

**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 2, February 2024)

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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 (CORSIA). Together with other mitigation measures, CORSIA will help achieve international aviation's aspirational goal of carbon neutral growth from the year 2020. Aeroplane operators will meet their offsetting requirements under CORSIA by purchasing and cancelling CORSIA eligible emissions units. The ICAO Council determines CORSIA eligible emissions units upon recommendations by its Technical Advisory Body (TAB) and consistent with the CORSIA Emissions Unit Eligibility Criteria (EUC).

In March 2019, the ICAO Council unanimously approved the ICAO Document *CORSIA 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 *CORSIA Eligible Emissions Units*³.

ICAO invites emissions unit programmes⁴ to apply for the 2024 cycle of assessment by the TAB, to determine eligibility to supply CORSIA-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 CORSIA first phase, which will then be considered by the ICAO Council.

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

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

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

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

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

Recommendations from 2023 assessment cycle: <https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx>

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

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 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”. Public comments received during that period, including commenter names and organizations, are published following the decision by the Council in respect of TAB's eligibility recommendations for this cycle. All comments are published as received and Programme responses to public comments are not published on the ICAO website. The applicant shall bear all expenses related to the collection of information for

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/TAB2023/ClarificationsofTABsCriteriaInterpretations.pdf>

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

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.

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 **4 March 2024**. 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: TAB@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 2024 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, including quotes/excerpts of the relevant provisions in the programme's procedures]

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) 4 March 2024. 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 Eligibility⁷, 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.
 - 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

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>

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 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.

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

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. All comments are published as received and Programme responses to public comments are not published on the ICAO website.

SECTION III: RE-APPLICATION FORM

PART 1: General information

A. Programme Information

Programme name: BioCarbon Standard⁹

Administering Organization¹⁰: BioCarbon Cert

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

Telephone #: +57 (323) 3059939

Official web address: www.biocarbonstandard.com

[Click or tap here to enter text.](#)

B. Programme Administrator Information

Full name and title: Stefanny Diaz Rodriguez, Program Manager

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

E-mail address: sdiaz@biocarbonstandard.com

Telephone #: +90 5519589209

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

Full name and title: Angela Duque Villegas, Executive Director

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

E-mail address: aduque@biocarbonstandard.com

Telephone #: +57 (310) 572 7198

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:

⁹ The abbreviation for BioCarbon is BCR. Therefore, in this application format and in the program documentation, we refer interchangeably to "BioCarbon Standard" or "*BCR Standard*".

¹⁰ Name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme, *if different from "Programme Name"*.

Executive Board

- Francisco Javier Manzanares, Chairman of the Executive Board. World Bank Senior Consultant on Carbon Markets.
- Miguel Rodriguez, Biologist, MSc. Physiology Applied to Production Systems Expert.
- Juan Manuel Posada, Ph.D. Biologist, Researcher and Professor. Expert in Plant Optimal Resource.

Advisory Group

- Lucas Zaehringer, Business Administration, Management of Technology and Innovation, Digital solutions, blockchain transparency and tokenization in carbon market trajectory.
- Yves Mariko, Chief Economist / Senior Associate of Africa Energy Transition Services (AETS)
- Onur Günduru, Manager partner of Orun Energy and board member of ENSIA (Turkish Clean-Tech Cluster)

Executive Director

- Angela Duque Villegas, Forestry Engineer, Specialist in Social Assessment of Projects, MSc. Environmental and Natural Resources Economics; Climate Change Expert.

Angela is the founder and CEO of BioCarbon Cert, and is currently responsible for the direction of the company.

Technical Committee Members and advisers

- Cesar Garay Bohorquez, Agricultural Engineer, MSc. Soils and Water; hydrological and hydro-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
- Francly 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 projects.

Program Manager

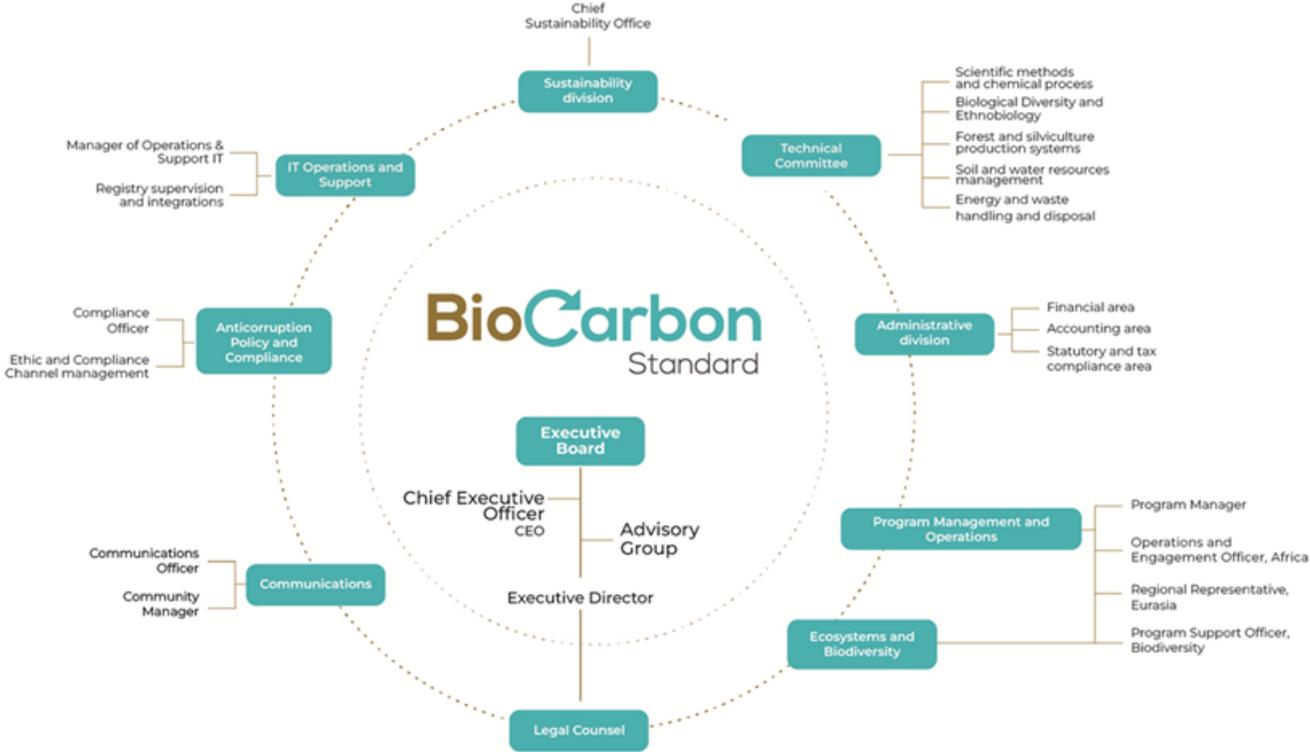
- Stefanny Diaz Rodriguez, Environmental Engineer, MSc. Urban and Regional planning, natural Resources Management and Climate Change.

External Expert Consultant

- Ivan Hernandez, Industrial Engineer; Sustainability, Energy and Climate Change.

Complete list of senior staff / leadership, and related documents can be found in <https://biocarbonstandard.com/en/corporate-governance/>

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.



The circular organization represents the deep care for human relationships and equality among people and departments within BioCarbon. Where the Board and the CEO are at the center of the circle, directing decision-making through the Executive Director to all employees, who are arranged in concentric circles around the core. The dotted lines between members represent the relationships between different areas, and the solid lines represent the lines of decision-making and communication within each area of the organization.

The full contents of the Corporate Governance can be found in Corporate_Governance_document_V 4.0. This document is publicly available at this weblink: <https://biocarbonstandard.com/wp-content/uploads/BCR-Corporative-Government.pdf>. The Organizational Chart is available at this weblink: <https://biocarbonstandard.com/en/organizational-structure/>.

It is important to note that BioCarbon Registry has changed its corporate name to BioCarbon Cert as of December 2023. Despite the name change, the program administration, rules and procedures remain in place. BioCarbon is committed to complying with the applicable criteria and guidelines. The name of the GHG Crediting Program is BioCarbon Standard.

In addition, in order to separate the management of the crediting program from the management and operation of the registry system, BioCarbon has outsourced the management of the registry to Global CarbonTrace (GCT). Outsourcing the management of the registry system is intended to ensure efficient and specialized management of the carbon credits. This separation allows for a more streamlined process and expertise in managing the registry system, while allowing BioCarbon to focus on other aspects of their GHG Crediting Program.

The actions outlined (above) reflect our commitment to establishing and maintaining high standards of governance while strengthening our ability to meet global demand as a climate asset and sustainability crediting program.

As BioCarbon, we look forward to continuing our journey as a leading force in promoting sustainability, integrity and environmental responsibility, and as a crediting program contributing with the climate change mitigation efforts.

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*¹¹ 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*)

¹¹ 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*”.

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 are available and publicly disclosed on the program website (www.biocarbonstandard.com). In the [BCR Standard section 10](#) 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 also emphasizes on 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.
4. Sector Waste: refers to GHG mitigation activities implemented through waste management.

The [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 BioCarbon.

Regarding the 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
- vii. [Energy sector projects eligible](#) under BCR shall apply approved CDM methodologies. All the CDM methodologies accepted by BioCarbon are within the approved scope of eligibility of CDM under the CORSIA eligible emissions units.
- viii. AFOLU: Methodology: Natural Savannas is a methodology that focuses on activities that prevent land use change in natural savannas.

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 the version 3.3.

The list of the CDM methodologies that are accepted under BioCarbon as well as updates are informed through the [program’s website](#).

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 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 [BCR Standard Operating Procedures \(SOP\)](#).

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 the team involved in the process and the timeline are presented in [Methodology Development and Approval](#).

The [BCR Standard Operating Procedures -SOP](#), informs about the objectives, functions, and procedures to ensure the quality of the process during certification and registration of GHG projects. The SOP aims to facilitate guidance to projects and the interested parties on the procedures in place at BCR and access to applicable tools.

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”*):

Links to documentation were updated considering their location in the www.biocarbonstandard.com website.

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 tool available [Methodologies Development and Approval](#), summarizes the procedure established by the [BCR Standard](#) and provides clarification on the methodological process, criteria for development, timeline, evaluation, public consultation, and approval.

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 tool Methodologies Development and Approvals has been updated, incorporating additional requirements for the development of new methodologies. This, in order to ensure that the methodologies are complete, robust and

effective. The full contents of the Tool can be found in publicly available at this weblink: https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf.

The updated version of the tool includes procedures for developing and evaluating additional methodologies. This encompasses processes for reviewing to ensure compliance with BioCarbon’s conditions, incorporate best practices, and establish the necessary scientific and technical foundation for climate action and carbon markets.

Finally, due to the change in the BioCarbon domain to biocarbonstandard.com, the associated links have also been updated.

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 [BCR Standard](#) defines 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 [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.

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 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”*):

N/A

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 Standard](#) 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 types 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)	Project-level only	Global
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 Scope number, described 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 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.

For more specifics on the current procedures you can refer to **section 14** of the [BCR Standard Operating Procedures -SOP](#).

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 eligible sectors and criteria considered by the program have not changed. However, it is important to note here that the sectors and activities included in this application are as follows:

Sector	Supported activity type(s)	Implementation level (s)	Geography (ies)
AFOLU	Afforestation, Reforestation and Revegetation (ARR)	Project-level only	Global
ENERGY	Non-Conventional and Renewable Energy Sources (NCRE) and Energy Efficiency	Project-level only	Global
WASTE	All activities of sector 13 of CDM	Project-level only	Global

For this application, the Executive Board of BioCarbon has decided to select only ARR in the AFOLU Sector and exclude the transportation sector.

The GHG removal activities methodology has been updated to version 4.0, and its name is now BCR0001 Quantification of GHG Removals- Afforestation, Reforestation, and Revegetation.

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. The 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**: 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

BioCarbon allows project based and programme of activities (called grouped projects).

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 3.3. Offset credit issuance and retirement procedures

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

Are procedures in place defining... (<i>Paragraph 2.3</i>)	
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:

- a) 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). The document **Standard Operating Procedures section 14.5** informs about procedures for the Verified Carbon Credits VCC issuance procedure.

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’s serial](#) through the Registration Platform ensures that:

- a) The same serial number shall not be issued more than once;
 - b) Serials have an assigned destination and therefore cannot be used for other purposes;
 - c) Once a serial has been retired it is deducted from the user's accounting of available VCCs and cannot be used again.
- b) There are four rules that are controlled from the platform. Refer to section 14.6 of the [Standard Operating Procedures](#) :
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 registered.
 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 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) The BCR program does not apply discounting.

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](#).

- 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.

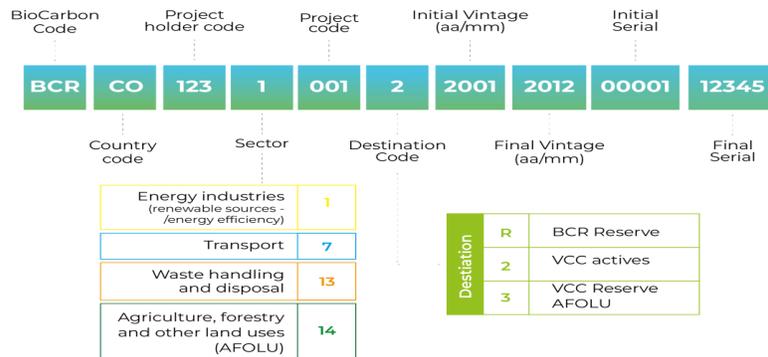
B. Summary and accompanying evidence of any updates or changes to the programme elements described in “A” that were initiated following the previous application or the Council’s approval of programme eligibility (*if none, “N/A”*):

a) [Section 14.5](#) in the SOP document explains that the issuance of Verified Carbon Credits (VCC) is possible once the verification process and the subsequent evaluation of the technical team of Biocarbon are concluded. The number of VCCs issued through the Registry platform will always be equal to the number of GHG removals or reduction verified by a CAB and approved by BioCarbon.

The BCR Identification has been updated, reflecting modifications in the categories under “Destination”, making a differentiation between “BCR Reserve” and “VCC Reserve AFOLU”. More details on Reversal Risk Management are explained in the section/question 4.5 of the application format.

Document reference [SOP – section 14.5.1 Serial Identification](#). Also, the [registry system](#) discloses Serial ID information.

BioCarbon Standard



b) N/A

c) The Registry applies discounts related to the BCR Reserve and AFOLU Reserve, as outlined in the BioCarbon Standard **Section 13.1** (Reversal Risk Management). See <https://globalcarbontrace.io/docs/page/Serials-BioCarbon.pdf> and Section 13.1 of the BioCarbon Standard.

There are two Reserve Accounts: the VCC Reserve AFOLU, specific to AFOLU projects, and the General Reserve Account (BCR Reserve), applicable to any registered project. Any reserve of credits is calculated and deducted from the total issuance, ensuring a permanent reserve of credits for a project in the event of a reversal.

For the AFOLU Projects, a total discount of 20% is applied during each verification period. A ten percent discount is applied to the Verified Carbon Credits generated by the project. This discount is placed in a reserve account specifically designated for that project (VCC Reserve AFOLU). The other 10% of VCCs generated during the verification process are placed in a General Reserve Account in the BioCarbon Reserve (BCR Reserve).

For the projects outside the AFOLU sector, a 10% discount is applied, all of which is placed in the General Reserve Account (BCR Reserve). This discount aims to ensure that any emission units that compensate for the material reversal of reductions issued as emission units and used to offset obligations under CORSIA are fully eligible for use under CORSIA. In consequence, the use of credits outside the General Reserve Account of BioCarbon is limited to the same project type to address reversals. BioCarbon is adding a label stating that only CORSIA eligible credits within the reserve account will be used to hedge against reversals from other CORSIA eligible projects.

Detailed procedures regarding the Reserve (BCR Reserve and VCC Reserve AFOLU) are available in **Section 13.1** of the BioCarbon Standard, publicly accessible at: https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf.

d) Length of Crediting periods has been updated. The full contents of these procedures can be found in BCR Standard, **Section 10.5** (Quantification Periods). This document is publicly available at: https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

e) Project quantification periods under BioCarbon shall be renewed as described in **Section 10.5.1** of the BioCarbon

Standard. This document is publicly available at: https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Question 3.4 Identification and Tracking

Does the programme utilize an electronic registry or registries? (Paragraph 2.4.2)	<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.

- 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/#>

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”*):

Since December 2023, the registry has been managed and operated by an outsourced third party, Global

CarbonTrace (GCT), serving as the independent registry administrator for BioCarbon. GCT strictly adheres to the established policies and procedures of BioCarbon, ensuring the continuity of identification and tracking provisions.

As an autonomous entity, GCT possesses extensive expertise in registry systems, allowing for the creation of a fully customizable and secure environment that aligns with program requirements.

Direct access to the Registry system is available through the website: <https://biocarbonstandard.com/en/>



Information regarding registry characteristics, security, and measures to enable traceability and accounting can be consulted on the website. Updated links for:

GHG Projects: <https://globalcarbontrace.io/projects>

Verified Carbon Credits: <https://globalcarbontrace.io/carbon-credits>

Transactions/retirements : <https://globalcarbontrace.io/transactions>

Login for users: <https://globalcarbontrace.io/login>

Registration page: <https://globalcarbontrace.io/register>

Information about registry functionality and the user environment can be found in the Registry Platform Handbook and Good Practices.

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 ? (<i>Paragraph 2.4.3</i>)	<input checked="" type="checkbox"/> YES
b) identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement? (<i>Paragraphs 2.4 (a) and (d) and 2.4.4</i>)	<input checked="" type="checkbox"/> YES
c) identify unit status, including retirement / cancellation, and issuance status? (<i>Paragraph 2.4.4</i>)	<input checked="" type="checkbox"/> YES
d) assign unique serial numbers to issued units? (<i>Paragraphs 2.4 (b) and 2.4.5</i>)	<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? (<i>Paragraph 2.4.5</i>)	<input checked="" type="checkbox"/> YES
f) are secure (i.e. that robust security provisions are in place)? (<i>Paragraph 2.4 (c)</i>)	<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, the registry system has the capability to adapt how the information is displayed and categorized to

identify the ICAO- eligible emission units. 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”.

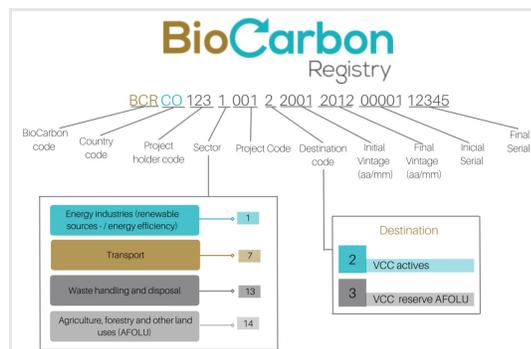
b) Yes, the registration platform has the capability to assign a unique identification for users, projects, and VCC. Through the Platform, BCR has the capacity to track any registration request, holding user, transfer, and retirement, from issuance to retirement. Also, in the Project’s Registry environment, 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 VCC 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 (yyymm)
- Ending Vintage (yyymm)
- 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](#).

- f) We inform that the program 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.

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) Changes have been made to the sections in the previous submission format. [The Standard Operating Procedures Section 15, Traceability and Custody](#), and [Section 18.2 Public Registry](#), describe aspects regarding tracking and transfer. The [Manual of use and good practices of the registration platform](#) in [Section 9.0, Public Registration](#), sets out information for new projects and users on how the information shall be uploaded and which parts are publicly disclosed on the system.

Access to the registry system to identify and track ownership of issued and retired VCCs.: <https://globalcarbontrace.io/>

c) Webpage update: the status of Verified Carbon Credit (VCC) is disclosed on the page: <https://globalcarbontrace.io/carbon-credits>

Verified Carbon Credits (VCC)											
VCCs issued by Global CarbonTrace comply with stringent procedures and subject to robust verification processes offer credibility and reliability in terms of the claimed carbon reductions or removals they represent											
Carbon Credits Search		Issuance Date	Amount of Credits	Serials	Project ID	Project holder	Vintage Home (AAAA-MM-DD)	Vintage Final (AAAA-MM-DD)	Retired	Available	Country
Serials	<input type="text"/>	2024-01-19	4,538	BCR-CO-261-14-001-R-2301-2301-0000001-0004538	BCR-CO-261-14-001	Bosques de la Primavera S.A	2023-01-01	2023-01-29	0	4,538	CO
Project ID	<input type="text"/>	2024-01-19	54,180	BCR-CO-261-14-001-R-2201-2212-0000001-0054180	BCR-CO-261-14-001	Bosques de la Primavera S.A	2022-01-01	2022-12-31	0	54,180	CO

Section 8.0, Public Registration of the Registration Platform Document, Manual of use, and good practices of the registration platform informs about the type of information disclosed in the VCC status.

d) The previous information provided is still valid; however, there is an update to the Serial ID as indicated in the **SOP Document Section 14.5.1. Serial Identification and Registry website:** <https://globalcarbontrace.io/serials>

e) **Serialization at BioCarbon** considers all of the above (country code, sector, User ID, Project Number, Type of destination, starting and ending vintage, initial and final serial).

f) The Manual of Use and Good Practices for the registration platform contains information on the functionalities, measures, and procedures being implemented to ensure robust security. Please refer to **Section 11** for more details.

If the programme registry has the capability to directly transfer units to/from any other registries that are not operated by the programme, list any/all other registries to which the programme’s registry(ies) are linked:: (Paragraph 2.4 (e))

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 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, guaranteeing 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 though 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](#).

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”*):

Yes, the registry has the capability to directly transfer units to/from any other registries that are not operated by the program. In 2023, the Registry enabled the transfer of information through the CAD Trust initiative (<https://climateactiondata.org/>). This integration aims to facilitate access to decentralized data and contribute to global efforts of transparency by integrating the registry system and CAD Trust, including traceability.

Furthermore, BioCarbon has been integrating with the Carbon Trade Exchange (<https://ctxglobal.com/>) and other market platforms as part of its experience in connecting to other platforms and registering external users. These interconnections facilitate market interaction and transparency.

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”*):

Complementary information:

Currently, BioCarbon Registry has no data exchange with other program’s registry(ies). Nevertheless, the registry of BioCarbon has the capability of enabling information sharing with other program registries.

The BioCarbon registry (GCT Registry) is a cloud-based platform that maintains registry services under the highest standards of security and reliability. Secure communication standards, such as the latest versions of SSL/TLS, are used. The registry platform provisions comply with ISO/IEC 27017 and other standards from the ISO 27000 group, particularly ISO 27001. By implementing ISO 27001 and enhancing the principles of GCT, the management of the platform ensures confidentiality, availability, integrity, connectivity, and transparency at any time.

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:

The [Code of Ethics](#) and Anti-Corruption Policies and Procedures that were under development during the application 2022 were finalized and implemented during 2023. Procedures are in place to ensure monitoring and compliance with best practices for robust governance. 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 guide 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://biocarbonstandard.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.

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”*):

Complementary information:

The provisions mentioned in section A remain in force.

In addition to the program rules and procedures outlined above to prevent conflicts of interest, specific clauses are included in staff and third parties’ contracts, along with declarations confirming the absence of financial, commercial, or fiduciary conflicts of interest. In case of any suspicious or grievance, BioCarbon provides the Ethics and Compliance Channel for communication of concerns, doubts (<https://canaletico.es/en/biocarbonstandard>, breaches, or violation of the [Code of Ethics](#), as well as suspicious of practices linked to conflict of interest.

Procedures for investigations and the redress mechanism are described in the [BCR Whistleblowing Policy and Internal Investigations Manual](#). This policy applies to all personnel within BioCarbon Registry, including directors, officers, employees, temporary staff or workers, and volunteers, as well as to all third parties such as business partners, CABs, collaborators, intermediaries, consultants, clients, suppliers, agents, commercials, subcontractors, and professional service providers, among others. Adherence to this policy is mandatory, and noncompliance could lead to disciplinary action as per our Disciplinary Policy and Procedures.

- Grievance Mechanism and Ethic Code: <https://biocarbonstandard.com/wp-content/uploads/BCR-Code-of-Ethics.pdf>
- System for Petition and General claims: <https://biocarbonstandard.com/en/pcc/>

- User guide of the ethics and compliance channel: <https://canaletico.es/en/biocarbonstandard>
- BCR shows on the website¹² the number of investigations ongoing, the type (see options displayed from a -j) of complaints, and their status.
- [BCR Disciplinary Policy and Procedures](#)

Some documents updates resulted from the periodic review and improvement:

- [Code of Ethics version 2.1](#)
- [Impartiality Management in the procedures of certification and registration version 2.1](#)
- [Anticorruption Policies and procedures](#)
- [Disciplinary Policy and Procedures](#)
- [Whistleblowing Policy and Internal Investigations Manual](#)

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) BioCarbon 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.

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- b) Procedures are described 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 governments¹³, 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 Acunetix¹⁴), 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

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 measures for screening, restricting accounts, and implementing security features remain in effect.

- a) Complementary information:

Screening of registry account is a process conducted by the registry administrator each time a company or individual requests an account opening on the platform.

During the account opening process, the user is required to provide the “Know your customer” document, which can be downloaded from the system and must be completed in full.

The full contents of these procedures can be found in the Handbook. The document is publicly available at this link: https://globalcarbontrace.io/docs/page/BioCarbon_Handbook-and-good-practices-Registry-Platform.pdf.

- b) Complementary information:

After evaluation of the screening process, GCT will either accept or reject the creation of an account for the assessed individual or organization. An account cannot be created in GCT without first completing and successfully concluding the Know Your Customer process.

- c) Complementary information:

¹³ 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.

¹⁴ 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.

The GCT Registry Platform is designed with various modes of failure recovery, audit and backup systems to ensure robust security:

- A blockchain-based database has been implemented. The registries are based on Hyperledger Fabric technology, which includes all the security mechanisms that guarantee the integrity of the data stored in the BlockChain.
- The Database implementation includes a backup system that serves a full recovery opportunity 3 daily automatic database backup.
- Robust services of Vultr ensure that there is no downtime, data loss, or any type of malicious activity attacking the servers. Based on the cloud and bare metal servers, the system provides strong security features to protect against various types of attacks.
- CloudFlare is utilized as a Firewall and protective shield for the web and registration platform.
- The preventive and corrective maintenance of cyber threats include (among others): prevention of unauthorized entry to the website as plugins and code (hacking), elimination of recurrent hacking, prevention of modification of site content.
- The Maintenance includes review of operating system configurations, Apache and PHP, vulnerability scanning, security analysis of all sites (blackbox, greybox, whitebox), detection and identification of malware present on the server, implementation of recommendations and server configuration settings, and site remediation.

Taking into account strong security considerations, BioCarbon requires the registry administrator to evaluate registry compliance with security provisions. In consequence, security features are reviewed monthly to ensure they are in line with security best practices. The assessment is carried out by cybersecurity software (vulnerability scanning through *Acunetix*). The *Acunetix* vulnerability scanning application 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.

In addition, Global CarbonTrace shall perform semestral assessments related to hacking, ethical hacking, static and dynamic code tests, and stress tests to access the platform to generate transparency and reliability.

The full contents of these procedures can be found in the Handbook and Good Practices Registry Platform (https://globalcarbontrace.io/docs/page/BioCarbon_Handbook-and-good-practices-Registry-Platform.pdf) and the Standard Operating Procedures (https://biocarbonstandard.com/wp-content/uploads/BCR_Standard-Operating-Procedures.pdf), in their current versions.

Question 3.5 Legal nature and transfer of units

Does the programme define and ensure the following:	
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
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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.

- a) **See Section 22.1 Validation, 22.3** of the BCR Standard. 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.
- b) 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.
- c) 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 Standard section 22 Validation and Verification](#) and the [BCR Standard Operating Procedures \(SOP\)](#). Section 14.2 Validation and Verification.

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”*):

Complementary information:

In 2023, BioCarbon signed an agreement with ANSI -National Accreditation Board (ANAB),¹⁵ which is an accreditation program for Validation/Verification Bodies operating in accordance with ISO 14065.

The Validation and Verification Manual has been updated to its 2.3 version as of January 2024. Throughout 2023, the program reinforced provisions related to professional liability insurance and imposed restricted conditions on Conformity Assessment Bodies (CABs) to perform the validation and verification processes occurring at different times. Please refer to **section 9**. General validation and verification requirements.

Furthermore, detailed information has been provided regarding the role of CABs in assessing project information, national registry systems, and other sources. This is aimed at preventing situations of double counting and identifying, during validation and verification, any risks associated with overlapping.

Reinforced measures to ensure compliance with the Anti-Corruption policy, emphasizing the principles of no conflict of interest, impartiality, and annual evidence-based training.

TAB can get access to the following files: Format of agreement BCR with CABs and examples of COI signed, Example of Clause added in the professional contracts, and Example of CABs contract and not a conflict-of-interest declaration¹⁶.

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 Government 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) [The BCR Standard Operating Procedures \(SOP\)](#) document, encompasses all the general procedures applied by the BCR program.

¹⁵ <https://anab.ansi.org/>

¹⁶ Link: https://drive.google.com/drive/folders/11FO9CPN0mMApwmzT8r-UgmgAf5owSmn0?usp=drive_link

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) Complementary information:

To provide additional details about responsible administration of BioCarbon Cert and decision-making processes, we would like to inform that BioCarbon publicly discloses information on its website in the governance section <https://biocarbonstandard.com/en/corporate-governance/>

1. Name, photo, and profile of Executive board members, CEO, Advisory Group, Technical Comity, and Staff of the company.
2. Organizational structure chart.
3. Governance Corporative document, which contains:
 - a) Description of responsibilities and functions within the BioCarbon team can be found in **Section 5 - Organizational structure**. This section also encompasses information about the new Advisory Group (**Section 5.6**), which aims to provide support and advice to the Executive Board on new regulations and their potential impact on the carbon market. Additionally, the Advisory Group offers expertise in the innovation of new methodologies, conceptual approaches, and developments in technology and digital solutions.
 - b) Description of the decision-making process, **Section 6** which explains the flow of the decision-making process considering those atypical cases that fall outside of normal operations and procedures described in Standard Operating Procedures SOP.
 - c) **Section 7**. Long Term Plan which links and describes the decision of the executive board to underline a set of provisions for its multi-decade planning and the measures for preparedness and adaptability to unforeseen circumstances. **The Long-Term Management Plan** document is for internal use of the company and therefore remains confidential but can be consulted for ICAO as per the current assessment.
 - d) **Section 8**. The Anti-bribery Policy, which provides links to and describes the anti-bribery policy of BioCarbon, aims to ensure that BioCarbon complies with both local and international anti-corruption regulations and standards.
 - e) **Section 9**. BioCarbon complies with national legislation governing privacy and data protection, given that it maintains a public registry provider that contains information on GHG projects, project holders, validation and verification bodies, and stakeholders.

4. Complementary information:

The updated BCR Standard Operating Procedures (SOP) document encompasses all the general procedures about how decisions are made. This document is publicly available at this weblink: https://biocarbonstandard.com/wp-content/uploads/BCR_Standard-Operating-Procedures.pdf

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:

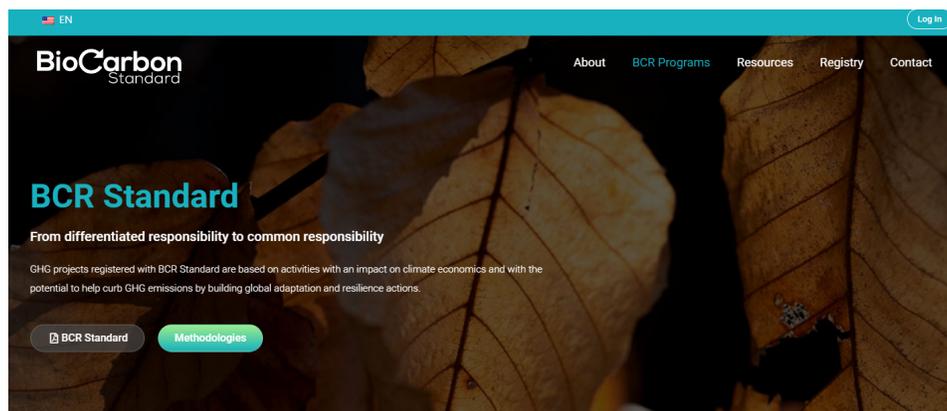
- a) Yes, the Company was founded in 2018 as ProClima ESAL. Since then, it has been dedicated to the certification and registration of Greenhouse Gas (GHG) projects and promoting climate change actions. The company has developed its program promoting low-carbon growth while ensuring compliance with national 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) 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.

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) To enhance the information on BioCarbon’s continuous governance for the past two years, additional details are provided:

The company, initially established as ProClima in 2018, witnessed the full operationalization of the ProClima Program in the same year. Subsequently, by January 2021, an updated version of the GHG Program was introduced. BioCarbon ensures transparency by making all previous program versions accessible on its website ([here](#)).



Document History

This document was open for public consultation from January 10, 2022 to February 09, 2022.

Public Consultation Document

Previous Versions

In 2022, ProClima underwent a rebranding to BioCarbon Registry, emphasizing a broader scope that includes biodiversity initiatives while maintaining the established governance structure. The shift aimed to reinforce connections between climate change and other agendas.

A key element of BioCarbon’s governance involves actively seeking and nurturing alliances. Current affiliations include the United Nations Global Compact (since 2021), Mountain Partnership (since 2022), Global Reporting Initiative-GRI (since 2023) and Grassroot Institute (2023).

In 2023, the Executive Board, which is committed to establishing and upholding rigorous standards in company and program-related governance, decided to spin off the registry from the company. This led to the creation of

BioCarbon Cert in December 2023, with Global CarbonTrace assuming the role of registry administrator.

b) As additional evidence of continuous **operation** over the past two years, we provide the following points:

The first version of the ProClima Program (now BioCarbon) and the corresponding methodological document for GHG projects were released in 2018. In the following tables you will find the resume information until now days:

Document title (Standard)	Version	Publication Date
ProClima Program	Version 1.0	July 18, 2018
	Version 1.0 (updated)	December 1, 2019
	Version 2.0	April 7, 2020
	Version 2.1	October 19,2020
	Version 2.2	July 22, 2020
	Version 2.3	October 19,2020
	Version 3.0	May 13,2021
ProClima- Standard for the Voluntary Carbon Market	Version 1.0	January 7, 2021
BCR Standard	Version 2.0	February 14,2022
	Version 2.1	September 21,2021
	Version 3.0	March 7, 2023
	Version 3.1	July 25, 2023
	Version 3.2	September 23,2023
	Version 3.3	March 4, 2024 (Current Version)

Program	Methodologies	Version	Publication Date
ProClima	Methodological Document Sectoral GHG mitigation project in the AFOLU sector	Version 1.0	December 10,2019
		Version 2.0	March 27,2020
		Version 2.1	August 27,2020
		Version 2.2	October 19,2020
	Quantification of GHG Emission Reduction or Removals from GHGH Mitigation Projects. GHG Removal Activities	Version 2.3	November 25, 2021
BioCarbon Registry	BCR 001 Quantification of GHG Emission Reductions GHG Removal Activities	Version 3.0	April 13, 2022
BioCarbon Cert	BCR 001 Quantification of GHG Removals, Afforestation, Reforestation, and Revegetation.	Version4.0	February 9,2024 Current Version

BioCarbon publicly discloses all previous version of methodologies on the website, accessible [here](#).

The registry has maintained operational status for issuing credits since 2019 to the present day. Comprehensive information on project documentation, records of each issuance, and VCC transactions is available on the registry website, linked ([here](#)).

Search for Retirement Transactions

Project Name:

Project holder:

Serials:

Transaction date (YYYY-MM-DD)	Project	In name of	Account holder	Amount retired	Initial serial	Final serial	Serials
2019-07-09	Proyecto Forestal CO2Cero Reforestadores Vichada-Meta	CHEVRON PETROLEUM COMPANY	CO2CERO S.A.S.	1,267	27596	28862	PCR-CO-ECO-14-003-2-1001-1812-0027596-0028862
2019-07-09	Proyecto Forestal CO2Cero Reforestadores Vichada-Meta	ORGANIZACIÓN TERPEL S.A.	CO2CERO S.A.S.	710	26806	27595	PCR-CO-ECO-14-003-2-1001-1812-0026806-0027595
2019-07-09	Proyecto Forestal CO2Cero Reforestadores Vichada-Meta	PETROBRAS COLOMBIA COMBUSTIBLES S.A.	CO2CERO S.A.S.	710	26176	26885	PCR-CO-ECO-14-003-2-1001-1812-0026176-0026885
2019-07-09	Proyecto Forestal CO2Cero Reforestadores Vichada-Meta	CHEVRON PETROLEUM COMPANY	CO2CERO S.A.S.	3,040	23136	26175	PCR-CO-ECO-14-003-2-1001-1812-0023136-0026175
2019-07-09	Proyecto Forestal CO2Cero Reforestadores Vichada-Meta	ORGANIZACIÓN TERPEL S.A.	CO2CERO S.A.S.	1,200	21936	23135	PCR-CO-ECO-14-003-2-1001-1812-0021936-0023135
2019-07-09	Proyecto Forestal CO2Cero Reforestadores Vichada-Meta	ORGANIZACIÓN TERPEL S.A.	CO2CERO S.A.S.	41	21895	21935	PCR-CO-ECO-14-003-2-1001-1812-0021895-0021935
2019-07-09	Proyecto Forestal CO2Cero Reforestadores Vichada-Meta	ORGANIZACIÓN TERPEL S.A.	CO2CERO S.A.S.	43	21852	21894	PCR-CO-ECO-14-003-2-1001-1812-0021852-0021894

c), and d) In order to complete and add details about the long-term management and possible responses to the dissolution of the program, we confirm that BioCarbon considers of provisions for its multi-decade planning and informs about measures for preparedness and adaptability to unforeseen circumstances in its **Long-Term Management Plan**¹⁸.

The Plan (which is for internal use) aims to strengthen governance measure strategic objectives and ensure proper risk management to situations inherent to the management of the program, thereby anticipating and mitigating any potential threat.

Regarding the provision for unforeseen program dissolution, the document describes measures such as a one-year transition period that serves as a buffer to allow strategic alignment with another GHG program to transfer responsibilities, assets, and operations. As well as provisions for project deregistration and the transfer of Verify Carbon Credits to other registries. In line with these considerations, BioCarbon separated the registry from the company, and BioCarbon Cert now operates with is Global CarbonTrace as the registry administrator.

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

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

¹⁸ Document [link](#) available to TAB ICAO.

follow-up discussions and written questions pertaining to this topic:

Anti-corruption policy and procedures in place from 2022.

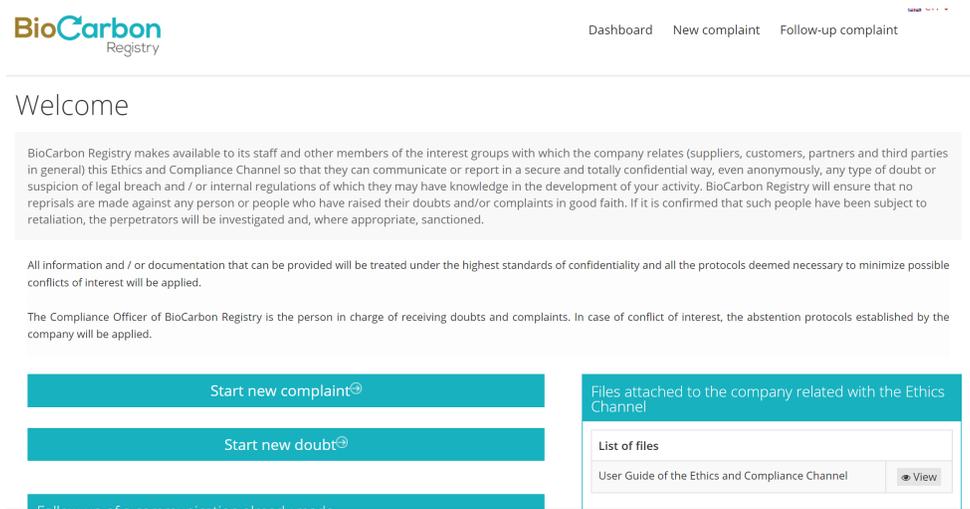
The procedures complement control and monitoring measures already implemented in the program, in addition to ratifying commitment of the program with zero tolerance with unethical practices. BioCarbon Registry relies on its ***Anti-corruption policy and procedures*** including the “**Disciplinary Policy 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.



Code of Ethics: <https://biocarbonstandard.com/wp-content/uploads/BCR-Code-of-Ethics.pdf>

Compliance Officer and anticorruption policies and procedures: <https://biocarbonregistry.com/en/anti-corruption-policy-procedures>

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 link provided in the previous answer has been updated.:

- a) BCR Code of Ethics V2.1: <https://biocarbonstandard.com/wp-content/uploads/BCR-Code-of-Ethics.pdf>
- b) The Ethics and compliance channel: <https://canaletico.es/en/biocarbonstandard>
- c) Compliance Officer and anticorruption policies and procedures: <https://biocarbonstandard.com/en/anti-corruption-policy-procedures/>

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>)	<input checked="" type="checkbox"/> YES
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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 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](#).

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 has a professional liability insurance policy since 2023. Access to the evidence can be found [here](#).

Question 3.8 Transparency and public participation provisions

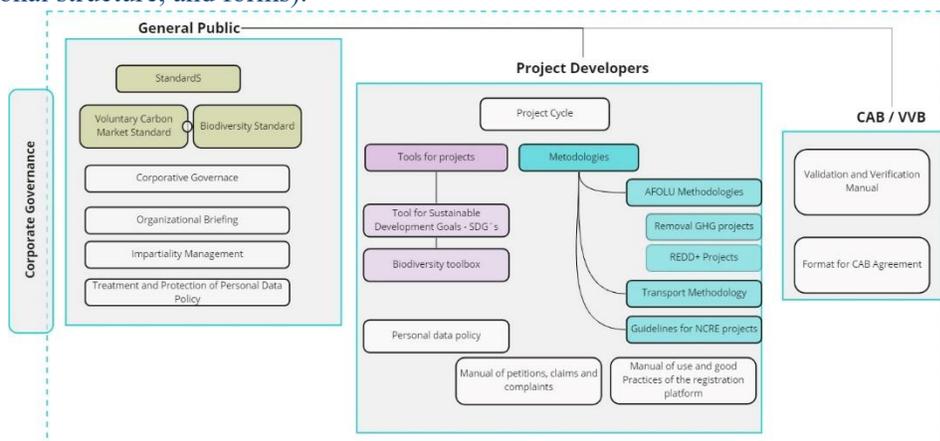
Does the programme publicly disclose... (<i>Paragraph 2.8</i>)	
a) what information is captured and made available to different stakeholders?	<input checked="" type="checkbox"/> YES
b) its local stakeholder consultation requirements (if applicable)?	<input checked="" type="checkbox"/> YES
c) its public 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 [Standard Operating Procedures \(SOP\)](#) 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 company organizational structure, and forms).



2. In the Projects relevant information (display through program 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 [Standard Operating Procedures \(SOP\)](#) **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) Section number changed. In the updated version of the Standard Operating Procedures (SOP) Version 1.1, the information related to public disclosure in the registry is now described in **Section 18.2 Public Registry**.

b) The section that informs about public consultation at the Standard Operating Procedures (SOP) has changed to **13.1 Public Consultation** on its updated version. The sections referred to the BCR Standard remain same.

c) A procedural update allows anyone to directly access the project information on the website and submit a form with comments or concerns for consideration by the project holder. This replaces the previous process (described in Section A) of requesting access to BioCarbon by email (info@biocarbonstandard.com) to obtain access to the full project information. See **section 16.1 Public Consultation - BCR Standard V3.3**.

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) Biocarbon requires that every Standard and Methodological Document undergone to the public consultation process. The Standard Operating Procedures (SOP) Section 8.3 Public consultation.

b) Yes, The complete description about public consultation is described in **section 16.1 (BCR Standard)**. 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.

c) 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 explained in the [BCR Standard Section 16.1. Public Consultation](#), as well as the [Standard Operating Procedures \(SOP\). 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”*):

a) In the updated version of the [Standard Operating Procedures \(SOP\)](#), **Section 13.1** details the public consultation process. The website discloses information related to the methodology/tool or program document, including the document title, objectives, scope of the application, deadline for submitting the comments, and contact details.

Specifically, the public consultation periods for methodologies developed under the AFOLU sector are directly accessible within the methodology sections. You can find information, for instance, through the AFOLU methodologies at the following link: <https://biocarbonstandard.com/en/afolu/>

b) N/A

c) Refer to **section 13.1** [The Standard Operating Procedures \(SOP\)](#).

d) N/A

Question 3.9 Safeguards system

Are safeguards in place to address... (<i>Paragraph 2.9</i>)	
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:

BCR in 2022 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 socio economic 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.

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”*):

Projects applying for registration under the BioCarbon shall implement a process of social and environmental due diligence as outlined in the BCR Standard. These requirements are publicly available in the 'Sustainable Development Safeguards' document. This document is publicly available at this weblink: https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf.

This document/tool extends the provisions in the BCR Standard, sections 14 and 15. All provisions related to the environmental and social risk are, also, considered in the following documents:

- TOOL TO DEMONSTRATE COMPLIANCE WITH THE REDD+ SAFEGUARDS (https://biocarbonstandard.com/wp-content/uploads/BCR_tool-safeguards-redd.pdf)

- NO NET HARM ENVIRONMENTAL AND SOCIAL SAFEGUARDS (NNH)
(https://biocarbonstandard.com/wp-content/uploads/BCR_no-net-harm.pdf)

- MONITORING, REPORTING AND VERIFICATION (MRV)
(https://biocarbonstandard.com/wp-content/uploads/BCR_Monitoring-reporting-and-verification.pdf)

The project holder shall identify and analyze environmental and social impacts (whether negative or positive) resulting from the project activities and subsequently demonstrate their prevention and mitigation, particularly in the case of negative impacts.

Concerning the environmental aspect, the safeguards encompass the following topics: Land Use, Water, and Biodiversity Conservation. Furthermore, for social aspects, they address Human Rights including labor and working conditions, Gender Equality and Women Empowerment, Land Acquisition, Restrictions on Land Use, Displacement and Involuntary Resettlement, Indigenous Peoples and Cultural Heritage, Community Health and Safety, Corruption, and Economic Impact.

The fulfillment of these indicators per topic is part of the Conformity Assessment Body (CAB) validation and verification process based on the requirements established in the Program and the [Validation and Verification Manual](#). The CAB, through this analysis conducted by the project holder, shall assess due diligence and compliance with the mentioned tool.

Question 3.10 Sustainable development criteria

Does the programme use sustainable development criteria? (<i>Paragraph 2.10</i>)	<input checked="" type="checkbox"/> YES
Does the programme have provisions for monitoring, reporting and verification in accordance with these criteria? (<i>Paragraph 2.10</i>)	<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, 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 of their contributions. The contribution to SDG’s is as well visible in the BCR [Projects registry platform](#), where there exists a column which informs about SDG contribution and specifically mentions 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”*):

The [SDG toolbox](#) was updated in 2023, to align the process of identifying, analyzing, and prioritizing SDGs linked to project activities with program requirements. The update focused on ways to report monitoring progress on SDG targets and the corresponding reflection of SDG assessments by the CABs.

To demonstrate compliance with this requirement, the project holder shall illustrate the project's contribution, determining whether the activities positively impact the actions defined in each SDG indicator. Once the project contributions are identified for a specific SDG, considering the local context, the project holder shall describe how the activities contribute to the targets and indicators of the identified SDG. Consequently, the project holder shall determine appropriate units for measurement to monitor and follow up on the activities and link the evidence of compliance with those activities.

The BioCarbon SDG tool is integrated into the Conformity Assessment Body (CAB) validation and verification process based on the requirements established in the BCR Standard (Section 22) and the Validation and Verification Manual. CABs, based on the presented evidence, shall ensure the project's commitment to SDGs in the short and long term, considering the activities' timeframe and pre-established verification periods.

The full contents of these procedures can be found in SDG Tool. This document is publicly available at this weblink: <https://biocarbonstandard.com/en/tools/>

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:

a) Yes. the [BCR Standard, Section 17. Sustainable Development Goals](#) as the [BCR Standard Operating Procedures \(SOP\)](#) explain how SDG’s are considered as a fundamental criterion for the process of project development therefore validation/verification to become register under BioCarbon. Platform system 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).

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.

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) The SDG toolbox was updated in 2023 to align the process of identifying, analyzing, and prioritizing SDGs linked to project activities with program requirements. The update focused on ways to report monitoring progress on SDG targets and the corresponding reflection of SDG assessments by the CABs.

b) Updates have been made to the Avoiding Double Counting -ADC tool. Measures defined and implemented by the program have been included, with compliance details described in version 2.1. In addition to provisions considered in the initial version, the updated tool distinguishes measures for avoiding double issuance (**Section 8.1**), preventing, and managing the risk of double use (**Section 8.2**), and preventing double claiming by countries (**Section 8.4**) of Emission Units (VCC) issued by BioCarbon and used under the CORSIA scheme.

Clear reference to procedures to be execute under double counting occurrence and the compensation mechanism (**Section 8.6**) have been introduce, along with the steps considered for reconciling situations and managing overlaps of GHG project (**Section 8.7**).

Moreover, the updated ADC tool emphasizes a system of denunciation, investigation, and disciplinary sanctions. Analysis of the best practices and preventive measures to avoid double claims has led to the updating of the Attestation Letter, aligning with the mechanism of reporting and seeking evidence of corresponding adjustments by countries.

Details of the set of provisions in the Updated ADC tool can be consulted on the program’s website: <https://biocarbonstandard.com/en/tools/>

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) 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. 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”.

- b) 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)¹⁹. 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.](#)

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](#)²⁰. 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.

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 response to a clarification request from the Technical Advisory Board (TAB) in 2023, the [BCR Standard Version 3.3](#) and [the Baseline and additionality tool V1.2](#) underwent a review to ensure clarity of the rules followed by projects across different sectors regarding additionality and baseline. The objective of the review and updates pertained to the scope of the sector where the Additionality tool is mandatory (**Section 7 for AFOLU projects and Section 8 for projects under other sectors**) and the corresponding reference at the BCR Standard (**Section 10.6**). This was done to prevent misinterpretations or confusion from project holders.

Provisions for the periodic review of eligible CDM methodologies and tools are outlined in the [Standard Operating Procedures \(SOP\)](#), **Section 13.2.2**. The Technical Committee is tasked with conducting regular reviews and assessments of Clean Development Mechanism (CDM) methodologies, processes, and tools²¹. Following the review, the technical committee communicates its findings, assess implications, and provides recommendations for adaptations, updates, revisions, or changes to CDM contents that may impact the BioCarbon GHG Crediting Program.

¹⁹ Available in <https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-01-v7.0.0.pdf>

²⁰ BCR TOOL. BASELINE AND ADDITIONALITY. GHG projects generate Verified Carbon Credits (VCC) that represent emissions reductions, avoidance, or removals that are additional.

²¹ It has been considered as part of the responsibilities under BioCarbon staff, see details in the [Governance document](#).

The registry system mirrors the updated list of eligible methodologies from CDM that align with the program’s eligibility requirements during the project registration process ([BCR Handbook and Good Practices Registry Platform, Section 3 Inscription and Project registration](#)).

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:

- (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 following the provisions describes in 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.

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 ww.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”*):

a) References to the website and emails are replaced with biocarbonstandard.com and @biocarbonstandard.com.

Minor editorial changes have been made to ensure the interpretation of the requirements established in the [BCR standard](#), **Section 10.6** Additionality and **Section 22**, Validation and Verification. The [Baseline and Additionality](#) tool has been updated to its 1.2 Version during 2023. These modifications were undertaken in response to the clarifications sought by the TAB during sessions in 2023. These sessions aimed to address queries related to the applicability of the baseline and additionality tool across various project types.

b) BioCarbon conducts a review of each project information, including the validation/verification report by the CAB prior credits (VCC) issuance. The [Standard Operating Procedures \(SOP\)](#) communicates in **Section 14.4** Certification and Registration and in **Section 14.5** Verified Carbon Credit issuance²² that:

The BioCarbon team shall conduct a comprehensive review of the request for registration of a project. To formalize the registration of a GHG Project, the project holder shall satisfactorily comply with the applicable rules and procedures (including assumptions for baselines and demonstration of additionality).

The BioCarbon team determines the conformity or non-conformity concerning the fulfillment of the requirements outlined by the BCR standard and applicable legislation, ensuring the integrity of the project.

If a project complies, the Declaration GHG Project document is issued, which includes general information of the project, participants, and the Conformity Assessment Body (CAB).

It is also informed that BioCarbon reserves the right to accept or reject the registration of a project in the registration platform. If incomplete or inconsistent information is submitted, BioCarbon shall reject the

²² *The issuance of VCC will only be possible once the verification process and the subsequent evaluation of BioCarbon's technical team's related documentation are concluded.*

registration of a project until the validation requirements specified in the standard are met.

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 Program in 2022 included a tool call [Baseline and Additionality](#). The main objectives of the 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 (**section 10.6**), moreover reinforcing a set of procedures in place to accomplish provisions linked to additionality.

TAB's request for clarification during 2023 raised findings of missing references between the BCR standard and the BCR Baseline and Additionality tool, as well as other typing errors along the tool document that could lead to misinterpretation of rules and procedures among eligible project types.

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 per TAB's request for clarification during 2023, where doubts regarding the applicability of the Additionality tools apply for AFOLU and other eligible sectors (Energy, waste, and transport), Biocarbon reviewed and updated the tool in 2023 to ensure the accurate interpretation of rules and procedures by projects. The BCR Baseline and Additionality tool is referenced in the [BCR standard](#), **Section 10.6**. BioCarbon has also crosschecked that eligible sectors are fully considered in the tool, and messages to GHG projects are consistent and clear to project holders.

In this sense, the [Baseline and Additionality](#) tool version 1.3 informs that the program requires the use of the CDM Tools that provide a reasonable assurance that the emission reductions/removals would not have occurred in the

absence of the project activities.

For AFOLU projects, the project holders shall apply shall use the Tool developed by the Executive Board of the Clean Development Mechanism (CDM – UNFCCC), the Tool for the demonstration and assessment of additionality (am-tool-01-v7.0.0.pdf), or the document which modifies or updates it.

Project holders in sectors other than AFOLU, such as energy, transport, and waste, shall use the Tool provided by the Executive Board of the Clean Development Mechanism (CDM – UNFCCC). Specifically, they shall use either the Tool for the demonstration and assessment of additionality (am-tool-01-v7.0.0.pdf) or the Tool Demonstration of additionality of small-scale project activities v.13.1, or the document which modifies or updates it.

The full contents of these procedures can be found in BioCarbon Guidelines. Baseline and Additionality. This document is publicly available at: https://biocarbonstandard.com/wp-content/uploads/BCR_additionality.pdf

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: (<i>Paragraph 3.1</i>)	<input type="checkbox"/> YES
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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 aligns with best practices and ensures reasonable assurance that the mitigation results would not have occurred in the absence of the project.

In addition, the Standard Operating Procedures (SOP), Section 19, reinforces the fact that the additionality assessment shall be reviewed and evaluated for the certification and registration. This ensures that an independent, accredited third party auditor (CAB) assesses whether the mitigation would not have occurred in the absence of the project activities. The BCR Baseline and Additionality tool, as developed, affirms 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”*

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 adheres to stringent requirements for establishing a conservative baseline and demonstrating additionality. The BCR Standard specifies that the issuance of VCC shall be grounded in a realistic and credible baseline. Furthermore, the rules related with the VCC quantification include the demonstration that the project holder applies a reasonable, justifiable, and conservative baseline estimation of emissions.

In addition, GHG project holders shall demonstrate that emission reductions (or removals) achieved are not a result of actions legally required by the relevant authorities.

Moreover, a third independent party (CAB) assesses the projects thoroughly and reports whether coherence with program provisions and credible quantification has been presented by the project holder. The information reported by the project holder is evaluated and cross-checked, regarding the application of the Baseline and Additionality Guidelines (https://biocarbonstandard.com/wp-content/uploads/BCR_additionality.pdf). Therefore, BioCarbon is able to assure that ex-post credits are additional to the level of emission reductions or removals that would have occurred in the absence of the program.

Question 4.2 Are based on a realistic and credible baseline

Are procedures in place to... (Paragraph 3.2)	
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:

a) The [Baseline And Additionality Tool](#) provides 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.

b) 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 available²³. When using default values, to follow the conservative principle, traditional values of settings should be used²⁴, for example, by the use of the lower limit of the range of data as long as it corresponds to the most conservative assumption²⁵.

²³ 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

²⁴ 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).

²⁵ The conservative principle shall be ensured by the appropriate choice of parameters affecting the project’s GHG emissions, removals, sinks and reservoirs.

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 (CAB) 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](#).

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”*):

Yes, we confirm that the BioCarbon Program has procedures in place to ensure that all VCCs are issued against realistic, defensible, and conservative baselines. The principles referred in the GHG Program include the “conservativeness” practices. In this sense, the project holder shall use conservative assumptions, values, and procedures to avoid overestimating the emission reductions or the increase of GHG removals.

Projects holders shall apply methodologies eligible under the BCR Standard. In **Section 9** (Methodological documents), BioCarbon requires that all project holders shall apply methodologies eligible under the [BCR Standard](#), demonstrating that the methodology has been applied in full, including the full application of any tools or documents referred to by a methodology or the [BCR Standard](#).

In this way, BioCarbon requires that all methodologies and tools shall establish criteria and procedures for identifying credible, alternative baseline scenarios, and determining the most plausible scenario, as set out in **Section 10.6** of the BCR Standard.

In addition, the application of the BCR Baseline and Additionality Guidelines, is included as a mandatory guidance covering the requirements established to ensure a realistic and conservative estimate of baseline emissions.

On the other hand, the criteria for identifying the baseline scenario align with the ISO 14064-2:2019, Greenhouse gases – Part 2: 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 its updates. This approach ensures that project holders include procedures to determine realistic, defensible, and conservative estimations of baseline emissions.

The project holder shall adhere to the mentioned rules and shall describe the identified baseline scenario in the Project Document (template available in <https://biocarbonstandard.com/en/templates/>). This description shall include all underlying assumptions regarding the establishment of the baseline scenario, consistent with the provisions outlined in the Program documents.

Finally, all projects shall be validated as specified in **Section 22** of the [BCR Standard](#) and the Validation and Verification Manual (https://biocarbonstandard.com/wp-content/uploads/BCR_validation-and-verification-

manual.pdf). As part of the validation process, the Conformity Assessment Body (CAB) determines whether the project meets the program requirements, including the appropriate application of the methodology and identification of the baseline scenario, including the assessment of the conservative assumptions. The CAB's assessment and validation report are available in the public registry.

<p>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>)</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 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.

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

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”*):

We ratify that the BCR Standard has procedures in place to ensure that methods of developing baselines, including modelling, benchmarking, or the use of historical data, use assumptions, methodologies, and values do not over-estimate mitigation from an activity. The [BCR Guidance. Methodologies development and approval](#), provides the basis for baseline determination in the methodological documents. This guidance sets out the requirements that all project methodologies approved under the BCR Standard shall meet, including requirements to ensure that methodologies do not overestimate the mitigation benefits of activities.

BioCarbon establishes criteria and guidelines to meet the uncertainty management associated with models used to estimate emission reductions/removals in GHG projects, which are considered in the methodology documents developed by sector or project type. **Section 11.1** of the [BCR Standard](#) sets out requirements where methodologies use modeling or default factors. BioCarbon has identified requirements where project holders use modeling or default factors.

In addition, **Section 11.1** of the [BCR Standard](#) requires that when relying on uncertain data and information, conservative values are selected to ensure that the quantification does not result in an overestimation of net GHG emission reductions or removals.

Finally, **Section 11.2** of the [BCR Standard V3.3](#) requires that baseline scenarios, including all assumptions, values and procedures, are selected to ensure that GHG emission reductions and removals are not overestimated. The definition should follow the guidelines set out in the BioCarbon methodology documents and other applicable methodologies, using the most recent versions available, and should be: (a) transparently regarding assumptions, methods, parameters, data sources, and factors; and (b) considering uncertainty and using prudential assumptions.

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”*):

Yes, the [BCR Standard](#) provides procedures for project holders to address, as adequate, to changes in baseline

conditions that were not anticipated at the time of registration. **Section 11.2.1** of the [BCR Standard Version 3.3](#) requires projects to reassess their baseline every 10 years. This reassessment will determine whether the project can continue to use the baseline scenario as proposed at the time of validation, or whether the baseline needs to be updated and therefore re-validated.

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 the [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 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. https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf
- 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.

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 includes a [MRV Tool](#)²⁶, 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 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”*):

N/A

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 promoting or dealing in, the offset credits being evaluated?	<input checked="" type="checkbox"/> YES
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) 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.

²⁶ BIOCARBON REGISTRY. 2023. BCR Tool. Monitoring, Reporting And Verification (MRV). BCR carbon credits are quantified, monitored, reported and verified.

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.

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.

During 2022 and 2023 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 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 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.

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”*):

Provisions to prevent conflicts of interest mentioned in Section A remain in force. However, general updates

resulting from the periodic review and update of policy and procedures have been addressed during 2023 and 2024. Therefore, the links provided have been updated to reach the URL linked to <https://biocarbonstandard.com/en/>

Section 9 of the [Validation and Verification Manual V2.3](#) has been updated. The update informs about the restriction for the same CAB to carry out validation and verification that are performed at two different times.

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:

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

Section 13.1 of the BCR Standard 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.

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 set out in **Section 13.1** (BCR Standard V3.3), BioCarbon mandates compensation for any reversals. The project holder shall demonstrate the measures implemented to guarantee that the project’s longevity, either through clauses addressing this objective, or by executing a risk management plan related to cancellations.

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, <i>inter alia</i> , any potential causes, relative scale, and relative likelihood of reversals? (<i>Paragraph 3.5.2</i>)	<input checked="" type="checkbox"/> YES
b) monitor identified risks of reversals? (<i>Paragraph 3.5.3</i>)	<input checked="" type="checkbox"/> YES
c) mitigate identified risks of reversals? (<i>Paragraph 3.5.3</i>)	<input checked="" type="checkbox"/> YES
d) ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA? (<i>Paragraph 3.5.4</i>)	<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) 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 2.2.1.7.8.5²⁷. 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.
- (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.

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. See BCR Standard, **sections 11.3 Leakage and non-permanence**.

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) Yes, we confirm that BCR program includes procedures to require and support these activities to undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals. In accordance with BCR TOOL (Permanence and Risk Management), the GHG project holder shall assess the risks related to the implementation of the project activities in terms of environmental, financial, and social dimensions.

Based on the identification of risks in these three dimensions, the project holder shall design measures to mitigate the risks, ensuring the sustained reduction or removal of GHG emissions throughout the project’s quantification period.

The risk assessment is reported as mandated by the BCR Standard and is incorporated into the Project Document template.

b) Yes, the BioCarbon Program addresses all reversions of AFOLU projects, regardless of the amount of verified carbon credits (VCCs) lost. The available options to handle a reversion event, as well as an underperformance event, are thoroughly outlined in **Section 13** of the BCR Standard V3.3.

As part of BioCarbon procedures, the project holder shall identify potential reversal risks, propose and implement mitigation measures to prevent any carbon releases, and adhere to BCR rules and requirements to compensate for

²⁷ 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.

any reversal occurring during the project quantification period.

Furthermore, the CAB shall demonstrate that it has assessed the risks arising from its validation or verification activities to ensure that all necessary precautions are taken to manage the risk of reversals.

c) The BioCarbon Program includes procedures to require and support actions to mitigate identified risks of reversals.

As outlined in the BioCarbon Risk and Permanence Tool (**Section 5**), risk management is a critical process for identifying, assessing and prioritizing risks that could potentially impact mitigation results. Through effective risk monitoring, project holders should address potential threats. Risk monitoring includes regularly reviewing and updating the risk assessment, implementing controls to mitigate risks, and continuously monitoring changes in project activities that could affect the reported risk and management within best practices.

The project holder shall identify risk mitigation measures. Mitigation measures are actions taken to reduce the impact of risks identified in the risk management process. These measures may include implementing controls, developing contingency plans, transferring risk through insurance, or avoiding certain activities altogether. Effective mitigation measures should be focused on specific risks and regularly reviewed to ensure their continued relevance and effectiveness.

d) Yes, the BioCarbon Program includes procedures to ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA. Any reserve of credits is calculated and deducted from the issuance total, ensuring a permanent reserve of credits for a project in the event of a reversal.

During each verification period, a 10% discount is applied to the Verified Carbon Credits generated by a project. The discount is placed in a reserve account specifically designated for that project. The remaining 10% of VCCs generated during the verification process are placed in a General Reserve Account in the BioCarbon Reserve.

This reserve serves as a guarantee to replace any VCC lost due to unforeseen events that may require the replacement of credits already sold on the market. BioCarbon will periodically reviews and adjust this percentage as necessary.

Where a loss event or a reversal occurs, the project shall comply with the rules for reporting a loss event and holding and cancelling credits set out in **Section 13.1** of the BCR Standard.

The ADC tool, in its updated version, has been reinforced, and details about the mechanisms to mitigate the risk of reversal have been underlined in **Section 8.8.1**. The ADC provides details on the set of provisions to prevent the risk of reversals and informs about the measures to reconcile and fully compensate possible mitigation units (VCC) used towards offsetting obligations under the CORSIA.

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	<input checked="" type="checkbox"/> YES

the programme within a specified number of days?	
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.**

For 2023 BioCarbon informed that General provisions described continues as a requirement for the BCR program. Only an update of a tool called “[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.

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) Yes, the BCR Standard includes provisions that confer liability to the project holder for identifying, evaluating, monitoring, mitigating, and responding to reversals in accordance with the BCR Standard procedures.

As specified in **Section 13.1** of the [BCR Standard V3.3](#), it is required that, in all cases where an event occurs that results in the loss or decrease of the VCCs issued and registered in the registry platform, the project holder shall inform and submit a report to BioCarbon using the Loss Event Report Template, including an estimate of the loss in carbon stocks. The loss event report shall be submitted within one year of the loss event. If a loss event report is not submitted within one year of the loss event, the project will no longer be eligible to issue VCCs.

b) Yes, specifically, the [BCR Standard](#) requires project proponents to submit a loss event report within one year of a loss event as described in **Section 13.1.1** of the BCR Standard V3.3.

c) Yes, the [BCR Standard](#) includes provisions that give the BioCarbon Program the responsibility to ensure and confirm that such reversals are fully compensated upon notification in a manner prescribed by the BCR Standard procedures. Reserve credits are permanently deducted from the total eligible units to be issued for the verification period. Although reserve credits are canceled to cover known or presumed lost carbon, VCCs already issued to AFOLU projects that subsequently experience a reversal are not canceled and do not need to be canceled.

The BioCarbon approach aims to ensure environmental integrity by maintaining a balance between the reserve in the general reserve account and the credits deducted from all AFOLU (Agriculture, Forestry, and Other Land Use) projects. This balance is crucial to ensure that the total number of Verified Carbon Credits (VCCs) issued by projects experiencing reversals does not exceed the cumulative sum of reserves and credits deducted. This approach helps to mitigate the risk of reversals and uphold the credibility of carbon offset projects within the AFOLU sector.

In the occurrence of a loss event or reversal, projects following the BioCarbon approach are required to adhere to the rules outlined in Section 13.1 of the [BCR Standard](#). This section provides guidelines on reporting a loss event, as well as the procedures for holding and canceling credits to address any reversals that may occur within the project. By following these established requirements, projects can maintain transparency, accountability, and environmental integrity in managing and addressing any adverse events that may impact their mitigation results.

Does the programme have the capability to ensure that any emissions units which compensate	<input checked="" type="checkbox"/> YES
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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? (<i>Paragraph 3.5.6</i>)	
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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:

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.

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”*):

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?

BioCarbon requires that reversals be compensated for in order to ensure the integrity of VCCs and to maintain their effectiveness at VCC issuance. When a reversal occurs, BioCarbon replace the VCCs with others of the same project type (e.g., AFOLU VCCs replaced with AFOLU VCCs). The use of VCCs issued outside of the BioCarbon Program to compensate for a reversal is not allowed.

Units from projects at risk of reversal that qualify for use in CORSIA are safeguarded by permanence practices throughout the life of each unit's permanence period. This protection ensures the long-term integrity and reliability of the VCCs used by CORSIA participants for compliance. By implementing strong permanence practices, the environmental integrity of Verified Carbon Credits (VCCs) remains secure, mitigating risks associated with potential reversals and upholding the credibility of the BCR Program. Therefore, we consider that CORSIA participants using VCCs for compliance do not bear any risk to the environmental integrity of their specific VCCs.

Every VCC issued in the AFOLU Sector is assigned a serial code corresponding to the reserve. Both VCCs and reserves are public and available for consultation on the GCT Registry. Currently, VCCs are pooled across project types within the reserve account. However, the use of credits outside the General Reserve Account of BioCarbon is limited to the same project type to address reversals. BioCarbon is adding a label stating that only CORSIA eligible credits within the reserve account will be used to hedge against reversals from other CORSIA eligible projects.

Assigning a unique serial code to every carbon credit issued in the AFOLU (Agriculture, Forestry, and Other Land

Use) Sector and linking it to the corresponding reserve enhances transparency and traceability in Verified Carbon Credits (VCCs). By making both VCCs and reserves public and accessible for consultation on the registry platform (GCT Registry), stakeholders can easily track and verify the origin and authenticity of these credits. Additionally, the pooling of VCCs across project types within the reserve account, with limitations on their use outside the General Reserve Account of BioCarbon to the same project type, determine addressing reversals and maintaining the integrity of GHG projects.

The incorporation of a label specifying that only CORSIA-eligible credits within the Reserve Account will be utilized to safeguard against reversals from other CORSIA eligible projects further reinforces the commitment to compliance and environmental integrity within the BioCarbon Program. This targeted approach ensures that credits used for offsetting obligations under CORSIA meet the necessary criteria, enhancing the credibility and effectiveness of GHG projects within the aviation industry.

Whenever project reporting indicates that loss event has occurred, the BioCarbon Program requires a retirement out of the Reserve Account. Credits are retired from the reserve, based on project type and sector, as appropriate. This means that AFOLU credits within the AFOLU reserve are used to compensate for reversals from AFOLU projects. In addition, CORSIA eligible credits will be supported by CORSIA eligible credits from the reserve. The reserve is not an automated retirement system. Retirements out of the reserve for addressing reversals would be a manual action by the administrator of the registry.

These procedures are described in the Program Documents ([BCR Standard](#), [BCR Handbook](#) and [Good Practices Registry Platform](#), and [ADC Tool](#)).

<p>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? (<i>Paragraph 3.5.7</i>)</p>	<p><input checked="" type="checkbox"/> YES</p>
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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. Nevertheless, 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”*):

All sectors eligible by the BioCarbon Program have a potential risk of leakage. However, addressing the potential

risk of leakage under the BioCarbon Program is a critical aspect of ensuring the effectiveness and credibility of GHG Projects.

According to **Section 11.3** of the BCR Standard V3.3, projects shall conduct thorough assessments to identify potential leakage risks and implement appropriate mitigation measures. Projects within the program are required to account for leakage in accordance with the provisions outlined in the methodology specific to each project activity. If the methodology states that leakage is not a significant risk for a project activity and is considered minimal, quantifying leakage may not be necessary.

However, if the applied methodology acknowledges specific leakage risks relevant to the project activity and provides methods for quantifying such leakage, projects shall follow these methods and deduct any identified leakage from their accounting emissions.

During validation and verification, the CAB shall assess the leakage management of the project activities (Validation and Verification Manual). This practice ensures that potential risks associated with leakage are mitigated and that transparency, accountability and accuracy in the assessment of project mitigation results are maintained.

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? (<i>Paragraph 3.6</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, [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 forest²⁸ 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:

²⁸ The forest area shall meet the same eligibility criteria as the project area.

- (a) all areas in the forest that are a range of mobility of the agents identified in section.²⁹
- (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).

During 2023 BioCarbon 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;

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”*):

Yes, the BCR Program has measures in place to assess and mitigate incidences of material leakage of emissions that may result from the implementation of an offset project.

All BioCarbon projects shall account for material leakage when quantifying GHG emission reductions/removals, as specified in **Section 11.3** of the BCR Standard V3.3. This requirement ensures that projects accurately assess the overall impact of their activities on emissions and take leakage into account during the quantification process.

Furthermore, AFOLU projects are encouraged to proactively address instances of leakage through project design. This can be achieved by incorporating activities that specifically target leakage mitigation. By integrating measures to mitigate leakage risks into project design, AFOLU projects can enhance the effectiveness and sustainability of their emission reduction efforts.

BioCarbon Program rules provide detailed guidance on the types of leakage that AFOLU projects shall address. This information is outlined in various sections of the BCR Methodological Documents, including **Section 16.3** of BCR0001.

By adhering to these guidelines and addressing leakage concerns throughout project implementation, BioCarbon projects can maintain environmental integrity, minimize unintended consequences, and maximize the positive impact of their activities on emission reductions and removals.

International leakage, which refers to leakage occurring outside the host country, should be identified and mitigated, but does not need to be accounted for or deducted from a country's domestic GHG emission reductions and removals. This approach follows established guidance under the UNFCCC CDM.

²⁹ The mobility distance of the agents can be determined from secondary studies or from the collection of primary information (participatory rural appraisal).

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? (<i>Paragraph 3.6.2</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:

[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? (<i>Paragraph 3.6.3</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, [BCR Standard](#) has 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.

Under this question in 2023 was informed that BCR developed the [MRV Tool](#), which provide more clarity on the requirements related to the monitoring of identified leakages.

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 activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities? (<i>Paragraph 3.6.4</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, [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](#)).

The BCR [MRV Tool](#) details aspects regarding leakages and requirements for GHG projects.

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 4.7 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 (<i>Paragraphs 3.7.1 and 3.7.5</i>)	<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? (<i>Paragraphs 3.7.2 and 3.7.6</i>)	<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? (<i>Paragraph 3.7.7</i>)	<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? (<i>Paragraph 3.7.3</i>)	<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:

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)³⁰;
- (c) provide as well as good practice established under Guidelines Avoiding double-counting under CORSIA³¹;
- (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.

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) As described in the ADC tool **Section 8.1**, provisions are in place for the avoidance of double issuance of VCC. BioCarbon only issues Ex-post units (verified Carbon Credits), equivalent to one metric ton of carbon dioxide equivalent. The VCC represents emissions reductions or removals verified by a third independent party (Conformity Assessment Bodies – CABs); this means that BioCarbon ensures that the VCC issuance is a process that can only result from compliance with the set of requirements established by the program, as informed through the [BCR Standard](#), applicable methodology, and tools.

The program has conditions and procedures in place to ensure that GHG projects seeking migration to BioCarbon from other GHG programs/registries do not pose a risk for double issuance or use (**Sections 8.1.1 and 8.1.2 ADC Tool**). Registry measures during the project registration require a declaration of project withdrawal if the project declares migration from another registry. Similarly, for cases of migration, before accepting the project in BioCarbon, a preliminary assessment led by the technical committee is necessary to fully understand the project’s situation and confirm its fulfillment of the quality requirements set by the [BCR Standard](#).

The preliminary assessment is a case-by-case assessment aiming to provide an overview of the compatibility of the GHG project with the BioCarbon Standard requirements and to accept or reject the intention of migration. Additional references can be found in the Standard Operating Procedures (SOP), **Section 14.3 Application for project registration**.

b) Complementary to the information provided, BioCarbon emphasizes the capability of the registry system to control the issuance of one VCC per each Ton CO2 equivalent, resulting in ex-post and verified reduction or removal. Similarly, registry functionalities ensure that it is not physically possible for more than one user to own a VCC on the registry. Therefore, BioCarbon reaffirms that only one VCC is owned at any given time.

c) Complementary information: As mentioned earlier, once a VCC is retired, it is automatically discounted and permanently removed from circulation, rendering it ineligible for further transfer or retirement. BioCarbon publicly discloses the name of the beneficiary of the retired VCC, which is also recorded on the blockchain, creating an

³⁰ https://unfccc.int/sites/default/files/resource/cma3_auv_12a_PA_6.2.pdf

³¹ <https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/guidelines-for-adc-with-corsia-june-2019.pdf>

immutable record that can be publicly accessed.

d) Yes, the set of measures linked to avoiding double claiming has been reinforced and reflected in the recent version of the ADC tool. **Section 8.4** mandates measures to avoid double claiming, specifying that for VCC eligible under the CORSIA scheme, project holders shall obtain the Host Attestation Letter from the focal point in the project host country. This measure aims to prevent the claiming by countries for advancement toward mitigation targets outlined in their Paris Agreement Nationally Determined Contributions (NDCs).

The **Host Country Attestation**, signed by the host country, declares that the project’s emission units issued or intended for use by BioCarbon are authorized to be transferred for CORSIA purposes. These claims will be considered part of the country's counting adjustment. Refer to **ADC Tool Section 8.4 and Annex A Host Country Attestation**.

The HCA was also updated together with the ADC tool. The changes made aim to clarify the conditions of the authorization from host countries, include responsibilities for Biocarbon’s reporting, and add a statement regarding the country’s definition of the first transfer.

In the event of a potential double claim situation, BioCarbon has outlined actions to be taken, including alerting the International Civil Aviation Organization (ICAO) when evidence of corresponding adjustments is not found. Additionally, a compensation mechanism is established to replace the amount of units under any situation of double claiming, involving Host Countries and CORSIA-used units. **Refer to the ADC tool, section 8.4, 8.5, and 8.8.1.**

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:

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 projects 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 country. Also, it recognizes that the BCR Program to which the letter is provided intends to issue VCC for their emissions reductions.

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) BioCarbon requests project holders with Emission Units eligible under CORSIA to obtain the Country Attestation letter from the focal point of the host country to avoid double claiming. The Host Country Attestation declares 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.

The HCA in its updated version is available in **Annex A**, and rules applicable for project holders are described in **Section 8.4** of the ADC tool. It's important to mention that the HCA letter should be obtained and uploaded on the registry system as a requirement for authorizing the retirements of VCC for CORSIA by aircraft operators under CORSIA. This information is displayed on the project webpage, and complementary measures seeking evidence of corresponding adjustment are included in the program's best practices.

c) The ADC tools has been updated considering underpinned in the program practices, but also expanding the spectrum of preventive and correcting measures under a potential scenario of double counting. In the case for double claiming different steps taking by the program are described including the identification when mitigation activities deliver by projects are under national NDC targets, request of the HCA, disclose on the website, registry functionalities to control use of credits under CORSIA, tracking among others.

d) Yes, it's a condition for the projects with Units eligible for CORSIA to upload on the registry platform the letter signed by the national focal point. This letter will be disclosed on the project website. The rule is described in **Section 8.4, ADC tool** and informed to users as well by the [BCR Handbook and Good Practices Registry Platform](#).

BioCarbon, through the anticorruption policies and practices, considers several measures aimed to align the ADC process with the Ethic Code; therefore, a robust grievance mechanism that includes channels for the public to submit complaints and grievances or denunciate any situation irregular practices during the obtaining of the Host country's letter. Reference **Sections 8.8.4, Anticorruption policies and practices**, ADC Tool.

Does the Programme have procedures in place requiring... (Paragraph 3.7.9)	
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 type="checkbox"/> Emissions units are created where mitigation is not also counted toward national target(s) / pledge(s) / mitigation contributions / mitigation commitments. (Paragraph 3.7.9.1)	
<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:

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. 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. The Tool “Avoiding Double Counting (ADC)”, which provides the information on how BCR addresses double-counting, issuance and claiming of the mitigation results.

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) and b) As per **Section 8.4** of the ADC tool, the HCA attestation provided by host countries shall include a statement declaring the commitment of the country to adjust the national accountability correspondingly. Thus, the GHG emission reductions and removals (VCC) generated by the project (referred to in the letter) will not be communicated under the country’s NDC target. Refer to Annex—A format HCA letter.

Complementary measures have been considered to avoid double claiming, including, for instance, periodic reporting, seeking of evidence of countries' adjustments, and if any situation of double claiming raises, mechanisms for investigation, reconciling situations, and compensation of VCC are contemplated under the set of Avoiding double counting provisions under BioCarbon.

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-claiming?	<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:

BioCarbon Registry has developed new requirements related to Host Country Attestation. 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.

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 per the requirements set out in **Section 8.4 of the ADC tool**, project holders must upload HCA into the Registry. BioCarbon is committed to make Host Country Attestation publicly available through the registry, project page.

e) Refer also to the [BCR Handbook and Good Practices Registry Platform](#) and the [BCR Standard Operating Procedures \(SOP\) Section 18.2, Public registry](#).

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:

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 (CORSIA) 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.

During the initial clarification questions in 2023, TAB requested a clarification regarding the actions taken by the program and how extend BioCarbon compares in the volumes of VCC authorized by countries and national emissions reports. BioCarbon confirmed its willingness to extend the provisions to alert double claiming at that time, but it was not directly included in the ADC tool as a procedure set.

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 has considered provisions to avoid double claiming by countries. Moreover, the reinforcement of measures to obtain evidence of corresponding adjustments for units (VCC) authorized for use under specific schemes such as CORSIA and crosscheck in national reports are in force. Refer to the [ADC tool, Section 8.5.2](#).

<p>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>)</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:

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.

As per initial clarification questions in 2023, TAB has enquired whether the program has procedures to replace or reconcile double-claimed mitigation associated with units under CORSIA authorized by host countries. BioCarbon informed that the host country is liable for the corresponding adjustment and consequently reports to UNFCCC. Therefore, the situation of emissions replacement will be explored together with ICAO.

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 a priority for the ADC tool update, BioCarbon has considered mechanisms to prevent VCC used by operators under CORSIA from also being claimed towards host country mitigation targets. Moreover, a set of compensation and reconciliation mechanisms for double claim situations between host countries and CORSIA were included. Please refer to **Section 8.6**, “Procedures for double-counting occurrence and compensation mechanisms”, and **Section 8.7**, “Reconcile situation and management of GHG projects overlaps” [ADC tool](#).

<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>
--	--

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>
--	--

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 shall³²:

- (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.

In 2023 BioCarbon informed that 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 of the [BCR Standard](#)**). 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 asses Environmental and socio economic aspects, during the Validation and Verification processes including

³² Adapted from ISO 14001. Environmental management systems. Requirements with orientation for their application.

[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.

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

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](#).

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](#) .

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

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 BioCarbon GHG Crediting Program [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](#).

In addition to the procedures explained before, the 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;*

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

PART 5: Programme comments

Are there any additional comments the programme wishes to make to support the information provided in this form?

BioCarbon hereby discloses the set of provisions in place to ensure the reliability and environmental integrity behind each Verified Carbon Credit (VCC) issued by the program. BioCarbon Standard has considered strengths and opportunities of the program, for reinforcement as a basis for continuous evaluation and program improvement, which can be reflected in our responses to this 2024 application.

Enhancements to the program requirements have focused mainly on refining the provisions and procedures that serve as the basis for maintaining the integrity of the program. These updates are intended to ensure that the program operates in a transparent and responsible manner that encourages trust among participants and stakeholders. By strengthening the rules and procedures, the program can effectively guard against potential inconsistencies, thereby enhancing its overall effectiveness and credibility.

Finally, as the Program Administrator, BioCarbon has evaluated its rules and procedures to align with the CORSIA Emission Unit Eligibility Criteria (EUC). The updates made aim to complement, clarify, and extend best practices to meet the EUC requirements.



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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



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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;

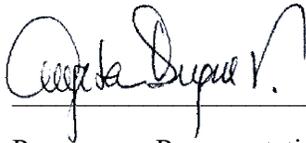
² Only applicable when the Programme submits the signed "*Emissions Unit Programme Registry Attestation*" to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

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

ANGELA DUQUE

Programme Representative Name

SANTIAGO AVILA

Registry Representative Name

BioCarbon Standard

Programme Name

Global CarbonTrace

Registry Name

February 29, 2024

Date

February 29, 2024

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 Standard](#)⁵

Administering Organization⁶: [BioCarbon Cert](#)

Official mailing address: [Carrera 7 # 67 – 02 Office 303. Bogotá D.C.](#)

Telephone #: [+57 323 3059939](#)

Official web address: www.biocarbonstandard.com

B. Programme Administrator Information (i.e., individual contact person)

Full name and title: [Stefanny Diaz, Program Manager](#)

Employer / Company (*if not programme*): [N/A](#)

E-mail address: sdiaz@biocarbonstandard.com

Telephone #: [+905519589209](#)

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

⁴ <https://www.icao.int/environmental-protection/CORSIA/Pages/TAB.aspx>

⁵ The abbreviation for BioCarbon is BCR. Therefore, in this application format and in the program documentation, we refer interchangeably to "BioCarbon Standard" or "*BCR Standard*".

⁶ **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*".

Full name and title: Angela Duque, Executive Director

Employer / Company (*if not Programme*): N/A

E-mail address: aduke@biocarbonstandard.com Telephone #: +57 310 5727198

2. Registry Representative Information⁷

A. Registry Information

Registry / system name: Global CarbonTrace (GCT Registry)

Administering Organization: Global CarbonTrace

Official mailing address: : 7409 Avenue de Lorimier ,Montreal, Canada

Telephone #: +1 (786) 467-08-02

Official web address: <https://globalcarbontrace.io/>

B. Registry Administrator Information (i.e., individual contact person)

Full name and title: Regulo Martinez

Employer / Company (*if not Registry Administering Organization*): Global CarbonTrace

E-mail address: rmartinez@globalcarbontrace.com Telephone #: +57 322 2204555

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

Full name and title: Santiago Avila

Employer / Company (*if not Registry Administering Organization*): N/A

E-mail address: s.avila@globalcarbontrace.io Telephone #: +1 (786) 467-08-02

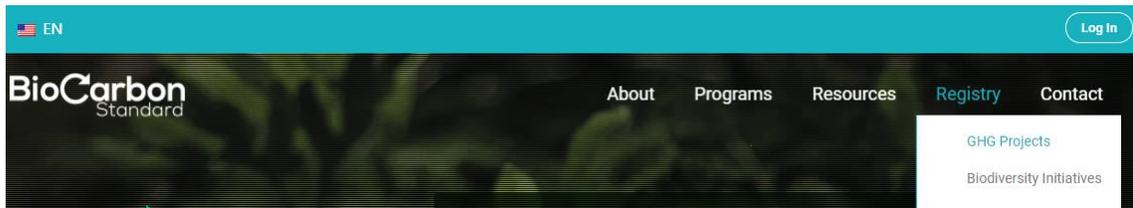
⁷ **Please complete this section**, even if the business, government agency, organization, or other entity that administers the Emissions Unit Programme Registry is the same as the organization described in **Part 2. “1. Programme Representative Information”**.

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 applicable⁸, 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>Global CarbonTrace (GCT) is the administrator of the Registry system of BioCarbon. The registry administrator strictly adheres to the policies and procedures already established by BioCarbon when the administration of the Registry was added to the scope of the program.</p> <p>GCT Registry is a self-governing entity, and the team's in-depth knowledge and experience in the field of registry systems has given them the expertise to create a fully customizable and secure environment to meet the program's requirements. As a registry administrator, GCT acknowledge the set of measures for KYC applicable for users, the program eligibility criteria for project type which is reflected in the picklist of eligible methodologies during the GHG project’s registration.</p> <p>Moreover, in relation to CORSIA objectives, the registry ensures complete traceability of VCC issued and transparent public disclosure of the project’s page. The registry system also has been updated to ensure labeling conditions for CORSIA eligible units are visible following provisions of transparency and countability established by BioCarbon as well as the information submitted by countries (Host Country Attestation letter).</p> <p>BioCarbon acknowledges and ratifies its commitment to the terms of eligibility for inclusion in the ICAO document "CORSIA Eligible Emissions Units" as outlined in our signed "Program acceptance to terms of eligibility" document. Likewise, GCT is obliged to ensure conformity with the procedure for CORSIA Eligible Emission Units described in the attestation for the Program Registry's.</p> <p>Public information regarding the status of units and the cancellation/retirement of units are functionalities implemented by the Registry system website: https://globalcarbontrace.io/</p> <p>GCT as Registry administrator is eager to:</p> <ul style="list-style-type: none"> ▪ Communicate/ notify to ICAO effectively any change update in materials of the registry. ▪ Upon request of ICAO- CORSIA provide information and reports requested. ▪ Enable future integration to systems developed or linked to ICAO aimed to facilitate traceability and accountability of VCC used under CORSIA. ▪ Actively participate in scenarios to provide balance and updates regarding the registry operation and measures in place. ▪ Demonstrate with evidence the effective implementation of measures by the registry platform aligned with provisions required by the program described in the application form. <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>	

⁸ 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.

The Registry system can be directly accessed by public from the BioCarbon website: www.biocarbonstandard.com. Access to the registration platform and illustration which shows step by step registry functionalities.



<https://globalcarbontrace.io/>

The processes of account opening, project certification and registration, and issuance of Verified Carbon Credits (VCCs), involve interaction between the user of the platform and the BioCarbon Team (hereinafter referred to as “the administrator”). This interaction corresponds to a review and approval process. This process takes place after the user has submitted an inquiry, and prior to registration on the platform. The Administrator may approve or reject an application based on the information and documentation submitted regarding compliance with BCR Standard and other regulatory requirements.

The [Handbook and Good Practices Registry Platform](#) version 4.0, is available to the public and informs about the necessary procedures taking place in the registry platform. Those procedures are related to opening accounts, K&C of clients, uploading project information for pre-registration, project registration, issuance of VCC, transfers, and retirements, among others.



The Handbook reflects coherence with the set of provisions for transparency, traceability, and avoiding double counting set by BioCarbon. For instance, the Handbook informs about the responsibility of the administrative team to oversee and supervise compliance with [BCR Standard](#) and other regulatory requirements such as the ones describe in the [BCR Standard Operating Procedures \(SOP\)](#).

During the process of opening account, the user will find:

- Terms and conditions
- Consent of personal data processing
- Agree with the antibribery policy

Each selection has itself a link to the corresponding full document. Thereby, clients have access to the guidelines and rules of the registry and procedures in place defined by the program and the registry. By clicking the checkbox on the left side, the client accepts, consent and agree those.

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 registry 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/client registration
- Project pre-registration (inscription)
- Project registration

	<ul style="list-style-type: none"> • Verification period registration • VCC issuance • VCC transfers • VCC retirements <p>The public Registry is accessible through: https://globalcarbontrace.io/</p> <p>Access to projects and its status: https://globalcarbontrace.io/</p> <p>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 and Host Attestation from Project holders who have obtain such authorization⁹.</p> <p>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.</p> <p>Access to VCC available from registered projects:</p> <p>https://globalcarbontrace.io/carbon-credits</p> <p>Access to information of transactions/retirement:</p> <p>https://globalcarbontrace.io/transactions</p> <p>This evidence is also included in the attachment to this <i>Emissions Unit Programme Registry Attestation</i> and the Handbook and Good Practices Registry Platform.</p>
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	<p>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?</p>	<input checked="" type="checkbox"/> YES
	<p>Describe how the Registry does or will implement this provision:</p>	
7.2	<p>The GCT Registry does not discriminate against any organization or individual based on their country of origin when opening an account on its platform. The registry is designed to support account users from any country in the world and provide support in English and other languages as required.</p> <p>Registry users can access GCT services through various channels such as mobile phone and e-mail. Account creation on the GCT Registry platform is explicitly based on the Know Your Customer (KYC) process implemented by GCT Registry. The KYC process has been defined in accordance with the regulatory framework of the Financial Action Task Force, taking into account the applicable definitions.</p> <p>On this basis, GCT Registry assure and confirm the commitment to ensuring equal access to the registry platform for all CORSIA participants, regardless of the country in which the requestor is headquartered. BioCarbon believe in promoting fairness, transparency, and inclusivity within the carbon market, and denying registry accounts solely based on geographic location contradicts these principles.</p> <p>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</p>	

⁹ More information can be found ADC tool: https://biocarbonstandard.com/wp-content/uploads/BCR_avoiding-double-counting.pdf

	<p>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.</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 Handbook and Good Practices Registry Platform, section 10.0 and the web page discloses the Serial ID. Which is one of the basic elements established by BioCarbon to keep clear traceability of VCC issued and avoid risk of double issuance.</p> <p>Moreover, the Handbook as well describes in detail the interface for users and how those practices for account and project registration respond to program's guidelines aimed to ensure effective filter of reliable users through KYC procedures and transparent and reliable information uploaded related to GHG projects.</p> <p>Functionalities aligned to Avoiding Double Counting practices have been considered for the adaptable registry system and can be seen in the Handbook. Those measures are related, for instance, to the registry capability to inform Projects and VCC characteristics through the website, track all transfers among users in the registry, allow or deny credits issuance, and crosscheck uploading of Host Country Attestation before authorization use under CORSIA among others.</p> <p>Evidence have been included in the attachment of this document.</p>

<p>7.3</p>	<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>	<p><input checked="" type="checkbox"/> YES</p>
	<p>Describe how the Registry does or will implements this provision:</p>	
	<p>The registry system and the public platform work integrated to identify and inform which are the ICAO-eligible emission units. This eligibility starts from the request to upload the HCA (Host Country Attestation) signed by focal points of host countries.</p> <p>The project page discloses the projects documentation including the HCA signed following the conditions established by BioCarbon and informed through the Avoiding Double Counting (ADC) tool.</p> <p>The Handbook and Good Practices Registry Platform, section 7. VCC Additional characteristics explain how the different compliance periods are discriminated for the eligible VCC issued by projects register in BioCarbon.</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 aligned to best practices are described in the Handbook and Good Practices Registry Platform.</p> <p>The BCR Standard Operating Procedures (SOP) Informs about general process taking place in BioCarbon and how those are link to the registry platform to ensure effective implementation of program provisions.</p> <p>The attachment to this <i>Emissions Unit Programme Registry Attestation</i> includes more snapshots of how the user experience.</p>	

7.4	<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>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>The registry administrator is responsible for cross-checking that prior to use or retirement of VCC under CORSIA, the VCC issued are covered under the authorization of the corresponding host country (and evidence uploaded to the system). Also, the registry platform can confirm prior acceptance of retirement that the crediting period by VCC issued by projects corresponds to the compliance period under CORSIA for which it is requested.</p> <p>Complementary information can be consulted on the Handbook and Good Practices Registry Platform and the attached file.</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 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 issuance • 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. When the retirement is accepted by the administrator, it is automatically disclosed in the public registry: https://globalcarbontrace.io/transactions</p> <p>The serial number 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. • VCC destination. 	

	<p>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 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>☒ YES</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>☒ YES</p>
<p>7.5</p>	<p>Describe how the Registry does or will implement these provisions:</p> <p>a)</p> <p>The Program Registry may display on the public website the account holder's cancellations of CORSIA Eligible Emission Units. This is possible in the terms of 1-3 business days, or less, after receiving formal instructions from a duly authorized representative of the account holder. The registry administrator commits to verify the necessary information to ensure that VCC eligible and supported information is hold by the project holder prior to authorizing retirement under CORSIA.</p> <p>This period does not include anticipated system downtime (should it occur) or if an event occurs that is beyond the control of the registry administrator.</p> <p>b)</p> <p>The Global CarbonTrace (GCT) Registry is completely self-managed. Every transaction performed by an account holder on GCT is updated in real time. When a user conducts a retirement action on the platform, the transaction is automatically completed by the system according to the information provided by the account holder on the platform. Furthermore, the information about the transaction is automatically published and can be viewed by any interested party in the accounting section of each project.</p> <p>Additionally, the platform allows public users to download a report of all retirements on the platform. This report can be accessed from the Projects page at https://www.globalcarbontrace.io/projects. If there is a need for a transaction confirmation from CORSIA, this process can also be implemented. At the same time, the retirement information will include all the fields specified in Annex 16, Volume IV.</p> <p>In addition, in order to complete a retirement, the Account Holder shall verify all information related to the batch of VCC, vintage, amount, and fill out a form that includes details about the beneficiary of the offsetting. The full contents of these procedures can be found in the Section 6, Retirement and Transfers of the Handbook and Good Practices Registry Platform.</p> <p>Once a retirement is authorized and effectively 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 issued 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 criteria. 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>https://globalcarbontrace.io/</p> <p>https://globalcarbontrace.io/projects</p> <p>https://globalcarbontrace.io/carbon-credits</p> <p>https://globalcarbontrace.io/transactions</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?	<input checked="" type="checkbox"/> YES
7.6	Describe how the Registry does or will implement this provision:	
	As the Registry administrator of BioCarbon (Global CarbonTrace), we affirm our commitment to supporting CORSIA participants in their reporting obligations. The 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 including documentation related to project and VCC.	
	Once a retirement is authorized CORSIA participant account holder will receive to the registered e-mail a unique and secure <i>Retirement Statement</i> , including all relevant information of project and VCC retired. The document is also available in the user interface of the registration platform as well it is available the certificate emitted by Blockchain.	
	The GHG project information is already public accessible through the project page in the public registry. Nevertheless, as it is informed on the in the Handbook, user have a directly communication channel with the registry administrator in case of problems during the interaction with the system, request of support and orientation or, request additional information.	
	The participant account holder or their designee has the possibility to request report(s) generation containing the information specified for the purpose of compliance with the CORSIA requirements. See reference to user interface and main menu in section 8. Handbook and Good Practices Registry Platform .	
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 Handbook and Good Practices Registry Platform V4 .		

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

<p>f. Do such security features (rows a – e) meet and undergo periodic updates in accordance with industry best practice?</p>	<p><input checked="" type="checkbox"/> YES</p>
<p>Describe how the Registry implements each provision in rows a – f:</p>	
<p>a)</p> <p>The software architecture of GCT incorporates various security mechanisms based on the best practices of the ISO27000 group and the OWASP (The Open Web Application Security Project). The application's configuration utilizes network security mechanisms, and the information is further protected through encrypted databases using distributed ledger technology. The characteristics of this technology relate to data decentralization, transaction validation by peers, immutable record-keeping, and the use of consensus mechanisms.</p> <p>The Registration Platform was developed with secure code policies consider. The specific provisions are described in the Handbook and Good Practices Registry Platform, section 11. Registry platform's security and Information about security systems is disclosed in the BCR Standard Operating Procedures (SOP).</p> <p>The Registry system has a secure access system since, from the moment of opening an account, the following security parameters are followed:</p> <ul style="list-style-type: none"> ▪ 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) <p>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.</p>	

b) Yes, GCT Registry can disclose such information upon request.

General information regarding cyber security is describe on the GCT website and [Handbook and Good Practices Registry Platform section 11](#).

c) Yes, utilize appropriate method(s) to authenticate the identity of each user accessing an account.

Before getting access to the Registration system, users shall register for request 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.

Each registry user has a password to log into the GCT Registry. During any transaction, such as transfers and retirements, or when there is a change in project state that requires a signature, the GCT Registry will confirm the process, a dynamically created OTP (One Time Password) is sent through email or SMS. This good practice helps to avoid fraud, impersonation, and phishing.

The GCT team performs validations on each new account ensure all document and declaration have been uploaded and signed by the legal representative. Moreover, during the process strong KYC procedures takes place, following provisions consider in the anticorruption and antibribery policy of BioCarbon.

The Registry undergone through continuous monitoring of the transactions carried out by clients, to verify that good practices are being complied. In addition, the software considers the security of the Registry through the following components which are full describe in the [Handbook and Good Practices Registry Platform section 11](#).

- 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 policies¹⁰: 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) Yes, the GCT Registry grant each user access only to the information and functions that a user is entitled.

GCT Registry allows users to create different account types with varying permissions based on their needs. These account types consist of general accounts, project owners, and brokers. When using the platform, each

¹⁰ Open Web Application Security Project

	<p>account type has distinct roles, such as creating projects, receiving credits, and transferring or retiring them. Within any one account, the account administrator can configure user permissions based on the desired functionality required by the company. Each user will have access to the registry system's information based on their account type and granted permissions.</p> <p>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 therefore 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.</p> <p>e) Yes, the GCT Registry performs actions only upon command activation by the GCT Registry user. It is designed to be user-friendly, promoting intentional and aware actions. The GCT Registry generates OTPs (One Time Passwords) via email or SMS for transactions involving transfer, retirement, or a change in project state signature.</p> <p>In this way, any possible event related to the registry system (request the registration of account project holders, register projects, issue of Verified Carbon Credits-VCC, transfers and retirements), shall be confirmed by the user by checking a checkbox to complete the action.</p> <p>Finally, 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).</p> <p>f) Yes, GCT Registry have security features that meet and undergo periodic updates in accordance with industry best practice. As a technology company, the technical team of GCT, consistently updates and certifies themselves in the latest industry developments and technologies to provide efficient, safe, and reliable services.</p> <p>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.</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>Details of cyber security provisions are described in the 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.</p>
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7.8	<p>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?</p>	<p><input checked="" type="checkbox"/> YES</p>
	<p>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?</p>	<p><input checked="" type="checkbox"/> YES</p>

	<p>Describe how the Registry does or will implement each provision in rows a and b:</p> <p>a) Yes.</p> <p>GCT provide the documents and functionalities that regulate the connection between the platform administrator and the user. Platform users shall accept the terms and conditions and a Framework Contract that regulates the responsibility for providing the service, users service levels, platform availability, error management, and other elements by GCT Registry. The commitment between the platform administrator and the service users is precisely identified there. This commitment is essential to ensure continuous communication and effectively manage potential security and integrity breaches of the system.</p> <p>GCT Registry prioritize the security and integrity of all data within the Registry. In the event of any breach that affects a CORSIA participant account holder or their designee, we are committed to promptly notifying the parties involve.</p> <p>GCT Registry 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 registry 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. It also includes asses the level of risk for other users in the system and take precautionary measures among users including CORSIA participants.</p> <p>b) The Registration Platform administrator will notify immediately to BioCarbon and communicate to ICAO secretariat informing about any action required and details of the incident. Additionally, GCT offers a hotline to resolve doubts and concerns of the users of the registration platform. A formal communication channel will be established with the ICAO Secretariat to effectively execute procedures for notification upon any improbably situation breach of Programme Registry data.</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 Handbook and Good Practices Registry Platform</p> <p>See more information in the Annex - Attached to this format.</p>
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7.9	<p>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 IV¹¹?</p>	<p><input checked="" type="checkbox"/> YES</p>
	<p>Describe how the Registry implements these provisions:</p> <p>The retired units from the GCT Registry are always made public on the website, and the retirement process cannot be reversed or changed once it is confirmed. This statement can be fully ensured using blockchain technology.</p>	

¹¹ 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>The retirement process in the GCT Registry enables users to indicate the unit's specific use based on their market type. CORSIA participants can select CORSIA as the reason for using carbon offsets to fulfil offsetting requirements. The GCT Registry permits CORSIA members to access transaction details for customized retirement units.</p> <p>In this way, when an account holder requests for a retirement transaction, they shall specify the purpose of the units (destination). The retirement of VCCs is a non-reversible operation since the VCC retired are automatically deducted from the registry system. In consequence, those units are not anymore available in the market thus 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 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://globalcarbontrace.io/carbon-credits</p> <p>Also information about retirements is accessible through the website: https://globalcarbontrace.io/transactions</p>

7.10	<p>a. Does the Programme Registry ensure that all cancellation information on its website is presented in a user-friendly format?</p>	<input checked="" type="checkbox"/> YES
	<p>b. Does the Programme Registry ensure that all cancellation information on its website is available at no cost and with no credentials required?</p>	<input checked="" type="checkbox"/> YES
	<p>c. Does the Programme Registry ensure that all cancellation information on its website is capable of being searched based on data fields?</p>	<input checked="" type="checkbox"/> YES
	<p>d. Does the Programme Registry ensure that all cancellation information on its website can be downloaded in a machine-readable format, e.g., .xlsx?</p>	<input checked="" type="checkbox"/> YES
	<p>Describe how the Registry implements each provision in rows a – d:</p> <p>a) Yes.</p> <p>The GCT Registry platform has been developed in a user-friendly manner. The accountability page of the project displays all the information about each retired VCC, including the following details: quantity, initial and end serial numbers, destination, units' applicability, end-user, and date. The supporting documentation and vintages are available for direct access on the registry website.</p> <p>The format for transactions and retirements is presented in an easy-to-understand manner and provides information about the transaction/retirement date, the project for which the VCCs are being retired, the account holder, the amount of credits retired, and the initial and final serial and serial ID. This information is available in this link: https://globalcarbontrace.io/transactions</p> <p>b) Yes.</p> <p>The details of the carbon units' retirements can be accessed by any public user of the platform, without any credentials and at no cost.</p> <p>The content can be easily accessed by simply clicking on the provided link (above). This allows anyone, regardless of their technical expertise, to conveniently view the information. By clicking on the link, users</p>	

	<p>will be directed to the webpage or document where the content is hosted, ensuring a seamless and user-friendly experience. This accessibility feature ensures that the information is readily available to a wide audience, promoting inclusivity and ease of use.</p> <p>c) Yes.</p> <p>Data field are part of a searching system to identify the cancelled units considering project, project holder or serial ID.</p> <p>The GCT Registry website offers a comprehensive platform for searching retirement information based on various data fields. Users can easily access and retrieve specific retirement details by utilizing the search functionality available on the website. This feature enables users to refine their search results by applying specific filters. By using the data fields available on the GCT Registry website, users can easily find the retirement information they require, ensuring a consistent and user-friendly experience.</p> <p>d) Yes.</p> <p>All retirement information as Credits available by project can be downloaded in PDF or Excel format.</p> <p>The website and downloadable files serve as resources for accessing public information on projects, VCC (Verified Carbon Credit) issuances, retirements, and their respective locations. This information can be reviewed for individuals, organizations, and researchers interested in understanding the progress and impact of these projects.</p> <p>By providing easy access to the referred details, the website and downloadable files facilitate transparency and enable stakeholders to stay informed about the latest developments in the GCT Registry. Additionally, those mechanisms of public information ensures that users may access and analyze the information offline, making it convenient for those who may not have continuous internet access or prefer to work with the data in their own time.</p> <p>If the CORSIA audit team requires a specific account for auditing processes, they can download all this information in Excel (.xlsx), CSV, or PDF format.</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>https://globalcarbontrace.io/transactions</p>

7.11	<p>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?</p>	<p><input checked="" type="checkbox"/> YES</p>
	<p>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?</p>	<p><input checked="" type="checkbox"/> YES</p>
	<p>Describe how the Registry does or will implement each provision in rows a and b:</p>	
	<p>a) Yes.</p> <p>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>	

	<p>The GCT Registry is dedicated to protecting data as a repository of information on GHG projects and VCCs. The arrangement between GCT Registry and BioCarbon establishes the information and data of the projects and VCCs will be stored and secured by the registry platform for a minimum of 10 years from the date of project registration.</p> <p>b) Yes.</p> <p>As described in the BioCarbon Long-Term Plan document, in case of dissolution the program and its registry administrator will take measures to do one year transition of projects, VCC and documentation to another Registry or Platform without affecting the operation of the registry.</p> <p>In addition to the storage and protection of project documents and data, the agreement between GCT Registry and BioCarbon also outlines the procedures in the event of dissolution by either party. In such a scenario, GCT Registry is responsible for certifying all available information up to that point. This certification ensures that the project's data and documents are properly accounted for and can be accessed by relevant stakeholders even after the dissolution. This provision highlights the commitment of both parties to transparency and accountability in managing project information.</p> <p>The date of operation should be accessible to all users, and data migration should be ensured. 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 unforeseen dissolution of the program.</p>
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