Program now includes a [MRV Tool](#)¹⁹, which establishes the principles and requirements applicable to monitoring, reporting and verification of the GHG projects, and provides the necessary conditions to ensure quality and alignment with guidelines of the quantified, monitored, reported and verified criterion.

It’s important to mention that Validation and Verification reports of GHG projects are part of the public document of projects that can be accessed through the registry platform on the BCR website.

Are provisions in place... (<i>Paragraph 3.3.3</i>)	
a) to manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures, and the programme and the activities it supports?	<input checked="" type="checkbox"/> YES
b) requiring accredited third-party(ies) to disclose whether they or any of their family members are dealing in, promoting, or otherwise have a fiduciary relationship with anyone	<input checked="" type="checkbox"/> YES

¹⁹ BIOCARBON REGISTRY. 2023. BCR TOOL. MONITORING, REPORTING AND VERIFICATION (MRV). BCR carbon credits are quantified, monitored, reported and verified. Version 1.0 February 13, 2023

promoting or dealing in, the offset credits being evaluated?	
c) to address and isolate such conflicts, should they arise?	<input checked="" type="checkbox"/> YES

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

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

a) Yes, the [BCR Standard](#) includes provisions 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. Specifically, as presented above, CAB shall be accredited to ISO 14065 by an approved IAF member or the CDM Accreditation Standard. Both of these norms/standards met requirements for CABs to have in place policies and procedures to assess conflict of interest.

On the other hand, in accordance with **section 23. Conformity Assessment Bodies**, CABs shall work in an independent, reliable, non-discriminatory, and transparent manner, respecting applicable national legislation and complying with (among others) the following requirement: (c) demonstrate that they have no actual or potential conflict of interest with the operators of the GHG project for whose validation or verification they carry out.

In the BCR [Validation and Verification Manual](#), **Section 4**, the rule that applies is the following: According to ISO 14064-3, the principles to be applied in the validation and verification processes are the following:

Independence: Remain independent of the activity being validated or verified and free from bias and conflict of interest. Maintain objectivity throughout the validation or verification to ensure that findings and conclusions are based on objective evidence generated during validation or verification.

Also, in the BCR [Validation and Verification Manual](#), **section 8**, is confirmed the requirement about the prevention of conflict of interest by Conformity Assessment Bodies: The CAB shall demonstrate that they have no actual or potential conflict of interest with the GHG project operators for whose validation or verification they have been engaged.

c) Yes. The [BCR Standard](#) considers this aspect is included in the adequate management of impartiality. The CAB and BCR sign an agreement that contemplates impartiality. Also, in this way, [BCR Validation and Verification Manual Section 23](#) requires that CABs shall have a documented structure, which protects its integrity, with provisions to ensure the impartiality of its operations.

c) Yes, the Conformity Assessment Body shall demonstrate impartiality and independence. The [BCR Standard](#) includes provisions requiring accredited third-party(ies) to isolate such conflicts of interest. This is determined by reference of CDM and the ISO 14065 Accreditation Bodies. In this context, CABs are required to assess conflicts of interest and provide a statement and avoid inadmissible conflicts of interest. In all the cases, those referenced standards (CDM and ISO 1465) include provisions about the treatment of conflicts of interest.

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

As relevant changes, BCR has designed and is implementing the [Code of Ethics](#) in addition to the [Anticorruption Policy](#) that establishes a set of measures to keep guaranteeing impartiality and avoid conflict of interest encompassing CAB's. The agreements signed, between BCR and CABs, include clauses related to the anti-corruption policy and conflict of interest.

The Antibribery Policy of BioCarbon Registry includes issues related to non-conflicts of interest. Those aspects shall be covered by CAB therefore, agreements with CABs **include explicit acceptance of the Antibribery policy and procedures in place** for the identification and management of conflict of interest and other provisions in conformance with the BCR Program.

For the purpose of the BCR Policy, a conflict of interest is a situation where business, financial, family, political work or personal interests come into conflict (or are very likely to conflict) with the judgment of persons in carrying out their duties for BioCarbon Registry. In other words, the person is confronted with choosing between the duties and demands of his/her position and his/her own private interests.

In relation to potential or actual conflict of interest, the following requirements and procedures must be met and followed:

1. Potential conflicts of interest should be identified and declared by the person affected by the potential conflicts to the Compliance Officer at compliance.officer@biocarbonregistry.com or reported by another staff of **BioCarbon Registry** by using the Ethics and Compliance Channel (<https://canaletico.es/en/biocarbonregistry>) as soon as they become aware of such potential conflicts of interest.
2. Such disclosure or report should be made to the Compliance Officer using the Conflict of Interest Declaration Form.
3. The evaluation of a potential conflict of interest must be made by the Compliance Officer.
4. The evaluation carried out by the Compliance Officer may determine the absence of conflict of interest, or it may lead to the conclusion that:
 - The respective person should not go ahead with the evaluated activity; or that.
 - The person should recuse himself/herself from taking part in decision making by **BioCarbon Registry** with reference to the matter in conflict.
5. The Compliance Officer should document the above in the Conflict-of-Interest Disclosure Register and notify the respective person and the direction by e-mail. The program director should acknowledge receipt of the e-mail within three (3) days.

With the aim of preventing conflicts of interest, Section 9 of the Validation and Verification Manual lists the general requirements to be followed by CABs, including:

- in the case that validation and verification are performed at at two different times, the verification may be carried out by the CAB that carried out the validation, provided that the validation or verification team is different from the one that carried out the validation,
- the CAB that did the first verification may do the second verification, provided that the verification team is different from the one that did the first verification, in both auditors and sector experts.
- A different CAB shall carry out the third verification to the one that did the first two verifications, if the same CAB did them.

In addition to the above procedure, all directors and employees of **BioCarbon Registry** shall declare their financial and non-financial interests through the Annual Declaration Form to be filled in every year (in May).

The Direction of **BioCarbon Registry** is responsible for ensuring that **all persons associated with the activities of BioCarbon Registry are made aware of the Policy and Procedures regarding conflict of interest.**

Every person associated with **BioCarbon Registry** must avoid or manage any real or perceived conflict of interest (e.g. by refraining from any decision making or voting on matters subject to a potential conflict of interest), and openly acknowledge any potential or actual conflict of interest which arises through his/her association with **BioCarbon Registry** and communicate same to the Compliance Officer of **BioCarbon Registry** at compliance.officer@biocarbonregistry.com or by using the Ethics and Compliance Channel (<https://canaletico.es/en/biocarbonregistry>).

Moreover, the [Whistleblowing Policy and Internal Investigations Manual](#) provides the guidance of the procedure to follow when a breach is identified, including conflict of interest and unethical behavior.

Are procedures in place requiring that... (<i>Paragraph 3.3.4</i>)	
a) the renewal of any activity at the end of its crediting period includes a reevaluation of its baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario?	<input checked="" type="checkbox"/> YES
b) the same procedures apply to activities that wish to undergo verification but have not done so within the programme’s allowable number of years between verification events?	<input checked="" type="checkbox"/> YES

Summarize and provide evidence of the policies and procedures referred to in a) and b), including identifying the allowable number of years between verification events:

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

- a) Yes, according to [BCR Standard](#), the renewal of any activity at the end of its crediting period (quantification period in BCR) includes a reevaluation of its baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario. Specifically, BCR Standard sets out the requirements with respect to the renewal of the quantification period and what that means for the baseline a project can use going forward. The formal acceptance of the renewal of the quantification period of a registered BCR project, validated by a CAB, so as the allowed continued verification, certification, and issuance of VCC in the new quantification period. The renewal of the quantification period requires a reassessment of the

baseline scenario, based both on current regulations and on the provisions of the [BCR Standard](#).

- b) The program will not accept activities that wish to undergo verification but have not done so within the program’s allowable number of years between verification events .

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

N/A

Are procedures in place to transparently identify units that are issued <i>ex ante</i> and thus ineligible for use in the CORSIA? (<i>Paragraph 3.3.5</i>)	<input type="checkbox"/> YES
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Provide evidence of the policies and procedures referred to above:

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

The BCR Standard does not allow for VCC to be issued ex-ante. The VCC’s are not issued if the verification process has not ended.

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

N/A

Question 4.4 Have a clear and transparent chain of custody

SECTION III, Part 3.4—Identification and tracking includes questions related to this criterion. No additional information is requested here.

Question 4.5 Represent permanent emissions reductions

List all emissions sectors (if possible, activity types) supported by the Programme that present a potential risk of reversal of emissions reductions, avoidance, or carbon sequestration:

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

The AFOLU (Agriculture, Forestry and Other Land Use) projects present a potential risk of reversal of emission reductions. Nevertheless, these risks are addressed per the BCR rules, as presented in the sections below.

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

N/A

What is the minimum scale of reversal for which the Programme provisions or measures require a response?

(Quantify if possible)

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

There is not a minimum scale of reversal for which the BCR Standard provisions. Nevertheless, the [BCR Standard](#) Section 13.1 Reserval Risk Management provides the rules related to the potential reversals. The GHG project holder must demonstrate the actions taken to ensure that the project is maintained over time by including clauses or provisions focused on this objective in the agreements or contracts or by implementing a management plan associated with the risk of reversal.

Nevertheless, the above-mentioned, in any case, for the AFOLU projects, once the GHG emission removals or reductions (estimated based on the selected quantification methodology) have been registered, the system will automatically discount and maintain a reserve of 15% of the total quantified GHG emission reductions or removals for each verified period. This reserve guarantees the replacement of lost credits by occurring events that require the replacement of credits placed in the market. BCR periodically reviews this percentage and, if necessary, adjust it. The 15% discount on Verified Carbon Credits in each verification period is held in a reserve account for the project to which they belong. Moreover, in order to assure all the necessary previsions, the reversal risk management, the CAB shall demonstrate that it has assessed the risks derived from its validation or verification activities. Also, adequate arrangements to cover the responsibilities derived from its activities of validation or verification in the geographic areas it operates.

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

The [BCR Standard](#) establishes that each scale of reversal requires a response.

Section 13.1 of this new version explains that each AFOLU project that registers any GHG emission removal or reduction is subject to 20% of the total quantified GHG emission reductions or removals for each verified period be dedicated to a reserve. This 20% of the total quantified GHG emission reductions or removals is distributed as follows:

- There is a reserve account for the project where 10% of the emission removals or reductions are stored and,
- The remaining 10% will be placed in a General Reserve Account in the BioCarbon Registry

Finally, the last reserve of all projects, at the moment of the process of the last verification, the percentage corresponding to the project reserve will go to a general reserve account called the BCR Reserve. In this account, the VCCs are kept covering potential reversals in any project in the future.

For sectors/activity types identified in the first question in this section, are procedures and measures in place to require and support these activities to...	
a) undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals? (Paragraph 3.5.2)	<input checked="" type="checkbox"/> YES
b) monitor identified risks of reversals? (Paragraph 3.5.3)	<input checked="" type="checkbox"/> YES
c) mitigate identified risks of reversals? (Paragraph 3.5.3)	<input checked="" type="checkbox"/> YES
d) ensure full compensation for material reversals of mitigation issued as emissions units	<input checked="" type="checkbox"/> YES

and used toward offsetting obligations under the CORSIA? (Paragraph 3.5.4)	
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Summarize and provide evidence of the policies and procedures referred to in a) through d):

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

a) undertake a risk assessment that accounts for, *inter alia*, any potential causes, relative scale, and relative likelihood of reversals?

Yes, for AFOLU sector/activity types, are procedures and measures in place to require and support these activities to undertake a risk assessment, monitor identified risk of reversals, mitigate identified risk, and ensure full compensation for material reversals of mitigation issued as VCC.

The [BCR Standard Section 13.1](#) includes definitions and procedures to require the AFOLU projects to undertake a risk assessment that accounts for, *inter alia*, any potential causes, relative scale, and the relative likelihood of reversals. This procedure ensures that the project is maintained over time by including clauses or provisions focused on this objective in the agreements or contracts or by implementing a management plan associated with the risk of reversal.

Additional to the risk assessment, other credible risk management determined in BCR is related to non-permanence. The GHG project holder shall ensure the permanence of the project activities to quantify the GHG reductions or removals, following the conditions set forth by this Standard. The monitoring of project activities, through verifications, shall evaluate the permanence of project activities.

Nevertheless, the above-mentioned, in any case, for the AFOLU projects, once the GHG emission removals or reductions (estimated based on the selected quantification methodology) have been registered, the system will automatically discount and maintain a reserve of 15% of the total quantified GHG emission reductions or removals for each verified period.

In this way, the risk assessment, and the reserve of 15% correspond to a robust mean of addressing reversals for market-based mechanisms such as CORSIA.

b) monitor identified risks of reversals?

Yes, the BCR Standard includes procedures to require and support these activities to monitor identified risks of reversals. **Section 9.2** of the [Validation and Verification Manual](#), defines that under the provisions of ISO 14064-3, the CAB shall consider (among others) the following: a) conformity with applicable verification criteria, including the principles and requirements of BCR Standard in the scope of verification, and b) information and documentation on GHG project planning, including procedures and criteria for the project, baseline, quality control and assurance, risk management, monitoring, and reporting.

c) mitigate identified risks of reversals?

Yes, the [BCR Standard](#) includes procedures to require and support to mitigate identified risks of reversals. It is described in **Section 13**, “*the GHG project holder shall assess the risks related to the implementation of project activities in the environmental, financial and social dimensions*”. It shall be done based on the identification of

risks in these three dimensions. The project holder shall design measures to manage the risks so that the reduction or removal of GHG emissions are maintained during the quantification period of the project.

In this regard, the project holder shall:

- (a) identify the potential natural and anthropogenic risks that GHG mitigation actions may face and determine the measures necessary to mitigate such risks;
- (b) identify potential financial risks related to expected costs and investments, as well as project cash flows and define the necessary measures to mitigate financial risks;
- (c) determine, in the medium and short term, the risks associated with the participation of local communities and stakeholders in the activities proposed by the project holder.

The GHG project holder shall use appropriate methodologies to carry out the assessment of the expected risks (direct and indirect) and consider mitigation measures within the framework of adaptive management.

Adaptive management is a process by which project actions can be adapted to future conditions to ensure the achievement of the proposed objectives. It is a structured decision-making process that considers the impact variables in order to reduce uncertainty about the results.

Finally, and taking into consideration the above, risk assessment and management must be adequate, accurate, and objective.

d) ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA? Yes, the [BCR Standard](#) includes procedures to ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA. Specifically, in the event that a project incurs a reversal (i.e., the net GHG emission reductions/removals are negative for a particular monitoring period), the credits in the reserve will be cancelled.

In the other hand, the [Validation and Verification Manual](#), **section 10.1.3** includes a requirement for Conformity Assessment Bodies in this sense. The CAB shall demonstrate that it has assessed the risks derived from its validation or verification activities. Also, adequate arrangements to cover the responsibilities derived from its activities of validation or verification in the geographic areas it operates.

In this sense, the CAB shall submit proof of having civil liability insurance, as demanded by Decree 1595/15 Article 2.2.1.7.8.6 (Civil liability insurance for Conformity Assessment Bodies. Hence, the CAB shall have civil liability insurance covering responsibility for validation and verification processes under Article 2.2.1.7.8.5²⁰. Such shall have the following features.

- (a) The holder and insured body shall be the Conformity Assessment Body.
- (b) Insurance beneficiaries are users or third parties whose the body causes damage associated with Conformity Assessment Bodies Activity, as described by article 2.2.1.7.8.5;
- (c) the Conformity Assessment Body shall cover the insurance cost, and this cost shall not be transferred to users under any circumstances.

²⁰ Article 2.2.1.7.8.5. Liability of conformity assessment bodies. In accordance with the provisions of Article 73 of Law 1480 of 2011, and without prejudice to the other types of liability, the conformity assessment bodies shall be liable for the assessment services they provide or have recognized within the framework of the conformity assessment certificate or document they have issued or recognized.

- (d) Insurance covering shall include all damages caused by Conformity Assessment Body activity as described by article 2.2.1.7.8.5. Covering shall not be divided according to services provided to different users.
- (e) Exclusions agreed upon the insurance service shall not prejudice its purpose, to protect the professional civil liability of the Conformity Assessment Body;

The insurance duration shall cover the accreditation period of the Conformity Assessment Body.

To demonstrate compliance with the previous requirements, the CAB shall submit to BioCarbon Registry a written communication. This document shall include a certification emitted by the insurance, with information about contracted civil liability insurance.

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

a) undertake a risk assessment that accounts for, *inter alia*, any potential causes, relative scale, and relative likelihood of reversals?

There is not a change in this aspect. However, we confirm that according to the section 11.3 in the BCR Standard, the GHG project holder shall ensure the permanence of the project activities to quantify the GHG reductions or removals, following the conditions set forth by this Standard. The monitoring of project activities, through verifications, shall evaluate the permanence of project activities.

In response to the live question, at BCR we have defined the permanence rules for all projects that are registered under our standard, considering clear and unquestionable procedures. We do not intend to change that in the future. We understand that permanence is a fundamental requirement for verified carbon credits to be "credible", "quantifiable" and "demonstrable" within the framework of the applicable regulations. See Leakage and non-permanence. See BCR Standard, sections 11.3 Leakage and non-permanence.

c) mitigate identified risks of reversals?

In addition to the answer for the prior assessment, the section 13.1 of the BCR Standard details the measures taken to mitigate reversal risks.

Specifically, to the AFOLU projects, once the GHG emissions removals or reductions (estimates based on the selected quantification methodology) have been registered, the system will automatically subtract a reserve of 20% of the total quantified GHG emissions reductions or removals for each verified period.

In all cases, if an event occurs that means loss or decrease of the VCCs issued in the registry platform, the project holder shall inform and provide a report to BCR within a period of no more than one year after the event occurred. Once BCR receives such report and examines the veracity and timeliness of the information, if applicable, it will retire the related amount from the Reserve Account in the registration system and issue a retirement statement, which will be sent to the project holder.

d) ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA? As before, procedures to ensure full compensation for material reversals of mitigation issued as emissions units are detailed in the section 13.1 of new version of the BCR Standard.

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

Summarize and provide evidence of the policies and procedures referred to in a) through c), including indicating the *number of days within which activity proponents must notify the programme of a material reversal event*:

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

a) confer liability on the activity proponent to monitor, mitigate, and respond to reversals in a manner mandated in the programme procedures? Yes, the [BCR Standard](#) includes provisions that confer liability on the activity proponent to monitor, mitigate, and respond to reversals in a manner mandated in the BCR procedures.

Specifically, in order to assuring all the necessary previsions, the reversal risk management, the CAB shall demonstrate that it has assessed the risks derived from its validation or verification activities. Also, adequate arrangements to cover the responsibilities derived from its activities of validation or verification in the geographic areas it operates. In this sense, the CAB shall submit proof of having civil liability insurance. Hence, the CAB shall have civil liability insurance covering responsibility for validation and verification processes. (**Section 13.1 BCR Validation and Verification Manual**).

Also, in [BCR Standard](#) is defined that in any case, for the AFOLU projects, once the GHG emission removals or reductions (estimated based on the selected quantification methodology) have been registered, the system will automatically discount and maintain a reserve of 15% of the total quantified GHG emission reductions or removals for each verified period. See **Section 13 Risk Management**.

b) require activity proponents, upon being made aware of a material reversal event, to notify the programme within a specified number of days? Yes, the project activities proponents shall notify to BCR, in accordance the **section 13.1 Reversal Risk Management** of the [BCR Standard](#) *“In all cases, if an event occurs that means loss or decrease of the CCVs issued and registered in the registry platform, the project holder must inform and provide a report to BioCarbon Registry within a period of no more than one year after the event occurred”*.

c) confer responsibility to the programme to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in the programme procedures? Yes, [BCR Standard](#) includes rules that confer responsibility to the BCR to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in the BCR Standard procedures.

Specifically, the [BCR Standard](#) requires that in all cases, if an event occurs that means loss or decrease of the VCCs issued and registered in the registry platform, the project holder shall inform and provide a report to BIOCARBON REGISTRY within a period of no more than one year after the event occurred. Once BioCarbon Registry receives such a report and examines the veracity and timeliness of the information, if applicable, it will cancel the corresponding amount from the registration system and issue a withdrawal statement, which will be sent to the

project holder. See section 13.

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

General provisions described in section A continues as a requirement for the BCR program. Just an update of a tool called “Leakage, Permanence and Risk Management” was developed to facilitate a deep understanding of the provisions in place to approach risk of reversal and procedures for its communication and mitigation.

This tool is aligned with the general requirements expressed by the BCR Standard. Moreover, this tool includes the rules and requirements for project holders that, in addition to Greenhouse Gas Emissions reduction or removal, take actions to ensure the project benefits are maintained over time. Considering the reversal risk of the carbon capture and storage of the projects under the forestry and land use sector, the project design should include mitigation measures to monitor and compensate for any material incidence of non-permanence. As part of the project certification and registration in the BioCarbon Registry Program, the project holder shall identify the potential reversal risks, propose, and implement mitigation measurements to avoid any carbon release, and follow the BCR rules and requirements to compensate for any reversal generated during the project crediting period.

Does the programme have the capability to ensure that any emissions units which compensate for the material reversal of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA are fully eligible for use under the CORSIA? (Paragraph 3.5.6)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

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

Yes, if necessary, BioCarbon Registry has the capability to ensure that any emissions units which compensate for the material reversal of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA are fully eligible for use under the CORSIA.

The requirements of the BCR Standard and the system by which the registry platform operates make it possible for VCCs that are to be canceled for potential reversals of CORSIA-eligible credits to be selected from the reserve accounts only CORSIA-eligible credits to offset such reversals.

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

According to the rule related with reversals in the BCR Standard (Section 13. Risk management), "the GHG project holder must shall demonstrate the actions taken to ensure that the project is maintained over time, by including clauses or provisions focused on this objective in the agreements or contracts, or by implementing a management plan associated with the risk of reversal."

In this sense, the above-mentioned, in any case, for the AFOLU projects, once the GHG emission removals or reductions (estimated based on the selected quantification methodology) have been registered, the system will

automatically discount and maintain a reserve of 20% of the total quantified GHG emission reductions or removals for each verified period.

This reserve guarantees the replacement of lost credits by occurs events that require the replacement of credits placed in the market. BioCarbon Registry periodically reviews this percentage and, if necessary, adjust it.

Would the programme be willing and able, upon request, to demonstrate that its permanence provisions can fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA? (Paragraph 3.5.7)	<input checked="" type="checkbox"/> YES
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Question 4.6 Assess and mitigate against potential increase in emissions elsewhere

List all emissions sectors (if possible, activity types) supported by the programme that present a potential risk of material emissions leakage:

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

All sectors included in the [BCR Standard](#) (AFOLU, Transport, Energy, and Waste) present a potential risk of material emissions leakage. Nerveless, the BCR Standard have provisions related to the leakages management, including the use of appropriate methodologies that include the evaluation and mitigation of leakages. In this order, is important to note that GHG Projects should use mechanisms for managing the risk of leakage, taking account the established in the methodological documents of BCR Standard.

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

N/A

Are measures in place to assess and mitigate incidences of material leakage of emissions that may result from the implementation of an offset project or programme? (Paragraph 3.6)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

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

Yes, [BCR Standard](#) has measures in place to assess and mitigate incidences of material leakage of emissions that may result from the implementation of an offset project. **Section 21. Monitoring Plan** defines that as part of the project document, project holders shall submit a monitoring plan that contains specification of all potential emissions that occur outside the project boundaries, attributable to the activities of the GHG project (leakage) and description of the methods defined for the periodic calculation of GHG reductions or removals and leakage.

In all cases, where the applied methodology acknowledges leakage relevant risks for the project activity, and dispose of methods for quantifying such leakage, projects are required to follow such methods and deduct from their

accounting emissions any identified leakage, and the project holder shall demonstrate compliance of the requirement.

For example, in the case of REDD+ projects:

Area of a forest²¹ where deforestation or forest degradation activity may be displaced, outside the REDD+ project holder's control. That is, areas to which deforestation or forest degradation agents may be displaced due to project activities.

The leakage area is delimited based on the following criteria:

- (a) all areas in the forest that are a range of mobility of the agents identified in section **;****Error! No se encuentra el origen de la referencia.**²²
- (b) exclude areas of restricted access to agents of deforestation and forest degradation.

For other AFOLU projects (**Section 14.3** [BCR Methodological document AFOLU Removal activities v3.0](#)):

According to AR-ACM0003, for the leakage calculation, it is necessary to apply AR-TOOL15, *A/R Methodological Tool, Version 02.0* (Estimating the increase in GHG emissions attributable to the displacement of pre-project agricultural activities in A/R CDM project activity).

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

There are not changes in rules or procedures related to.

However, in addition to the former documentation of the program, BCR prepared the [MRV Tool](#) where Project holder is responsible for monitoring actual emissions according to applied methodology outlined in the Project Document (PD).

The referred tool establishes (section 9) that the Project holder is responsible for monitoring actual emissions according to applied methodology outlined in the Project Document (PD).

In addition, the monitoring procedures shall supply all relevant information and data, including (inter alia):

- a complete description of the monitoring system, including data collection, procedures;
- parameters used to calculate baseline, project emissions reductions, and leakage as well as other relevant parameters required by the applied methodology and the monitoring plan;

Are provisions in place requiring activities that pose a risk of leakage when implemented at the project level to be implemented at a national level, or on an interim basis on a subnational level, in order to mitigate the risk of leakage? (Paragraph 3.6.2)	<input checked="" type="checkbox"/> YES
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²¹ The forest area shall meet the same eligibility criteria as the project area.

²² The mobility distance of the agents can be determined from secondary studies or from the collection of primary information (participatory rural appraisal).

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

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

[BCR Standard](#) does not include GHG projects (activities) with a possibility to be implemented at a national level, or on an interim basis on a subnational level.

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

N/A

Are procedures in place requiring and supporting activities to monitor identified leakage? (Paragraph 3.6.3)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

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

Yes, BCR Standard account with procedures requiring and supporting activities to monitor identified leakage. As described above, the monitoring plan shall include specification of all potential emissions that occur outside the project boundaries, attributable to the activities of the GHG project (leakage) and a description of the methods defined for the periodic calculation of GHG reductions or removals and leakage. Also, the project holder shall apply an approved methodology that comprises the risk of leakages, the monitoring, and the mitigation in case.

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

There are no changes in the procedures related to. Nevertheless, in addition to the documentation existent in 2022, BCR has been prepared the [MRV Tool](#), which consider more clearly the requirements related to the monitoring of identified leakages.

Are procedures in place requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities? (Paragraph 3.6.4)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

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

Yes, [BCR Standard](#) comprises procedures requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities. Specifically, all GHG projects shall account for material leakage when quantifying GHG emission reductions/removals, as specified in **Section 11.3** of the [BCR Standard](#), **Section 8.3** ([Methodological Document REDD+ Projects](#)), and **section 14.3** ([Methodological Document AFOLU Removal activities](#)).

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

There are no changes in the procedures previously linked in the BCR responses 2022.

As mentioned above, BCR developed a complementary [MRV Tool](#), which clarifies more aspects regarding leakages.

Question 4.7 Are only counted once towards a mitigation obligation

Does the Programme have measures in place for the following...	
a) to ensure the transparent transfer of units between registries; and that only one unit is issued for one tonne of mitigation (Paragraphs 3.7.1 and 3.7.5)	<input checked="" type="checkbox"/> YES
b) to ensure that one unit is issued or transferred to, or owned or cancelled by, only one entity at any given time? (Paragraphs 3.7.2 and 3.7.6)	<input checked="" type="checkbox"/> YES
c) to discourage and prohibit the double-selling of units, which occurs when one or more entities sell the same unit more than once? (Paragraph 3.7.7)	<input checked="" type="checkbox"/> YES
d) to require and demonstrate that host countries of emissions reduction activities 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? (Paragraph 3.7.3)	<input checked="" type="checkbox"/> YES

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

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

a) to ensure the transparent transfer of units between registries; and that only one unit is issued for one tonne of mitigation?

Yes, the [BCR Standard](#) has several measures in place to ensure the transparent transfer of units between registries; and that only one unit is issued for one tonne of mitigation. First, **Section 25** of the [BCR Standard](#) require that GHG emission reductions and removals presented for VCC issuance shall not also in other GHG Program. In this sense, GHG projects registered in other GHG programs may apply for certification and registration in BioCarbon Registry, as long as they comply with the following conditions:

- (a) The project registration has been withdrawn in the registration system of the standard from which the project comes;
- (b) The reductions or removals generated by the project are not part of another registered project, in BIOCARBON REGISTRY or other GHG programs;

For registration and VCC emission, GHG projects shall carry out verification as defined BCR and based on the methodology applicable to the project (if any). The conformity assessment body (or the first party auditor) shall carry out the verification in accordance with the [BCR Validation and Verification Manual](#) and the Verification Opinion shall include a justification on the conformity of the validation of the GHG project, ensuring that it complies with those applicable regulations and the procedures established by BioCarbon Registry.

b) to ensure that one unit is issued or transferred to, or owned or canceled by, only one entity at any given time?

Yes, [BCR Standard](#) are procedures to ensure that one unit is issued or transferred to, or owned or canceled by, only one entity at any given time.

Avoiding double counting at BCR is a mandatory requirement that prohibits the counting, issuance, and claiming of GHG mitigation results in the scenarios at the national and international levels. BCR issue the VCC with a serial number that are generated automatically by the Registration System. The registration platform system ensures that each VCC is represented with a unique serial number. The unique serial numbers generated by the Registration System prevent the same unit from being issued twice and are reconciled to confirm such prevention is effective.

Additionally, the Registry System is an accounting and custody system for the issuance, transfer, and retirement of VCC (Verified Carbon Credits), that ensures none of the possibilities described above take place by using automatized validation criteria.

The Blockchain technology incorporated in the Registration Platform securely stores all issuance and retirement transactions information. This information is immutable. (<https://www.lacchain.net>).

According to the requirements in the [BCR Standard](#) and procedures related to avoiding double accounting, once procedures of Validation and Verification have finished, and after BioCarbon Registry has reviewed all project information complies with BCR Standard and applicable methodology, BioCarbon Registry issue a **GHG Statement**. The numeral C of the Statement declares:

“...c) The project has a positive opinion from the Validation and Verification Body (VVB), informing that the calculation of GHG emission reductions or removals is presented in a pertinent, comprehensive, reliable, comparable, consistent, accurate manner., transparent, conservative, and avoiding double accounting, for the period reported in the verification report....”

c) to discourage and prohibit the double-selling of units, which occurs when one or more entities sell the same unit more than once? Yes, [BCR Standard](#) has rules to discourage and prohibit the double-selling of units, which occurs when one or more entities sell the same unit more than once.

During VCC retirement, a VCC can be retired only once, and a unique destination can be chosen. Specific criteria for each market, this is also validated by the registration system at the retirement moment. Once a VCC is retired, it is automatically discounted and retired from the market.

d) to require and demonstrate that host countries of emissions reduction activities 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? Yes, Once BCR is selected for the Carbon Offsetting and Reduction Scheme for International Aviation, through the [Registration Platform](#), BioCarbon Registry would be willing to consider introducing new procedures to compare national registration systems against the volumes of eligible units issued under the [BCR Standard](#) and used under the CORSIA which the host country’s national reporting focal point or designee otherwise attested to its intention to not double-claim, in accordance with relevant guidelines or requirements set out under CORSIA.

BioCarbon Registry has the capacity to export reports and classify, identify, and quantify units to be compared with international units too. Classification would include a special classification for CORSIA and a check box (for example) attesting to not double claiming.

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

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

Considering the need to clarify this issue, BioCarbon Registry team has prepared the Tool “[Avoiding Double Counting \(ADC\)](#). BCR avoid double counting of emissions reductions. Version 1.0”.

In this document, “BioCarbon Registry (BCR) recognizes that the accounting rules should be robust and transparent. BCR also acknowledges that the emission reductions used by the countries in their achievement of the nationally determined contribution (NDC) is not allowed for another Party to demonstrate achievement of its NDC”. The aims of the tool are:

- (a) establish the principles and requirements applicable to the BCR Program, to avoid double counting of emissions reductions;
- (b) establish requirements for Verified Carbon Credits (VCC) to conform to the requirements of Decision - /CMA.3; Guidance on cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement (referred as Article 6.2 of Paris Agreement)²³;
- (c) provide as well as good practice established under Guidelines Avoiding double-counting under CORSIA²⁴;
- (d) provide the necessary procedures to guarantee that the emissions reductions are only counted once towards a mitigation obligation.

The Tool is intended to be adopted by all users including project holders and Conformity Assessment Bodies and shall be read out and applied in concurrence with the BCR STANDARD and other applicable BCR Program documents.

Does the Programme have procedures in place for the following: (<i>Paragraph 3.7.8</i>)	
a) to obtain, or require activity proponents to obtain and provide to the programme, written attestation from the host country’s national focal point or focal point’s designee?	<input checked="" type="checkbox"/> YES
b) for the attestation(s) to specify, and describe any steps taken, to prevent mitigation associated with units used by operators under CORSIA from also being claimed toward a host country’s national mitigation target(s) / pledge(s)?	<input checked="" type="checkbox"/> YES
c) for Host country attestations to be obtained and made publicly available prior to the use of units from the host country in the CORSIA?	<input checked="" type="checkbox"/> YES

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

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

With respect to Paragraph 3.7.8, BioCarbon Registry would be willing to consider introducing new requirements for proponents to receive relevant attestations from host countries in accordance with relevant guidelines or requirements set out under CORSIA.

The attestation would include all provisions disposed above:

- written attestation from the host country’s national focal point or focal point’s designee
- for the attestation(s) to specify and describe any steps taken, to prevent mitigation associated with units used

²³ https://unfccc.int/sites/default/files/resource/cma3_auv_12a_PA_6.2.pdf

²⁴ <https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/guidelines-for-adc-with-corsia-june-2019.pdf>

by operators under CORSIA from also being claimed toward a host country’s national mitigation target(s) / pledge

- for Host country attestations to be obtained and made publicly available prior to the use of units from the host country in the CORSIA

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

In the section 7 of the Tool “[Avoiding Double Counting \(ADC\)](#)” list the situations that must be avoided to be eligible under CORSIA:

- (a) Double issuance (which occurs if more than one unit is issued for the same emissions or emissions reduction).
- (b) Double use (which occurs when the same issued unit is used twice, for example, if a unit is duplicated in registries).
- (c) Double claiming (which occurs if the same emissions reduction is counted twice by both the buyer and the seller (i.e., counted towards the climate change mitigation effort of both an airline and the host country of the emissions reduction activity). In order to avoid double claiming, eligible programs should require and demonstrate that host countries of emissions reduction activities 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 project holder shall submit the Host Country Attestation to the designated national authority or designated focal point of the host country of the project activity. The model for this letter is provided in Annex A of the document (Tool). The Letter of Authorization shall contain, at least:

- (a) The project name and identification number
- (b) Project sector
- (c) Project activity
- (d) Project location (country)
- (e) Project participants
- (f) Emission reductions quantification period
- (g) Details of the signatory of the declaration (name, identification number, position, entity, contact details)

By means of this Host Country Attestation (which is requested during the project registration by the BCR’s registry system), the focal point shall authorize the project holder and acknowledge that the project activity reduces emissions in the host county. Also, it recognizes that the BCR Program to which the letter is provided intends to issue VCC for their emissions reductions.

Does the Programme have procedures in place requiring... (<i>Paragraph 3.7.9</i>)	
a) that activities take approach(es) described in (any or all of) these sub-paragraphs to prevent double-claiming?	<input checked="" type="checkbox"/> YES
<input checked="" type="checkbox"/> Emissions units are created where mitigation is not also counted toward national target(s) / pledge(s) / mitigation contributions / mitigation commitments. (<i>Paragraph 3.7.9.1</i>)	
<input checked="" type="checkbox"/> Mitigation from emissions units used by operators under the CORSIA is appropriately accounted for by the host country when claiming achievement of its target(s) / pledges(s) /	

mitigation contributions / mitigation commitments, in line with the relevant and applicable international provisions. (Paragraph 3.7.9.2)	
<input checked="" type="checkbox"/> Programme procedures provide for the use of method(s) to avoid double-claiming which are not listed above (Paragraph 3.7.9.3)	
b) that Host Country attestations confirm the use of approach(es) referred to in the list above?	<input checked="" type="checkbox"/> YES

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

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

- a) Projects applying for registration under the BCR Program cannot register in any other register system. The [BCR Standard, section 26. Double counting](#) sets out the principles and practices regarding transparency to avoid double counting. Moreover, specifies the projects shall perform according to the laws applicable.

Statements between BCR and projects states that it has complied with the provisions applicable law they shall reports the requested information on accounting according to the national regulation applicable and procedures established to avoid double-counting. The information to be submitted should contain at least the following: Year of reductions, starting serial of operation, Final Serial of operation, Verified emissions reductions (Ton CO2 e), Retired/canceled Verified emissions reductions (Ton CO2 e), Remanent Verified emissions reductions (Ton CO2 e), Company name in favor of who is retired/cancelled, Purpose of cancelation/retirement, Value Ton CO2 e”

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

As referred in the former application, BioCarbon Registry have procedures in place related with double counting. Those explanations are currently applicable.

However, in addition to the BCR Standard, rules and procedures related with double counting/double claiming, national targets and the Host Country attestation were implemented throughout 2022.

The registry system contains the Host Country Attestation, and the project holders shall give the HCA signed by the pertinent authorized person in the focal point.

In addition to the information presented during the application in 2022, BCR has been prepared the Tool “Avoiding Double Counting (ADC)”, which provides the information on how BCR addresses double-counting, issuance and claiming of the mitigation results.

Does the Programme... (Paragraph 3.7.10)	
a) make publicly available any national government decisions related to accounting for units used in ICAO, including the contents of host country attestations described in paragraph 3.7.8?	<input checked="" type="checkbox"/> YES
b) update information pertaining to host country attestation as often as necessary to avoid double-	<input checked="" type="checkbox"/> YES

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

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

According to the description 3.7.8 (above) BioCarbon Registry would be willing to consider introducing new requirements for proponents to receive relevant attestations from host countries, in accordance with relevant guidelines or conditions set out under CORSIA.

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

BioCarbon Registry has developed new requirements related to Host Country Attestation (See ADC BCR tool referred above).

In the registry, the Host Country Attestation is included, and the HCA is mandatory for projects that request certification and registration with BioCarbon Registry for CORSIA eligibility.

Does the Programme have procedures in place to compare countries’ accounting for emissions units in national emissions reports against the volumes of eligible units issued by the programme and used under the CORSIA which the host country’s national reporting focal point or designee otherwise attested to its intention to not double claim? (Paragraph 3.7.11)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

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

Once BioCarbon Registry is selected for the Carbon Offsetting and Reduction Scheme for International Aviation, through the Registration Platform, BioCarbon Registry can export reports and classify, identify, and quantify units to be compared with international units too. Classification would include a special classification for CORSIA and a check box (for example) attesting to not double claiming.

BioCarbon Registry would be willing to consider introducing new procedures in the registration platform.

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

Tool “[Avoiding Double Counting \(ADC\)](#)” describes the Eligibility Criteria that are used under CORSIA and the Traceability and Custody of VCCs in section 9.1.1.

In addition, section 9.8 of Tool “[Avoiding Double Counting \(ADC\)](#)” describes the requirements to the 9.8 Host Country Attestation which include:

The focal point declares that the project is duly registered in the public registry system of our country (link to web address) and, similarly, following the provisions of Article 6.2 of the Paris Agreement, in matters related to

compliance with the Nationally Determined Contribution and mitigation purposes, the project holder may, under the provisions of Carbon Offsetting and Reduction Scheme for International Aviation (CORZIA) use the VCCs issued by BioCarbon Registry to offset emissions from voluntary buyers of carbon credits, in the international market.

In addition, section 10 establishes that: In all cases, following the requirements of the COP26 decision on Article 6.2 is clear that the host country is liable to ensure that no double claiming is done under NDC for the emission reductions. In this sense, signing the Host Country Attestation for registered projects in BioCarbon Registry the host country shall ensure that no emission reduction from the corresponding monitoring period of project is claimed under NDC.

In consequence, all the reporting requirements (annual and regular) as per Annex to Article 6.2 decision 21 are applicable to the host country, including corresponding adjustments that are additions and subtractions that a country applies to the annual level of the indicator it uses to track progress and achievement of its NDC, e.g., the country’s annual GHG emissions level.

However, in case the BCR Program receives the information about double counting in host country, an appropriate contact at ICAO will be notified.

Does the Programme have procedures in place for the programme, or proponents of the activities it supports, to compensate for, replace, or otherwise reconcile double claimed mitigation associated with units used under the CORSIA which the host country’s national accounting focal point or designee otherwise attested to its intention to not double claim? (<i>Paragraph 3.7.13</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

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

BioCarbon Registry would be willing to consider introducing procedures to compensate for, replace, or otherwise reconcile double claimed mitigation associated with units used under the CORSIA, which the host country’s national accounting focal point or designee otherwise attested to its intention to not double claim.

As evidenced within this application form, BioCarbon Registry has procedures in place to prevent and avoid double claiming at project level.

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

The BCR rules and procedures include now the requirements related to double claim. According the description in [ADC Tool](#), in all cases, following the requirements of the COP26 decision on Article 6.2, it is clear that the host country is liable to ensure that no double claiming is done under the NDC for the emission reductions. In this sense, signing the Host Country Attestation for registered projects in BioCarbon Registry, the host country shall ensure that no emission reduction from the corresponding monitoring period of project is claimed under its NDC.

In consequence, all the reporting requirements (annual and regular) as per of Annex to Article 6.2 decision 21 are applicable to the host country, including corresponding adjustments that are additions and subtractions that a

country applies to the annual level of the indicator it uses to track progress and achievement of its NDC, e.g., the country’s annual GHG emissions level.

<p>Would the Programme be willing and able, upon request, to report to ICAO’s relevant bodies, as requested, performance information related to, <i>inter alia</i>, any material instances of and programme responses to country-level double claiming; the nature of, and any changes to, the the number, scale, and/or scope of host country attestations; any relevant changes to related programme measures? (<i>Paragraph 3.7.12</i>)</p>	<p><input checked="" type="checkbox"/> YES</p>
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Question 4.8 Do no net harm

<p>Are procedures in place to ensure that offset projects do not violate local, state/provincial, national or international regulations or obligations? (<i>Paragraph 3.8</i>)</p>	<p><input checked="" type="checkbox"/> YES</p>
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Summarize and provide evidence of the policies and procedures referred to above:

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

Yes, the [BCR Standard](#) has procedures to ensure that offset projects do not violate local, state/provincial, national, or international regulations or obligations. Specifically, **section 10.7** ([BCR Standard](#)) describes the requirement for the compliance with legislation related to the activities carried out by the GHG project.

In this sense, the project holder shall have a documented procedure, the Documentary Management System. This procedure identifies relevant legislation and regulations access them on an ongoing basis, demonstrating that it has a process for periodically reviewing compliance.

Accordingly, the project holder shall maintain an updated list of all legislative requirements that apply to its GHG project activities.

Besides, in compliance with these documented procedures, the GHG project holder shall²⁵:

- (a) determine and have access to legal and other requirements related to its activities;
- (b) determine how these legal and other requirements applicable to the GHG project;
- (c) take these legal and other requirements into account when establishing, implementing, maintaining, and continuously improving its document management system.

Moreover, in the Tool for demonstration of additionality is included also de assessment about the applicable legislation.

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

The [NNH Tool, “BCR Tool. No Net Harm Environmental and Social Safeguards](#) was developed underpinned in what the program was already requesting as part of the environmental and social assessment as well as safeguards for REDD+ projects (sections 14, 15 and 18 mentioned in postulation 2022 referring to the [BCR Standard](#)).

²⁵ Adapted from ISO 14001. Environmental management systems. Requirements with orientation for their application.

Nevertheless, the NNH tool aims to provide a detailed orientation on how Not Net Harm shall be considered for the project development, the validation and verification process and how those requirements are integrated into the BCR operation and procedures for projects certification and credits issuance.

For instance, regarding environmental assessment the **section 3** of the [NNH tool](#) explains that:

“Without prejudice to the fact that, due to the development of the proposed activities within the context of the project, the project holder is obliged to develop an environmental management plan or that which is contemplated in the legislation of the country in which the project is developed, the project holders must carry out an environmental assessment, analyzing the probable effects on biodiversity and ecosystems within the limits of the project. The analysis must be supported with reliable and recent references”.

Likewise similar provisions are described in the tool for Socioeconomic aspects and Safeguards. Highlighting that: In that case when adverse effects would generate by project’s activities, *“the project holder shall define actions and corrective measures to prevent and when applicable to diminish the social and economic effects derived from the development of the project activities.”.*

The BCR Standard comprises a REDD+ Safeguards (or Cancun Safeguards) interpretation tool for REDD+ project holders to demonstrate compliance with REDD+ safeguards.

In the framework of the new [NNH Tool](#), among other requirements, *“The project holder shall demonstrate that the project activities do not violate local, state/provincial, national or international regulations or obligations”.* Moreover, requirements included in the Anti-bribery policy are aimed at completing the requirements related to no net harm.

Those provisions are requirements for registration and certification of projects at BCR. Therefore CAB’s are called to assess Environmental and socioeconomical aspects, during the Validation and Verification process including [BCR Validation and Verification Manual \(BCR VVM\)](#). Consequently, part of the procedures in place is BCR requests projects to declare **“Do not net harm”** as part of the project documents (Link to template for project Document) to upload at the BCR system; moreover, BCR team crosscheck that those aspects were part of the CABs assessment when validation and verification reports.

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

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

The [BCR Standard](#) includes sections related to environmental and social aspects. The **section 14** corresponds to environmental aspects. The requirement express that *“without prejudice to the fact that, due to the development of the proposed activities within the context of the project, the project holder is obliged to develop an environmental management plan or that which is contemplated in the legislation of the country in which the project is developed, the project holders must carry out an environmental assessment, analyzing the probable effects on biodiversity and ecosystems within the limits of the project. The analysis must be supported with reliable and recent references”.*

Suppose this assessment leads to the conclusion that adverse effects would generate. In that case, the project holder

shall define actions and corrective measures to prevent and when applicable to diminish the environmental effects derived from the development of the GHG project activities. **Section 15** corresponds to the requirement about **socioeconomical aspects**, as:

GHG project holders shall analyze the significant socioeconomic effects of project activities within the project boundaries, clearly explaining the assumptions used and justifying the review results. The assessment shall also refer to related documentation and evidence.

Suppose this assessment leads to the conclusion that adverse effects would generate. In that case, the project holder shall define actions and corrective measures to prevent and when applicable to diminish the social and economic effects derived from the development of the project activities.

The Conformity Assessment Body shall evaluate, in the process of validation and verification, the environmental and socio-economical requirements. The report of validation/verification shall include the complete evaluation and a conclusion about the environmental and socioeconomical aspects effects of the project and the mitigation actions, if applicable.

The [BCR Standard](#) (**Section 18**) includes an assessment of the compliance with the REDD+ Safeguards.

In accordance to that, the BCR Standard comprises a REDD+ Safeguards (or Cancun Safeguards) interpretation tool for REDD+ project holders to demonstrate compliance with REDD+ safeguards.

In this sense, the proposed interpretation must be mandatorily applied by the project holder and the Conformity Assessment Bodies for the implementation, validation and/or verification of REDD+ projects that are structured and developed under the BCR Standard.

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

In addition to the procedures explained before, the new [NNH Tool](#) provides all the requirements related with social and environmental safeguards in its Sections 3.1. and 3.2. Moreover, Sections 14 and 15 of the [BCR Standard](#) regarding environmental and socioeconomic aspects respectively now include an explicit requirement, “The project holder shall demonstrate that the project activities do not cause any net-harm to the environment.”

Coherently with the requirements of Do Not Net Harm and its linkages with Safeguards and SDG’s for instance, are explicit in the BCR guidelines for CABs that informs about the requirements and procedures for validation and verification ([BCR Validation and Verification Manual \(BCR VVM\)](#)).

Describe, and provide evidence of the programme’s public disclosure of, the institutions, processes, and procedures that are used to implement, monitor, and enforce safeguards to identify, assess and manage environmental and social risks: (*Paragraph 3.8*)

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

The [BCR Standard](#) publicly discloses the institutions, processes, and procedures that are used to implement, monitor, and enforce safeguards to identify, assess and manage environmental and social risks. The relevant requirements and rules related to environmental and social management aspects are publicly available in **Sections**

14, 15, and 18 of the [BCR Standard](#). The institutions, processes, and procedures that are used to implement and enforce safeguards are the conformity assessment bodies in the processes of validation and verification. The requirements and procedures for validation and verification are also publicly available in [BCR Validation and Verification Manual \(BCR VVM\)](#). The Validation and Verification process and the results of all project validations and verifications (validation and verification reports) are available publicly on the [BioCarbon Registry Website](#).

Also, as described in **Section 4.8** (above), the relevant policies and procedures for environmental and social safeguards are publicly available. For projects, the safeguards in place include policies and procedures to ensure no net harm, local stakeholder consultation, REDD+ safeguards, and public comment periods.

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

In addition to the procedures explained before, the new BCR Tool [No net harm environmental and social safeguards \(NNH\)](#) provides all the requirements related with public disclosure of, the institutions, processes, and procedures that are used to implement, monitor, and enforce safeguards to identify, assess and manage environmental and social risks.

It’s worth ratifying that Environmental, social, and Safeguard provisions were part of the Program and therefore displayed in the 2022 application. However, the corresponding reference to do not net harm was not explicit. It was an improvement made in the BCR program, ensuring that the guidelines for projects (BCR Standard), the procedures such as the NNH tool and Manual for CAB’s and processes in place are cohesive, coherent, and public disclosure to ensure no violation of applicable law or regulation regarding safeguards.

An update in the Standard refers to the following:

“The project holder shall demonstrate that the project activities do not cause any net-harm to the environment. To support this, the project holder shall apply the BCR Tool. NO NET HARM ENVIRONMENTAL AND SOCIAL SAFEGUARDS (NNH)”.

Some specific provisions encompassed in the NNH tool sets out that:

Specifically, BCR Standard provides requirements that establish safeguards to avoid negative environmental and social effects as described below:

- (a) Project holder shall demonstrate no net harms describing how the project activities impact the environment and the communities and, if apply, how to plan to mitigate any negative environmental and social effects expected to result from their project activity. In this sense, the project holder guaranty does not cause any net harm;*
- (b) The project holder shall submit to the BCR Program the request for certification and registration, following third-party Project Validation and Verification by an approved by BCR Conformity Assessment Body (CAB);*

- (c) Project holder shall, when completing the Monitoring Report, describe how the plan to mitigate negative environmental and social effects, as described in the registered project, has been implemented and how the monitoring of the project activity has been conducted, to demonstrate that the Project Activity does not cause any net harm to the environment or society;*
- (d) The Monitoring Report shall be submitted to the BCR Program along with a request for verification registration and VCC issuance, after CAB by an approved BCR Verifier; and (c) The CAB shall provide a Verification Report and shall determine whether the Project Activity has not caused any net harm to the environment or local community and society in general.*

In the compliance of this tool, the project holder shall provide evidence that:

- (a) The project holder shall demonstrate that the project activities do not violate local, state/provincial, national or international regulations or obligations;*
- (b) Identify environmental and social effects resulting from the implementation of the project;*
- (c) Conduct the assessment and the Risk Management to identify environmental and social effects of the project activities;*
- (d) To develop action plans to reduce or mitigate the effects identified;*
- (e) To provide a support for monitoring the implementation of action plans and accomplishment of action-plan targets; and*
- (f) To facilitate validation and verification by CAB, which aims to certify that Project Activities do not cause any net harm to the environment or to the society.*

Risk management is presented in Section 4 of **the NNH tool** and Section 5 provides guidance on the monitoring plan that shall be designed and present in detail among other elements: *(d) information related to the environmental effects assessment of the GHG project activities and no net harm;*

PART 5: Programme comments

Are there any additional comments the programme wishes to make to support the information provided in this form?
Dear Office of Environmental Protection - ICAO

We are glad to present you the re- application to CORSIA of our program BioCarbon Registry -BCR.

The 2023 BCR re-application reflects the finalization and application of our procedures such as the Anti-bribery policy and its complementary manual and protocols which motivated the updating of documents, manuals, and procedures, including the BCR Standard, in such a way that they reflect provisions of good practices and their respective effective implementation, monitoring, and evaluation.

Underpinned by the existing BCR guidelines that were reflected in the 2022 application, BCR has published a set of complementary tools to provide more details and clarity for users on the existing provisions and procedures to ensure additionality, avoid double counting, manage uncertainty, MRV, no-net-harm provisions, and risk and permanence, as well as in depth explanation of methodological development and approval.

Since our 2022 application, BCR has reinforced design elements of the program that ensure alignment with the integrity of emissions reductions. Also, we recognized the importance of continuous improvement to ensure ours is a solid, secure, agile, technological, and well-structured program for the supply of offset units in the Voluntary Carbon Market and specifically the Aviation sector.

Your comments and question shared during the follow-up discussions to the 2022 application were considered carefully prior to presenting our reapplication. Therefore, we are confident in complying with all the Program Design Elements and believe that our manner of responding will facilitate the process of analysis of the submitted documentation.

During this process, we remain at your complete disposal to receive your feedback, respond, and seek to make BioCarbon Registry credits eligible within CORSIA.

Sincerely,

Team - BioCarbon Registry



ICAO

Programme Re-application Form, Appendix B

Programme Assessment Scope

CONTENTS: List all activities and methodologies/protocols that were assessed by TAB at the time of the previous programme's application or are currently within the Scope of Eligibility in the pilot phase. Programmes may define additional activities and methodologies/protocols programmes for TAB's assessment for the **CORSIA first phase**.

Sheet A) Activities previously assessed by TAB at the time of the previous programme's application or those within the Scope of Eligibility in the pilot phase

Sheet B) List of all methodologies / protocols that support activities described under Sheet A

Sheet C) Activities that were not previously-assessed or excluded for assessment by TAB at the time of the previous application and that programmes wish to add for TAB's assessment for the first phase

Sheet D) List of all methodologies / protocols that support activities described under Sheet C



ICAO

Programme Re-application Form, Appendix C

Programme Exclusions Scope

CONTENTS: List all activities and methodologies/protocols that were excluded from the previous TAB's assessment or outside of Scope of Eligibility in the pilot phase. Programmes may define additional activities and methodologies/protocols programmes to be **excluded** from TAB's assessment for the **CORSIA first phase**. The four sheets are described below:

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

Emissions Unit Programme Registry Attestation

(Version 3, January 2023)

PART A. Applicability and Instructions

1. Relevance and definitions:

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

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

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

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

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

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

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

2. Programme - registry relationship:

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

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

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

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

3.3.1.Forward the signed attestation to the TAB; and

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

PART B: Emissions Unit Programme Registry Attestation

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

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

4.1.1.The instructions and terms of this attestation;

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

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

4.1.4.The terms, conditions and limitations to the Programme’s scope of eligibility and further action(s) requested to the Programme by the ICAO Council, as presented to the Programme upon relevant decision of the ICAO Council on the Programme’s eligibility¹ for the 2024-2026 compliance period (First Phase).

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

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

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

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

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

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

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

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

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

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

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

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


Programme Representative Signature


Registry Representative Signature

ÁNGELA DUQUE VILLEGAS
Programme Representative Name

ÁNGELA DUQUE VILLEGAS
Registry Representative Name

BioCarbon Registry (BCR)
Programme Name

Registration Platform of BioCarbon Registry
Registry Name

March 22, 2023
Date

March 22, 2023
Date

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

ATTACHMENT A: PROGRAMME REGISTRY ATTESTATION DISCLOSURE FORM

PART 1: INSTRUCTIONS FOR REGISTRY REPRESENTATIVE

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

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

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

PART 2: PROGRAMME AND REGISTRY REPRESENTATIVE INFORMATION

1. Programme Representative Information

A. Programme Information

Programme name: [BioCarbon Registry](#)

Administering Organization⁵: [BioCarbon Registry SAS](#)

Official mailing address: [Carrera 7 # 67 – 02 Office 303. Bogotá D.C.](#)

Telephone #: [+57 323 3059939](#)

Official web address: www.biocarbonregistry.com

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

Full name and title: [Angela Duque Villegas, CEO and General Director](#)

Employer / Company (*if not programme*): [N/A](#)

E-mail address: aduke@biocarbonregistry.com Telephone #: [+57 \(310\) 572 7198](#)

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

Full name and title: [Stefanny Diaz Rodriguez, Program Director](#)

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

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

Employer / Company (if not Programme): N/A

E-mail address: sdiaz@biocarbonregistry.com

Telephone #: +905519589209

2. Registry Representative Information⁶

A. Registry Information

Registry / system name: BioCarbon Registry

Administering Organization: BioCarbon Registry

Official mailing address: : Carrera 7 # 67-02 Office 303. Bogotá D.C.

Telephone #: +57 (323) 305 9939

Official web address: www.biocarbonregistry.com

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

Full name and title: BioCarbon Registry

Employer / Company (if not Registry Administering Organization): N/A

E-mail address: adunque@biocarbonregistry.com

Telephone #: +57 (310) 572 7198

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

Full name and title: Stefanny Diaz Rodriguez

Employer / Company (if not Registry Administering Organization): N/A

E-mail address: sdiaz@biocarbonregistry.com Telephone #: +905519589209

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

PART 3: EVIDENCE OF ADHERENCE TO SCOPE OF REGISTRY RESPONSIBILITIES

	<p>Does the Programme Registry fully meet the objectives of any and all Programme provisions and procedures related to the Programme Registry that the Programme is required to have in place in the manner represented by the Programme in the application form that the Programme has provided to the ICAO Secretariat and, if applicable⁷, as acknowledged by the Programme in the signed “Programme acceptance to terms of eligibility for inclusion in the ICAO document “<i>CORSIA Eligible Emissions Units</i>”?”</p>	<p><input checked="" type="checkbox"/> YES</p>
<p>7.1</p>	<p>Describe how the Registry ensures its ability to implement these provisions:</p> <p>As we mentioned in the application 2022, the registration platform of BioCarbon Registry is directly administrated by BioCarbon Registry S.A. Therefore, all provisions described in the “Unit Programme Registry Attestation” and necessary procedures to ensure their compliance can be address effectively by the BCR Registry.</p> <p>BioCarbon Registry is eager to:</p> <ul style="list-style-type: none"> -Communicate/ notify to ICAO effectively any change update in materials of the program registry. -Respect the provision of communication between ICAO and the program registry. - Assume the responsibilities under CORSIA considering that nowadays the operation of the registry demonstrates a full traceability of Verified Carbon Credits and coherence with the procedure for CORSIA Eligible Emission Units describe in the attestation for the Programme Registry’s. Public information regarding status of Units and cancellation/retirement of Units are functionalities in place in the BCR Registry system website. -Upon request of the CORSIA participant account holder, BCR will provide information and reports requested and facilitate the reinforcement of nowadays procedures to facilitate the communication and analysis of BCR data by CORSIA. <p>The registration platform was designed by BioCarbon Registry, considering all requirements described in the BioCarbon Registry Carbon Standard and governance documents presented in the Application Form. Currently, the registration platform meets all objectives and provisions required by the program described in the application form.</p> <p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> <p>The BCR Registration platform is directly accessed from the BioCarbon website: www.biocarbonregistry.com Only the administrator and account holders have access by clicking “Log in” in the upper part right. Access to the registration platform and illustration which shows step by step registry functionalities.</p> <p>https://app.biocarbonregistry.com/register/en</p>	

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

Full Name

Language

English

E-mail

Password

Your password must be at-least 8 characters long, should contain 1 Uppercase, 1 Lowercase, 1 Numeric and 1 special character.

Confirm password

I accept terms and conditions

I consent to the processing of personal data

I agree with the anti-bribery policy

I'm not a robot

reCAPTCHA
Privacy - Terms

Registry

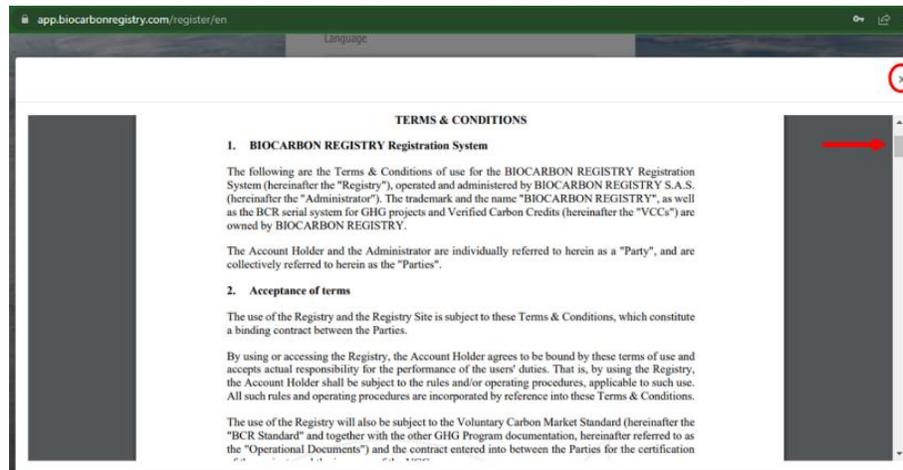
[¿Already have an account? Log in](#)

During the process of opening account, the user will find:

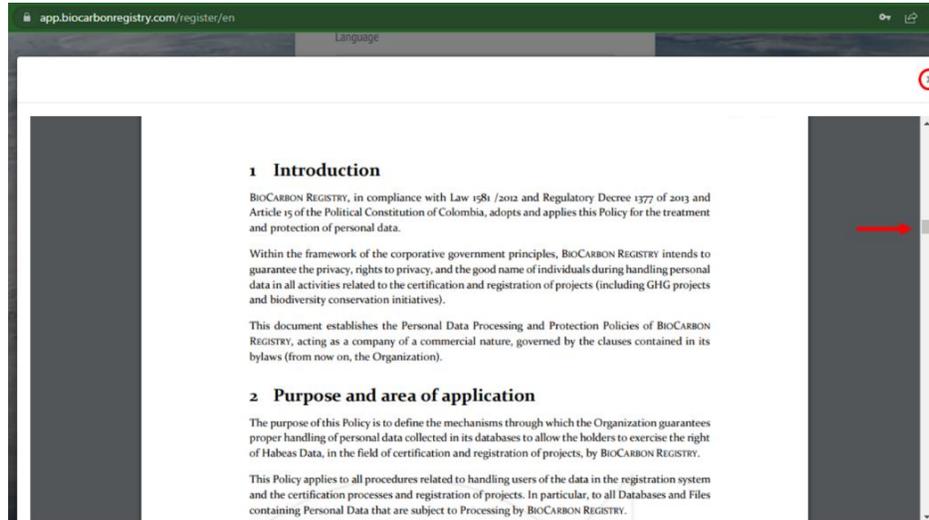
- BCR terms and conditions
- Processing personal data
- Antibribery policy of BCR

Each selection has itself a link to the corresponding full document thus, clients have access to guidelines and rules of the BCR operation and registry procedures in place. By clicking the checkbox on the left side, the client accepts, consent and agree those.

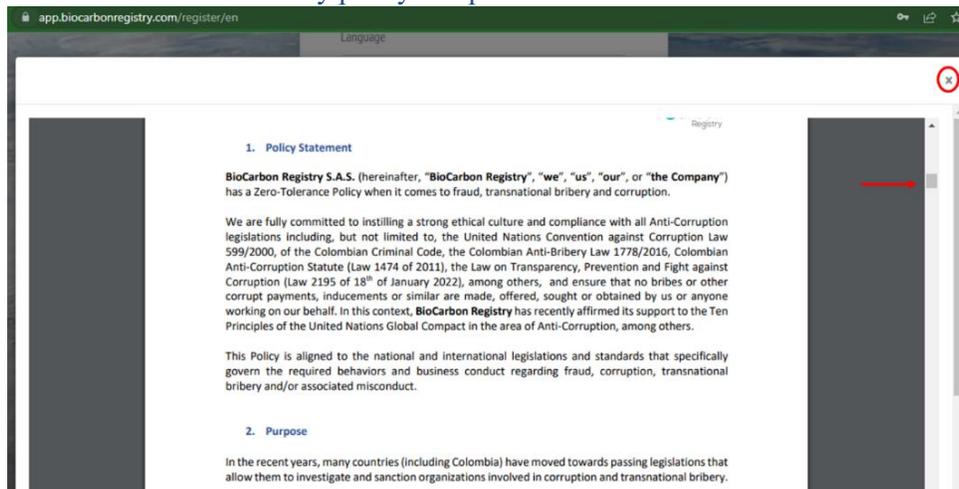
View “Terms and conditions” full document access.



View “Policies of Treatment and Protection of Personal Data” full document access.



View “anti-bribery policy and procedures” full document access.



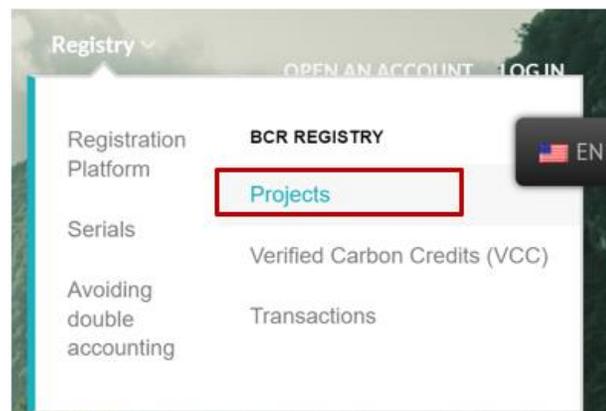
The Attachment to this *Emissions Unit Programme Registry Attestation* includes snapshots of the interfaces for both the users and the administrator, illustrating the registration platform functionalities and public Registry, as evidence. The public Registry is automatically fed from the information registered through the registration platform only when the platform administrator has **reviewed and approved** a registration request through their administrator account. The procedures that require approval by the administrator through the platform are:

- User registration
- Project registration
- Verification period registration
- VCC emission
- VCC transfers
- VCC retirements

The public Registry is accessible through:

Information of registry characteristics: <https://biocarbonregistry.com/en/registration-plataform/>

BCR provides details of measures taken to avoid double counting: <https://biocarbonregistry.com/en/double-counting/>



Access to projects and its status:

<https://biocarbonregistry.com/en/projects/>

By accessing through “Projects” public has direct view of Registry of projects, including validation and verification reports, SDG’s linked to project activities, summary of the project, Project Document, project quantification period and Verified Carbon Credits for crediting period.

In this section it is possible to identify the project status: In process or registered. In process are the projects that pre-register the project however the validation report is not yet available to proceed with the formal registration and certification.

Access to VCC available from registered projects at BCR:

<https://biocarbonregistry.com/en/carbon-credits/>

Access to information of transactions/retirement:
<https://biocarbonregistry.com/en/transactions/>

This evidence is also included in the attachment to this *Emissions Unit Programme Registry Attestation*. The Registration Platform is governed by SOP *document and the [BCR handbook and good practices registry platform](#)*.

Will the Programme Registry ensure that a CORSIA participant’s request for a registry account will not be denied solely based on the country in which the requestor is headquartered or based? YES

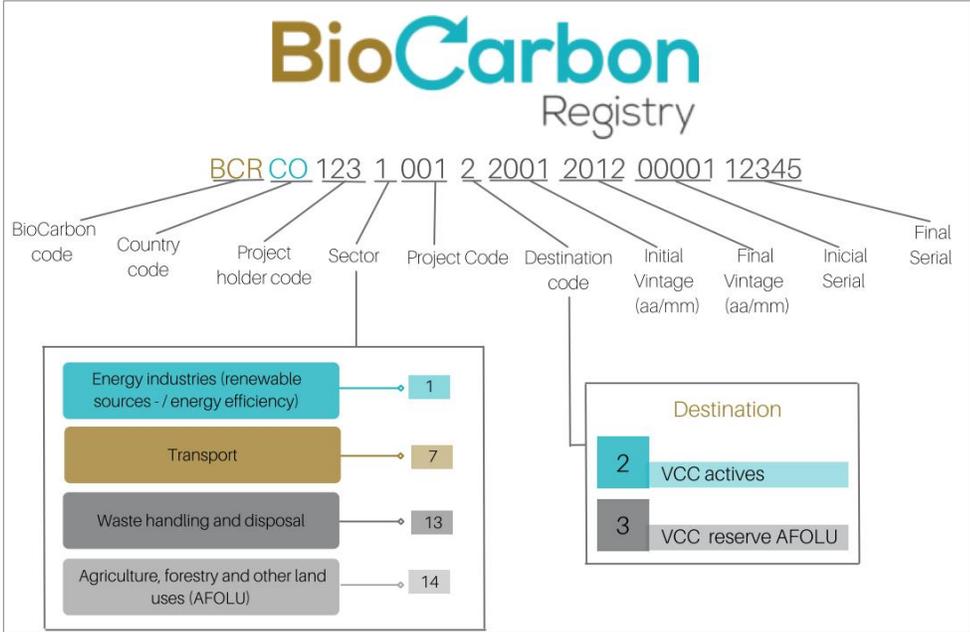
Describe how the Registry does or will implement this provision:

The Registration Platform does not discriminate any project holder based on its country of origin and is therefore designed to create new accounts all over the globe. The system can register projects developed in any country, dependent territories, and special areas of geographical interest listed in the ISO 3166-1 (Codes for the representation of names of countries and their subdivisions – Part 1: Country codes). The CORSIA participant will be assigned an identification that includes the corresponding country's code, following codes defined by the ISO 3166-1.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

The [BCR handbook and good practices registry platform](#), section 10.0 Serial information, and the web page discloses the Serial ID references, where the three first codes correspond to the User ID, including the country code, as follows:

7.2



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7.3	<p>Will the Programme Registry (in the case of applicants to be assessed to determine their eligibility)/Does the Programme Registry (when the Programme is determined to be eligible by a decision of the ICAO Council) identify / label its CORSIA eligible emissions units as defined in the ICAO Document “<i>CORSIA Eligible Emissions Units</i>”?</p>	<input checked="" type="checkbox"/> YES
	<p>Describe how the Registry does or will implements this provision:</p>	
	<p>Since BioCarbon Registry directly manages the BCR registry platform, it has the capability to adapt how the information is displayed and categorized to identify the ICAO- eligible emission units. A new column will be added under the title “additional certifications”, where CORSIA/ICAO can be displayed and easily identified by the public. The adjustment is considered in the “BCR handbook and good practices registry platform.” document, section 7. VCC Additional characteristics.</p>	
	<p>This adjustment has been already displayed in the test environment.</p>	
	<p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p>	
<p>The image below displays the main menu of a general account. Functionality number 4 will allow tracking received and sent VCC transfers. Received VCC transfers can be used to retire/cancel VCC.</p> <p>Also, through functionality 2. Projects registry, the account holder can retire/cancel VCC from its registered own projects. Functionality 4. VCC retirement/cancellation registry will allow to the participant to track all retirements and cancellations he has made.</p>		

All the procedures in place aligned to best practices are described in the BCR [handbook and good practices registry platform](#), which is available for projects registered on BCR.

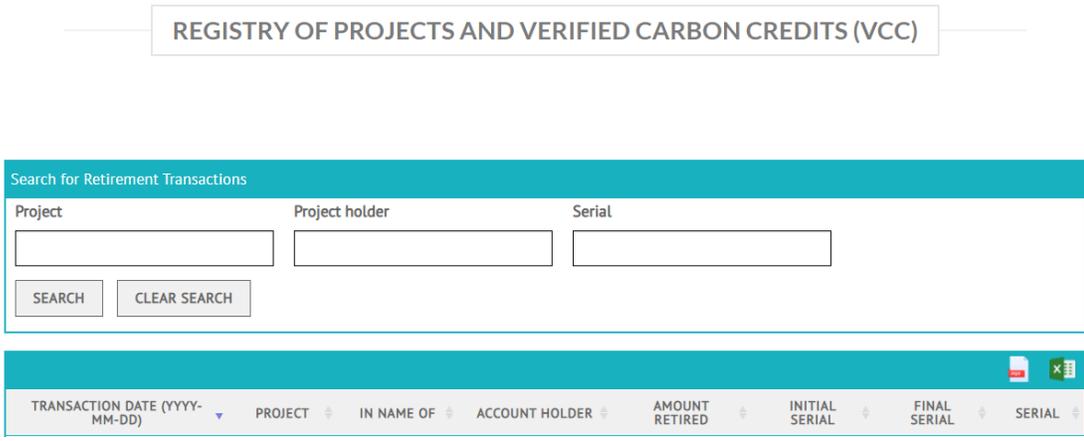
The attachment to this *Emissions Unit Programme Registry Attestation* includes more snapshots of how the user will experience a retirement through the Registration Platform of BioCarbon Registry.

Link folder with additional information: https://drive.google.com/drive/folders/1L265oaL-ZzaFuPtZN4RekIqKB911R4cM?usp=share_link

	<p>Will the Programme Registry, upon request of the CORSIA participant account holder or participant’s designee, designate the participant’s cancellation of emissions units for the purpose of reconciling offsetting requirements under the CORSIA, including by compliance cycle?</p>	<input checked="" type="checkbox"/> YES
<p>7.4</p>	<p>Describe how the Registry does or will implement these provisions:</p> <p>The CORSIA participant account holder will be able to retire VCC by holding a general account or an Aggregator account:</p> <ul style="list-style-type: none"> - <u>The General Account Holder</u> is a user who may be the owner of a project but may also have subaccounts, i.e. register the projects of other project owners (third parties). Holding a general account, the user will be able to receive/transfer VCC from/to other accounts and retire VCC from its registered projects and from received VCC. <u>The Aggregator Account Holder</u> is a user who cannot register projects. This type of user may only receive transfers from other users and may retire/cancel VCCs. <p>Retirements will be possible if the account holder has available VCC in its account from its projects or from received transfers.</p>	

	<p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p> <hr/> <p>The public Registry is automatically fed from the information registered through the registration platform, only when the platform administrator has reviewed and approved a registration request through their administrator account. The procedures that require approval by the administrator, through the platform are:</p> <ul style="list-style-type: none"> • User registration • Project registration • Verification period registration • VCC emission • VCC retirements <p>When a retirement request is submitted by a user, the administrator receive an email notification. 5 calendar days are the maximum timeline to respond to the request. BioCarbon Registry is able to reduce the time of response to three days for CORSIA.</p> <p>When the retirement is accepted by the administrator, it is automatically/immediately disclosed in the public Registry.</p> <p>The public Registry is accessible through: www.biocarbonregistry.com.</p> <p>The disclosed information regarding retirements include:</p> <ul style="list-style-type: none"> • Date of retirement • Name of the Project • Name of the Account holder achieving the retirement • Detailed legal Id number (NIT) • Name of the final user (airplane operator in the case of CORSIA) • Detailed legal Id number (NIT) (airplane operator ID in the host country, in the case of CORSIA) • Total quantity of VCC retired. • Start of serial number • End of serial number • Complete serial number <p>The serial number also provide intrinsic information:</p> <ul style="list-style-type: none"> • Country • Unit Type (sector, destination) • Verification period (vintage) of the units • Project ID (further information is available in the web page by knowing the project ID as Project owner, methodology, Verification and validation body, verification reports, location and images of the project, Project contact information • Quantity of available VCC vs Retired VCC form the serial.
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7.5	a. Will the Programme Registry, within 1 – 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of	<input checked="" type="checkbox"/> YES
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	<p>holding and cancelling CORSIA Eligible Emission Units within the registry and barring system downtime that is scheduled in advance or beyond the control of the registry administrator, make visible on the Programme Registry’s public website the account owner’s cancellations of CORSIA Eligible Emission Units as instructed.</p>	
	<p>b. Will such cancellation information (row a) include all fields that are specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV?</p>	<p><input checked="" type="checkbox"/> YES</p>
<p>Describe how the Registry does or will implement these provisions:</p>		
<p>Once a retirement is made in the system, the CORSIA participant account holder will receive to the registered e-mail a unique and secure Retirement Statement, including all relevant information. The document is also available in the user interface of the registration platform as well it is available the certificate emitted by Blockchain.</p> <p>Also, through the public Registry, the user may download reports in .pdf and .xlsx formats. The report can be selected according to filters or specific searches. The searching system on the left and top side of each table of the public Registry makes easy to find a specific record that user wants to access. Tables of public Registry can be organized by date or alphabetical order using the arrows in the title of each column in the table.</p>		
<p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p>		
<p>The following image demonstrate information about reports exported through the web page of BioCarbon Registry (Public Registry) in a .xlsx or PDF report from the public Registry: https://biocarbonregistry.com/en/transactions/</p>  <p>Specific rules, procedures and best practices are described in the BCR Handbook and good practices registry platform, Section 9.0.</p>		

<p>7.6</p>	<p>Will the Programme Registry, upon request of the CORSIA participant account holder or participant’s designee, generate report(s) containing the information specified for this purpose in Annex 16, Volume IV, and ETM, Volume IV?</p>	<p><input checked="" type="checkbox"/> YES</p>
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Describe how the Registry does or will implement this provision:
<p>The BCR Registry System ensure the authenticated and secure access to the registry data of CORSIA participant account holders or persons designees by the account holder. The system is self-managed, and the information related to transactions conducted by the user are available and disclose, including documentation related.</p> <p>The authorized user has the options for generate report (s) containing the information specified for the purpose of compliance with the CORSIA requirements (regarding Annex 16, Volume IV, and ETM, Volume IV).</p> <p>Considering the system security, is important to confirm that the BCR Registration Platform has been developed with international secure code policies. The specific provisions about that are described in the BCR Handbook and Good Practices Registry Platform. In the same way, the registry platform’s security and information about security systems is disclosed in the Standard Operating Procedures V.1.0.</p>
In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .
The BCR handbook and good practices registry platform .

7.7	a. Does the Programme Registry maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants’ designees, and transaction events carried out by a user?	<input checked="" type="checkbox"/> YES
	b. Does the Programme Registry disclose documentation of such practices (row a) upon request?	<input checked="" type="checkbox"/> YES
	c. Does the Programme Registry utilize appropriate method(s) to authenticate the identity of each user accessing an account?	<input checked="" type="checkbox"/> YES
	d. Does the Programme Registry grant each user access only to the information and functions that a user is entitled to?	<input checked="" type="checkbox"/> YES
	e. Does the Programme Registry utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user?	<input checked="" type="checkbox"/> YES
	f. Do such security features (rows a – e) meet and undergo periodic updates in accordance with industry best practice?	<input checked="" type="checkbox"/> YES
	Describe how the Registry implements each provision in rows a – f:	
<p>The BCR Registration Platform was developed with secure code policies consider. The specific provisions are described in the BCR handbook and good practices registry platform, <i>section 11. Registry platform’s security</i> and information about security systems is disclosed in the Standard Operating Procedures V.1.0.</p>		

The BCR's Registry system has a secure access system since, from the moment of opening an account, the following security parameters are followed:

- Data encryption via SSL certificate between our servers and the website
- HTTPS protocol used for Blockchain API calls
- Vultr data centers are used to ensure good physical security of our data.
- Data that is not stored on the Blockchain is located on Vultr's certified and secure servers
- Our IaaS (Infrastructure as a Service) provider ensures that servers are fully up-to-date and with the latest security patches, using secure operating systems on all our Unix-based servers
- Any transaction made by an account is fully auditable through our Blockchain and can be viewed in our Transaction Monitoring tool.
- Our IaaS provider guarantees the use of firewalls to defend our servers from intrusion.
- Server-side privacy rules to ensure user authentication, (before accessing data), to manage the data that users can access. Personal or sensitive data can only be accessed by the owner thereof and only when logged in.
- Our IaaS provider uses vulnerability monitoring tools to detect potential vulnerabilities in our infrastructure. Additionally, we have vulnerability scanning software on our web assets: Acunetix
- Vultr as our IaaS provider, is constantly working with security researchers to identify and resolve vulnerabilities in the system
- Before any development work, first it is uploaded to a test environment in search of vulnerabilities and after being sure to comply with all security parameters it goes to production
- IP block for failed attempts through DDoS mitigation service that offers protection against layer 3 and layer 4 network attacks
- Two-factor authentication to ensure secure entry to the platform
- Account is blocked for one hour, for failed login attempts (up to 3 attempts)
- Log of auditable activities
- Integration with service providers, such as Stamping for blockchain traceability
- Email identity verification
- Strong password creation that must include a minimum of characters, uppercase, numbers, and symbols.
- At the time of entry to the platform, double factor verification is done (the system sends a code to the registered email to be able to enter)

Additionally, and in order to guarantee the security of the information contained in our web assets, we have the Acunetix vulnerability scanning application, which use Interactive Application Security Tests (IAST) through technologies such as: DeepScan, SmartScan, AcuMonitor and AcuSensor, and continuous integration systems: Teamcity, Bamboo, Azure DevOps and GitLab.

b) General information regarding cyber security is describe on the BCR website: <https://biocarbonregistry.com/en/registration-plataform/> and specifies about the existence of the BCR Handbook of Good practices registry platform, document that is provided automatically to users of the BCR platform system.

c) Before gaining access to the Registration system, users must register for an account. During the creation of account holders, the system provides the information to the client with the types of accounts available and the accesses that each one has. The BioCarbon Registry team performs validations on each new account. We also carry out continuous monitoring of the transactions carried out by our clients, to verify that good practices are being complied with. In addition, The software considers the security of the Registry through the following components:

- SSL certificate (domain verification): the information is encrypted and protected.

- ReCaptcha of Google: protects the site from *spam* and misuse. It identifies when a human or a Bot access attacking and/or blocking the program.
- Identity validation through email verification.
- Identity validation through token code
- Secure password: for a user to create his password, the system forces him to enter a secure password that cannot be detected by strangers (minimum number of characters, numbers and symbols).
- Internal control of access to the platform: functionality to block users after 5 unsuccessful login attempts.
- Development based on secure code programming and OWASP policies⁸: latest stable version and verified *laravel framework* for based-development programming.
- Server provider: the platform is developed in VULTR, a recognized server provider with high security standards.
- Automatic *backup*: Programming of 3 daily *backups* of automatic database that provide information reliability and traceability.
- Preventive and corrective maintenance of cyber threats: prevention of unauthorized entry to the website as *plugins* and code (*hacking*), elimination of recurrent *hacking*, and prevention of modification of site content. Maintenance also includes **review** of the operating system configurations, Apache and PHP, **scanning of vulnerabilities**, **analysis** of security into all sites (*Blackbox*, *Greybox*, *Whitebox*), **detection** and identification of malware present on the server, **implementation** of recommendations and server configuration settings, and site remediation.

d) User authentication is carried out on the server side, using privacy rules to manage the data that users have access to. Personal or sensitive data can only be accessed by the owner thereof and only when logged in. When the titular users are registered, the type of account must be chosen, the registration system guarantees that each type of account has the specific permissions and access to information and functions unique to each type. Additionally, the system administrator can restrict permissions to users. Any data that does not include confidential or personal data can be accessed publicly.

e) All possible event related to BCR registry system (request the registration of account project holders, register projects, issue of Verified Carbon Credits-VCC, transfers and withdrawals/retirements), must be confirmed by the user by checking a checkbox to complete the action. Once the transaction is completed, the system sends a notification to the registered email. For VCC transactions, the user can also verify the Blockchain information (Checking the registration in LACChain and Stamping).

f) Security features are reviewed monthly to ensure they are in line with industry best practices. Monitors are made through cybersecurity software (vulnerability scanning through Acunetix), of all the web assets of the company, so that, through the development team, they are kept updated and complying with the security policies established within the registration system.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

Details of cyber security provisions are described in the [BCR handbook and good practices registry platform](#) Section 11. Registry platform's security. Periodically updates are taking place in the system being minimum requirement 1 each 3 months.

⁸ Open Web Application Security Project

7.8	a. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant’s designee, notify the CORSIA participant account holder or their designee?	<input checked="" type="checkbox"/> YES
	b. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant’s designee, notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme’s application form?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement each provision in rows a and b:	
	<p>a) BCR’s principles which are reflected in the BCR Registry operation, are based on responsibility and quality. BCR works continuously on all necessary provisions to provide users a secure registry System. In case any breach of Registry is identified, the Registration Platform administrator emit a notification to BCR’s administrator.</p> <p>BCR has in place periodicals preventive and corrective maintenance of cyber threats: prevention of unauthorized entry to the website as <i>plugins</i> and code (<i>hacking</i>), elimination of recurrent <i>hacking</i>, and prevention of modification of site content. Maintenance also includes review of the operating system configurations, Apache and PHP, scanning of vulnerabilities, analysis of security into all sites (<i>Blackbox</i>, <i>Greybox</i>, <i>Whitebox</i>), detection and identification of malware present on the server, implementation of recommendations and server configuration settings, and site remediation.</p> <p>Nevertheless, if a case of any breach of data security the BCR’s administrator is authorized to temporary block any account that can be under secure risk, until the team for registry security evaluate the situation and proceed according with what is need it. The Registration Platform administrator will notify CORSIA and will keep the user informed about any action required and about the development of the incident. Additionally, BCR offers a hotline to resolve doubts and concerns of the users of the registration platform.</p> <p>b) A formal communication channel will be established with the ICAO Secretariat to effectively execute procedures for notification upon any breach of Programme Registry data.</p>	
	In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i> .	
	<p>BCR handbook and good practices registry platform</p> <p>See more information in the Annex D1- Attached to this format.</p>	

7.9	Does the Programme Registry ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV, and ETM, Volume IV ⁹ ?	<input checked="" type="checkbox"/> YES
	Describe how the Registry implements these provisions:	

⁹ Without prejudice to the aforementioned, such requirement would not prevent a Programme Registry from utilizing secure, time-bound and auditable methods for correcting unintentional user-entry errors.

	<p>When an account holder requests for a retirement transaction, they must specify the purpose of the units (destination). Currently two destinations are available. BCR administrator will include new destinations according to the Carbon Standards and eligibility of its units (i.e. CORSIA units).</p> <p>If a VCC (or unit) is eligible for the national compliance or voluntary market, it will be able to be retired only for that purpose; otherwise, the registration platform will not allow the retirement. Once a retirement is accepted by the administrator, neither the administrator nor the user can delete the transaction.</p> <p>The retirement of units is a non- reversible operation supported by the blockchain technology independent of the destination or use. In this way the irreversibility of the process is guaranteed.</p>
	<p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry’s implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p>
	<p>Procedures in place are described in the BCR handbook and good practices registry platform</p> <p>The public access to the information of VCC and its status from projects can be consulted: https://biocarbonregistry.com/en/carbon-credits/</p> <p>Also information about retirements is accessible through the website: https://biocarbonregistry.com/en/transactions/</p>

7.10	a. Does the Programme Registry ensure that all cancellation information on its website is presented in a user-friendly format?	☒ YES
	b. Does the Programme Registry ensure that all cancellation information on its website is available at no cost and with no credentials required?	☒ YES
	c. Does the Programme Registry ensure that all cancellation information on its website is capable of being searched based on data fields?	☒ YES
	d. Does the Programme Registry ensure that all cancellation information on its website can be downloaded in a machine-readable format, e.g., .xlsx?	☒ YES
	Describe how the Registry implements each provision in rows a – d:	
a) yes, for transactions and retirements, the format presented in easy to follow and provides information regarding the transaction/retirement date, project in name of who the VCC are being retired, account holder, amount of Credits retired, initial and final serial and serial ID.		

Search for Retirement Transactions

Project Project holder Serial EN

TRANSACTION DATE (YYYY-MM-DD)	PROJECT	IN NAME OF	ACCOUNT HOLDER	AMOUNT RETIRED	INITIAL SERIAL	FINAL SERIAL	SERIAL
2019-05-23	Proyecto Forestal CO2Cero Caucho PL UNO	PUMA ENERGY COLOMBIA COMBUSTIBLES SAS	CO2CERO S.A.S.	10,137	135001	145137	PCR-CO-ECO-14-001-2-1001-1812-0135001-0145137
2019-05-23	Proyecto Forestal CO2Cero Caucho El Viento	PUMA ENERGY COLOMBIA COMBUSTIBLES SAS	CO2CERO S.A.S.	64,863	15408	8027	PCR-CO-ECO-14-002-2-1001-1812-0015408-0080270
2019-05-21	Proyecto Forestal CO2Cero Caucho El Viento	ZEUSS PETROLEUM S.A.	CO2CERO S.A.S.	15,407	1	15407	PCR-CO-ECO-14-002-2-1001-1812-0000001-0015407
2019-05-07	Proyecto Forestal CO2Cero Caucho PL UNO	EMPRESA COLOMBIANA DE PETROLEOS S.A.-ECOPETROL S.A.	CO2CERO S.A.S.	60,000	75001	135000	PCR-CO-ECO-14-001-2-1001-1812-0075001-0135000
2019-04-23	Proyecto Forestal CO2Cero Caucho PL UNO	PUMA ENERGY COLOMBIA COMBUSTIBLES SAS	CO2CERO S.A.S.	75,000	1	75000	PCR-CO-ECO-14-001-2-1001-1812-0000001-0075000

<https://biocarbonregistry.com/en/transactions/>

b) Yes, every person can access to the Credits retirement information without any credential.

c) Yes, Data field are part of a searching system to identify the cancelled units considering project, project holder or serial ID.

d) Yes, all retirement information as Credits available by project can be downloaded in PDF or Excel format.

In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this *Emissions Unit Programme Registry Attestation*.

<https://biocarbonregistry.com/en/carbon-credits/>

<https://biocarbonregistry.com/en/transactions/>

7.11	a. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations on an ongoing basis and for at least three years beyond the end date of the latest compliance period in which the emissions unit programme is determined to be eligible?	<input checked="" type="checkbox"/> YES
	b. Will the Programme Registry retain documents and data relevant to CORSIA Eligible Emissions Units and cancellations consistent with the Programme's long-term planning, including plans for possible dissolution?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement each provision in rows a and b:	
	a. All issued documentation will be available to the user in the registry, including GHG Statements, Retirements statements, Services order, invoices, and contract, without time and space limitations.	

	<p>b. All issued documentation will be available to the user in the registry, including GHG Statements, Retirements statements, Services order, invoices, and contract, without time and space limitations. If dissolution is imminent, the account will be blocked but all relevant information and data will still be saved in the BCR's server to enable the subsequent migration of the data, if instructed by the account holder.</p>
	<p>In the field below, provide link(s) to any web-based evidence of existing registry functionalities and/or of documents demonstrating business practices and procedures for the Programme Registry's implementation of these provisions. Alternatively, or in addition, confirm that such evidence is included as an attachment to this <i>Emissions Unit Programme Registry Attestation</i>.</p>
	<p>Link to BCR Standard Operating Procedures -SOP which include insights of long term and provisions under possible dissolution of the program.</p>