

CORSIA Eligible Emissions Unit Programme Change Notification Form

Version 2.0; Effective from 10 January 2022

PART A: ABOUT THIS FORM

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

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

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

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

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

PART B: PROGRAM CHANGE NOTIFICATION(S)

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

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

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

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

Programme name: Gold Standard

CHANGE 1 – Gold Standard registry information security management system, or equivalent security enhancements, including procedures for periodic audits
a. Description of the change (e.g., the addition, modification, deletion undertaken):
<p>Gold Standard is submitting evidence of compliance with CORSIA’s criterion <i>Identification and Tracking</i>, and its guideline that “The programme should have provisions in place ensuring the periodic audit or evaluation of registry compliance with security provisions. Annexed to this material change form are:</p> <ol style="list-style-type: none"> 1. Letter from the CEO of Algorithmic Intelligence Pte Ltd., the corporation responsible for maintenance, support and enhancement of the Gold Standard Impact Registry. This letter outlines the security policies and practices of the corporation, including the application of regular security audits with respect to the Gold Standard Impact Registry. (Annex A) 2. Letter from the COO of Abilene Advisors, contracted by Gold Standard to assist on matters related to information security. The letter includes reference to Gold Standard’s intent to achieve compliance with ISO/IEC 27001:2022 and Abilene Advisors’ commitment to support this. (Annex B) <p>Both documents are considered business-confidential and therefore should be treated accordingly.</p>
b. Rationale for the change:
<p>Gold Standard seeks to demonstrate compliance with the ICAO Council’s condition for eligibility for Phase 1 of CORSIA, related to Identification and Tracking.</p> <p>In its March 2024 Decision, the ICAO Council specified that Gold Standard should take action to “complete the process for ISO/IEC 27001 certification for the Gold Standard registry information security management system, or equivalent security enhancements, including procedures for periodic audits.”.</p> <p>Gold Standard notes that ISO/IEC 27001 is a standard related to organisation-wide management of information security, and therefore its scope and the steps required for compliance go beyond our management of the Gold Standard Impact Registry. With respect to the Impact Registry, the evidence set forth in the annexed letter from Algorithmic Intelligence Pte Ltd outlines how Gold Standard meets CORSIA’s criterion for Identification and Tracking and its supporting guidance, through the application of regular security audits and other measures that represent equivalent security enhancements.</p>
c. Where the change is reflected in the Programme’s documentation or other resource(s) ⁴ :
This update is not reflected in Programme documentation, but evidence is provided in the annexed letters described above. As outlined above, both letters are considered business-confidential.
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response

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

to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

Gold Standard has previously submitted information to CORSIA with respect to its criterion for Identification and Tracking, in its original application, in evidence provided as part of its Material Change notification in August 2023, and in response to subsequent clarification questions.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

Gold Standard would submit its latest information and procedures on information security as part of any future re-assessment process.

CHANGE 2 – Reversal compensation procedures

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Gold Standard has revised its PERFORMANCE SHORTFALL – GUIDELINES, REQUIREMENTS AND PROCEDURE to reflect that reversals of mitigation issued as CORSIA-eligible emissions units will only be replaced/compensated by emissions units that are also fully eligible for the same CORSIA compliance period

b. Rationale for the change:

Gold Standard seeks to comply with the ICAO Council’s condition for eligibility for Phase 1 of CORSIA, to clarify in Gold Standard’s reversal compensation procedures that the programme will ensure that reversals of mitigation issued as CORSIA-eligible emissions units will only be replaced/compensated by emissions units that are also fully eligible for the same CORSIA compliance period

c. Where the change is reflected in the Programme’s documentation or other resource(s)⁵:

In paragraph 4.5.5 of [Performance Shortfall – Guidelines, Requirements and Procedure v2.1.](#)

Track change version of the document is available [here](#).

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

Gold Standard has previously submitted its Performance Shortfall – Guidelines, Requirements and Procedure v2.0 as part of its Application Form and its re-assessment, and has notified updates to the Performance Shortfall – Guidelines, Requirements and Procedure (v2.0) as a material change in August 2023.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

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

The changes have been made following consultation with Gold Standard’s Technical Advisory Committees and publication of a revised version of the Requirements on Gold Standard’s website. We request that the TAB and ICAO Council consider these updates as they assess whether to change Gold Standard’s programme eligibility under CORSIA’s First Phase from Conditionally Approved to Approved. This latest version, unless further revised, will also be submitted for any future assessment processes.

CHANGE 3 Procedures necessary to prevent double-claiming

a. Description of the change (e.g., the addition, modification, deletion undertaken):

Gold Standard has revised its GHG Emissions Reduction & Sequestration Product Requirements to revises its procedures for assuring consistency between information in the Gold Standard Impact Registry and national reporting, including with respect to authorisations, accounting and corresponding adjustments. The update also includes revisions to provisions to manage instances of GS VERs used towards CORSIA being double-claimed with host country’s NDCs.

b. Rationale for the change:

Gold Standard seeks to comply with the ICAO Council’s condition for eligibility for Phase 1 of CORSIA, that Gold Standard “develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant Guidelines, mindful of TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement contained in the document *Clarifications of TAB’s Criteria interpretations*”.

Gold Standard wishes to note that as a result of these changes, the below condition set by the ICAO Council in March 2024 is no longer relevant. This is as Gold Standard has assumed responsibility for verifying information on host country attestations and reporting, under the revisions made.

- i. *Procedures for the programme to verify that the information on host country attestations and reporting is obtained and submitted by project owners, and is accurate and timely; and that the programme will respond to instances of non-responsiveness / inaction / inaccuracies in reports submitted by a project owner in regard to these information requirements;*

c. Where the change is reflected in the Programme’s documentation or other resource(s)⁶:

Annex A to [Gold Standard’s GHG Emissions Reduction & Sequestration Product Requirements](#) (“Product Requirements”), with the primary relevant changes in:

- Paragraphs 1.2.1 and 1.2.2
- Paragraphs 1.4.1 – 1.4.6
- Paragraph 1.5.5 and Figure 1

Track change version of the document is available [here](#).

d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme’s current eligibility:

⁶ If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

Gold Standard has previously submitted its Product Requirements as part of its Application Form and its re-assessment, and has notified updates to the Product Requirements as a material change in August 2023.

e. How the information in “d.” would be revised and submitted to any future (re-)assessment process, by updating the information in “d.” to reflect any / all modifications to the Programme’s original information that result from the change:

The relevant sections of Gold Standard’s Product Requirements have not yet been deemed by the Technical Advisory Body to be fully consistent with the contents of the criterion *Only counted once towards a mitigation obligation*. Through these latest revisions, Gold Standard has taken steps to ensure full technical consistency.