

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

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

(Version 6, January 2024)

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SECTION I: ABOUT THIS ASSESSMENT

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. 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 interested 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). The assessment process will involve collecting information from each programme through this programme application form and supplementary materials and requested evidence.

Through this assessment, the TAB will develop recommendations on the list of eligible emissions unit programmes (and potentially project types) for use under the CORSIA first phase, which will then be considered by the ICAO Council.

This form is accompanied by, and refers to, Appendix A "*Supplementary Information for Assessment of Emissions Unit Programmes*", containing the EUC and *Guidelines for Criteria Interpretation*. These EUC and Guidelines are provided to inform programmes' completion of this application form, in which they are cross-referenced by

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/TAB2022.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>

paragraph number.⁵

This form is also accompanied by Appendix B “*Programme Assessment Scope*”, and Appendix C “*Programme Exclusions Scope*”, which request all 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 application, “*Emissions Unit Programme Registry Attestation*” in line with the instructions contained in Appendix D. 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 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: The working language of the assessment process is English. Translation services are not available for this process. 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 application, and any supporting evidence or clarification provided by the applicant including information designated as “business confidential” by the applicant, 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 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

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-](https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/ClarificationsofTABsCriteriaInterpretations.pdf)

[protection/CORSIA/Documents/TAB/TAB2023/ClarificationsofTABsCriteriaInterpretations.pdf](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)”)

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 form, including accompanying evidence and with required appendices, through the ICAO CORSIA website no later than close of business on **04 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 are derived from the CORSIA emissions unit eligibility criteria (EUC) and any *Guidelines for Criteria Interpretation* introduced in Section I (above). To help inform the programme's completion of this form, 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”](#).

Application Form completion

The programme is expected to respond to all questions in this application form at the time of application submission. TAB cannot initiate its assessment of applications 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 application's assessment.

A “complete” response involves three components: 1) a written summary response; 2) supporting evidence; and 3) programme revisions, where an applicant is considering or undertaking revisions to a programme procedure in question.

- 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) **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).

Application and assessment scope

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:

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 the programme **is submitting for TAB’s assessment** of CORSIA eligibility; 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 the programme **is not submitting for TAB’s assessment** of CORSIA eligibility, which *are not* described in this form; as well as the specific methodologies, protocols, and/or framework(s) associated with these programme elements.

Emissions Unit Programme Registry Attestation

In **Appendix D** “*Emissions Unit Programme Registry Attestation (version 2, January 2022)*”, the programme should provide the information relating to programme registry functionality that is referred to in the attestation and its attachment. Both the programme representative of an emissions unit programme, and the administrator or authorized representative of the registry designated by the programme, should review and attest to the accuracy of this information and their acceptance of the terms, preferably at the time of application.

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 methodologies⁷. **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.

⁷ Note that any applicant may use different terminology. For example, a programme may refer to a “methodology” as a protocol or framework.

Disclosure of programme application forms and public comments

Applications, including information submitted in Appendices B, C, and D, as well as other information submitted by applicants will be publicly available on the ICAO CORSIA website, except for materials which the applicants designate as business confidential. The public will be invited to submit comments on the information submitted, including regarding consistency with the 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: APPLICATION FORM

PART 1: General information

A. Programme Information

Programme name: [Puro.earth](#)

Administering Organization⁸: [Puro.earth Oy \(Limited Liability Company registered in Finland\)](#)

Official mailing address: [P.O. Box 1188, 00101 Helsinki, Finland](#)

Telephone #: [\(+358\) 40 5858848](#)

Official web address: [Puro.earth - carbon removal standard and registry](#)

B. Programme Administrator Information

Full name and title: [Antti Vihavainen, CEO](#)

Employer / Company (*if not programme*): [Puro.earth Oy](#)

E-mail address: Antti@puro.earth

Telephone #: [\(+358\) 40 5858848](#)

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

Full name and title: [Marianne Tikkanen, Head of Standard](#)

Employer / Company (*if not Programme*): [Puro.earth Oy](#)

E-mail address: Marianne@puro.earth

Telephone #: [\(+358\) 50 439 7779](#)

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:

[Puro.earth Leadership Team](#)

[Antti Vihavainen, Chief Executive Officer](#)

[Marianne Tikkanen, Head of Standard](#)

[Benno Fuchs, Chief Operating Officer](#)

[Helen Bray, Vice President Policy](#)

⁸ Name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme, *if different from "Programme Name"*.

Alvin Lee, Head of Asia-Pacific (APAC)

Joseph Kochanski, Head of Operations, Americas

Joona Kunnas, Regional Head, Europe, Middle East, and Africa (EMEA)

The Puro.earth Leadership Team is listed here: [About us - Puro.earth](#)

Board of Directors

Fredrik Ekström (Senior Vice President - Head of Nasdaq Stockholm), Chairman

Eve Tamme (Founder and Managing Director - Climate Principles), Independent Board Member

Jan Willem Bode (Independent consultant), Independent Board Member

Roland Chai (Nasdaq)

Pall Hardarson (Nasdaq)

Randall Zuccalmaglio (Nasdaq Ventures)

Mats Persson (Fortum)

The Board of Directors is listed here: <https://puro.earth/board/>

Independent Advisory Board

The Advisory Board's mandate is to ensure high credit-level integrity and robust principles for science-based high-quality carbon removal verification.

Chairman: Professor Myles Allen, Professor of Geosystem Science, Department of Physics, University of Oxford

Secretary: Mr. Grant McKelvey, Office of general Counsel, Nasdaq

Ms. Nikki Batchelor, Director, XPRIZE Carbon Removal

Dr. Mai Bui, Senior Research Associate Centre for Environmental Policy, Imperial College

Mr. Todd Flach, Senior Advisor for CCS, Bellona

Dr. Florian Kraxner, International Institute for Applied Systems Analysis (IIASA)

Professor Ali Mashayek, University of Cambridge

Members of the Advisory Board are listed here: <https://puro.earth/governance/>

Weblink to the [Advisory Board Terms of Reference](#)

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.

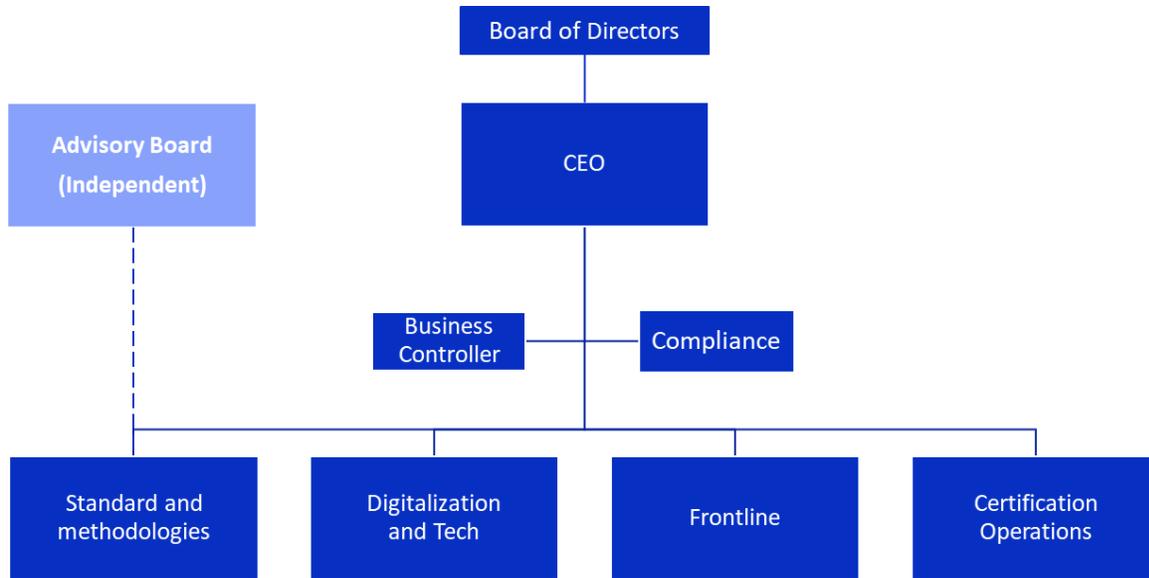


Figure 1. Organization of Puro.earth business units

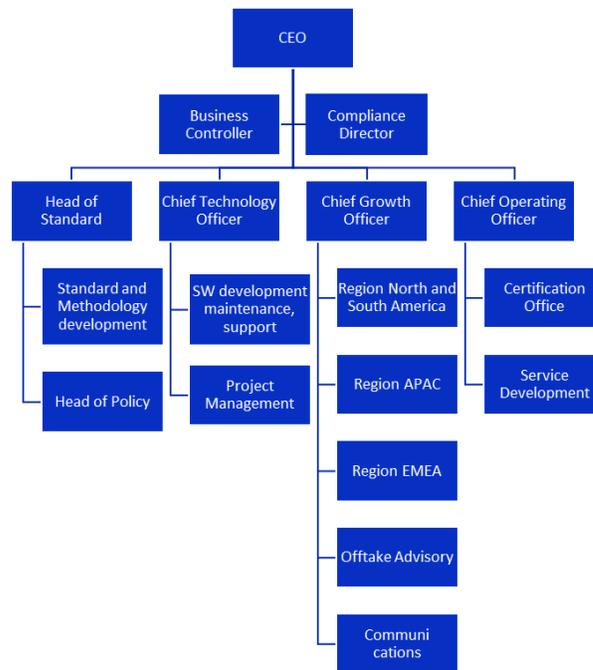


Figure 2. Puro.earth organizational structure.

PART 2: Programme summary

Provide a summary description of your programme

Puro Standard and Registry is a global programme to certify **engineered carbon removals**. We started operations in 2019. Nasdaq became the main investor in June 2021 to enable the scale up of the programme. By January 2024, the programme has issued over 500,000 units known as CO2 Removal Certificates (CORCs) to suppliers that have stored carbon durably. Puro certification requirements focus on robust carbon accounting, permanence of stored carbon and safety for people and the environment. We certify carbon removals, which deliver the “net” in net-zero emissions, the global goal of the Paris Agreement (Article 4 https://unfccc.int/sites/default/files/resource/parisagreement_publication.pdf).

The certified projects are in 5 continents and across several durable carbon removal pathways, such as biochar, mineralization, enhanced weathering, and geological storage. <https://puro.earth/>. The Puro Registry has currently over 100 CO₂ removal projects registered and almost 800 projects in the pipeline in varying degrees of maturity. <https://carbon.puro.earth/CORC-co2-removal-certificate/supplier-listings>

Puro Registry (<https://registry.puro.earth>) tracks units (CO2 Removal Certificates (CORC)) from issuance to retirement. We were the first registry to offer full transparency to retirements (the use claims) of units. We also offer a downloadable history of all retirements, which has been welcomed by press and analysts. <https://registry.puro.earth/carbon-sequestration/retirements>

The Puro Standard document library holds the Methodologies and General Rules of the crediting program <https://puro.earth/documents/>. The methodologies are developed by the programme together with stakeholders. The guiding principles of establishing new methodologies are scientific quantification, secure long-term storage, and robust environmental and social safeguards. Once established by the working groups, the methodologies undergo public consultation and a final approval by an independent scientific Advisory Board chaired by Professor Myles Allen from the Oxford University <https://carbon.puro.earth/about?p=puro-advisory-board>.

Puro Registry will include the new labels for CORSIA eligible credits, and the host country authorisations as defined in the Article 6 Procedures. This software update is planned to be ready by end of Q2. https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth_Article-6-procedures.pdf.

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*⁹ 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*)

Puro Standard Methodologies are in place and disclosed for use on our website. The first carbon removal methodologies were developed in 2019 by the programme together with stakeholders.

Weblink to the Methodologies: [Document library - Methodologies \(puro.earth\)](#)

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

Methodologies are developed by the programme together with independent external experts. The methodologies are revised every two years or more frequently, when needed. The Methodology new or revised drafts undergo a public consultation, and the final draft is approved by the independent scientific Advisory Board chaired by Professor Myles Allen from Oxford University.

⁹ 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*”.

The guiding principles and requirements as well as the process for developing methodologies are introduced in clause 1.3.5 and 1.3.6 of the General Rules (weblink: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)), and expanded in greater detail in the Methodology Development Requirements (weblink: [Puro_Method_Dev_Req.pdf \(hubspotusercontent-na1.net\)](#)). The greenhouse gas (GHG) quantification process follows the International Organization for Standardization (ISO) 14064 (2019) “Part 2: Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements”. Below we summarize this process:

The process for developing Methodologies in the Puro Standard can take any of these three paths:

1. A methodology review process is focused on existing Methodologies in the Puro Standard. This process shall take place every two years for revisiting conformity with regulatory demands, scientific advancement, and new business practices that could lead to enhancement of CO₂ removals quantification and qualification Methodologies. At the start, the Programme (Issuing Body) assigns an internal team to conduct this review and its findings are presented to the independent Advisory Board to decide on next steps. The review can lead to a Methodology revision process which provides a revised draft of the Methodology to incorporate new information and/or clarify parts of an approved Methodology based on the review findings. The draft revision is submitted for a 30-day Public Consultation. All feedback will be collected, addressed, incorporated into a final draft as needed, and made publicly available. A final revised draft will then be submitted to the independent Advisory Board for approval. The approved revised Methodology will be published in Document library for use (weblink: [Document library - Methodologies \(puro.earth\)](#)).
2. A new methodology development process seeks to develop a new CO₂ removal pathway not currently available in the approved Methodologies of Puro Standard. To this end, the Issuing Body assigns an internal scientific team the task of elaborating a draft Methodology with the assistance of a working group composed of external experts in the field. The draft Methodology shall be submitted for a 30-day Public Consultation. All feedback will be collected and made publicly available. A final revised draft will then be submitted to the Advisory Board for approval. The approved Methodology will be published in the Document Library.
3. The assessment of an external third-party Methodology for use with the Puro Standard follows a similar process as described in the Methodology Review. The team conducts a review assessing:
 - a. A material difference in focus or scope between the external Methodology and approved CO₂ removal Methodologies.
 - b. The compliance of the external Methodology with the Puro Standard General Rules.
 - c. The findings of this process are presented to the independent Advisory Board in an assessment report. The Advisory Board may approve the use of the external Methodology within the Puro Standard. Alternatively, the Advisory Board may provide suggestions that the Methodology developer could consider making the Methodology compliant with the Standard and be re-submitted for approval.

Weblink to the Methodology Development Requirements:
[Puro_Method_Dev_Req.pdf \(hubspotusercontent-na1.net\)](#)

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

The programme’s governance process that regulates Methodology development and approval can be found in the Puro General Rules, starting from clause 1.3.3 to clause 1.3.6, which all read as follows:

“1.3.3 The Advisory Board may request revision to the Puro Standard and Methodologies as necessary. A review is requested when either an Advisory Board Member or Puro.earth management deems that significant changes have occurred in regulations, technologies, carbon accounting, or other provisions.

1.3.4 Should the review result in material revisions and/or new Methodologies, they shall be sent to public consultation before approval. Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter. Stakeholder comments are considered, and consultation results are published on the same website.

1.3.5 Methodologies are normative documents specifying the rules and procedures that CO2 Removal Suppliers need to follow and comply with to be issued CORCs. The Methodology development process described in the Methodology Development Requirements involves the creation of a scientific independent expert group that prepares the draft text to be sent for public consultation and then Advisory Board approval.

1.3.5.1 The principles that guide methodological development are:

- i. Scientifically sound, conservative quantification of climate impact.
- ii. Safety, environmental, and social safeguards.

1.3.5.2 The Methodology shall address the following components:

- i. Applicability or eligibility criteria of the Puro Standard and those specific to the CDR process.
- ii. Determination of the accounting boundary and quantification of Greenhouse Gas removals and emissions.
- iii. Determination of the baseline scenario.
- iv. Determination of additionality.
- v. Determination of leakage.
- vi. Expectation of storage duration (i.e., permanence) and risks of reversals.
- vii. Definition of uncertainty in calculations and assumptions.
- viii. Mitigation of environmental and social safeguards.
- ix. Determination of positive Sustainable Development Goals (SDG) impacts.
- x. Monitoring practices, roles, and responsibilities.

1.3.6 External methodologies can be submitted for Advisory Board approval.

Weblinks to evidence

- Puro Standard Methodologies, existing and discontinued: <https://puro.earth/methodologies/>
- Public Consultations on Methodologies, Ongoing and closed: <https://puro.earth/public-consultation/>
- Puro Standard General Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)
- Puro Standard Methodology Development Requirements: [Puro_Method_Dev_Req.pdf \(hubspotusercontent-na1.net\)](#)
- ISO 14064 Part2 (2019) <https://www.iso.org/standard/66454.html>
- Advisory Board Terms of Reference: [Terms of Reference Puro Advisory Board.pdf \(hubspotusercontent-](#)

[na1.net](#))

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*)

Under the Programme activities are project based as established in clause 2.1 of Puro's General Rules.

"2.1 PROJECT DEVELOPMENT

2.1.1 A CO2 Removal Supplier develops a **project** with the purpose of sequestering and storing carbon durably." (emphasis added).

Weblink to General Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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

There are no geographical restrictions under the Puro Standard, and since the activities are project based there is no sector consideration. At the date of submission of the application Puro.Earth counts with 5 approved methodologies that could be equated to the concept of project types, namely:

1. **Biochar** (weblink [Puro.earth Biochar Methodology.pdf \(hubspotusercontent-na1.net\)](#)):
A very stable, solid form of carbon that can endure in soil for thousands of years, making it an ideal technology for scalable carbon removal.
It has multiple commercial uses at potentially industrial volumes, for example, as greenhouse additive, in soil regeneration and in wastewater treatment. It is produced from biomass or biowaste, through pyrolysis (heated in the absence of oxygen).
2. **Carbonated Materials** (weblink [Puro.earth Carbonated Materials Methodology.pdf \(hubspotusercontent-na1.net\)](#)):
Manufactured carbonated materials that remove more CO2 than the production emits. By reacting with CO2, these materials form carbonates, thereby trapping and storing the carbon dioxide for 1,000+ years. This process offers the potential for the utilization of industrial byproducts and waste materials such as steel slag, mine tailings and alkaline wastes, reducing their environmental impact while creating value through carbon removal.
3. **Enhanced Rock Weathering** (weblink [Puro.earth Enhanced Rock Weathering Methodology.pdf \(hubspotusercontent-na1.net\)](#)):
Enhanced rock weathering is a process that aims to accelerate natural rock weathering where carbon dioxide reacts with rocks, a process that usually takes thousands of years. Silicate weathering begins with the reaction between water, carbon dioxide and silicate rocks which breaks down the rock. Puro.earth has developed the world's first carbon crediting methodology for Enhanced Rock Weathering.

4. **Geologically Stored Carbon** (weblink [Puro.earth_Geologically_Stored_Carbon_Methodology.pdf \(hubspotusercontent-na1.net\)](#)):

Carbon capture processes such as DACCS, BECCS and Bio-CCS combined with geological storage, such as direct injection of CO₂ into deep geological formations, offer a permanent carbon removal pathway. Puro.earth's Geologically Stored Carbon methodology does not cover capturing CO₂ from fossil fuels, only from biogenic sources or directly from the atmosphere.

5. **Terrestrial Storage of Biomass** (weblink [Puro.earth_Terrestrial_Storage_of_Biomass_Methodology.pdf \(hubspotusercontent-na1.net\)](#)):

Terrestrial Storage of Biomass is an innovative approach that offers a unique opportunity for large scale, affordable and fully additional carbon removal. The methodology covers activities capable of burying woody biomass under conditions that inhibit biomass decomposition and can maintain those conditions for containment of the stored carbon for at least 100 years. The eligible activity must be net-negative in terms of the overall carbon footprint.

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) and (b) The program provides procedures in place to support the development of project-based methodologies (weblink: [Puro_Method_Dev_Reg.pdf \(hubspotusercontent-na1.net\)](#)). Evidence is provided above. It includes a link to each of the five (5) Puro approved Methodologies. Each Methodology includes their eligibility criteria based on the type of CO₂ removal activity.

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) Yes, the programme has procedures in place defining how offset credits (i.e., CORCs) are **issued** under clause 3.2 of the General Rules. The relevant clauses are:

3.2.1. CORCs are only issued to a certified Production Facility associated to a Registry Account held by an approved Account Holder.

3.2.2 CORCs are always issued based on an Output Audit Report for a specified Monitoring Period for a certified Production Facility quantifying the Net CO₂ Removal. The CO₂ removal and the greenhouse gas emissions are quantified using the rules defined in the corresponding Methodology.

3.2.3. CORCs are issued to certified Production Facilities that have been verified to meet the requirements set in Chapter 6 and in the applicable Methodology.

3.2.4. A CORC represents a volume of 1 (one) metric ton of Net Carbon Dioxide Removal stored Long Term.

3.2.4.1 Each CORC shall specify the following Attributes:

- i. Unique identifier.
- ii. Issuance Date.
- iii. CO₂ Removal Methodology and its version.
- iv. CORC₁₀₀₊ or CORC₁₀₀₀₊ label to communicate the storage durability of the Methodology.
- v. Production Facility identity, name, and location of the Production Facility.
- vi. Host country and sector of the Production Facility.
- vii. Monitoring Period first and last dates of the Output Report.
- viii. Specific information as may be specified in the corresponding Methodology.
- ix. Other Attributes as required.

3.2.5. To initiate the process of CORC Issuance, a CO₂ Removal Supplier with a certified Production Facility sends an Output Report to the Issuing Body based on an annual basis as described in the Monitoring Plan.

3.2.6 The CO₂ Removal Supplier selects the issuance method from the options a) or b) below:

3.2.6.1 Method 1: Annual Issuance – This method is applicable for all certified Production Facilities. The Production Facility has successfully completed performance verification for the Monitoring Period as specified in Chapter 2.3. The Issuing Body issues the amount of CORCs corresponding to the verified CO₂ Removal volume in the Output Audit Report to the CO₂ Removal Supplier's Account associated with the Production Facility.

3.2.6.2 Method 2: Ongoing Issuance – This method is applicable for certified Production Facilities that have demonstrated regular industrial operation and monitoring. Method 2 may be applied to a certified Production Facility that has successfully completed performance verification for the previous Monitoring Period as specified in Chapter 2.3. The procedures for Method 2: Ongoing Issuance are described in Appendix A of this document.

3.2.7. CORCs are issued as integer digits. Any leftover, representing a volume less than 1 metric ton, is

recorded, and added into the Issuance volume of the following Issuance.

Weblink: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

- b) Yes, the programme has procedures in place defining how offset credits (i.e., CORCs) are **retired** under clause 3.3 of the General Rules. The relevant clauses are:

3.3.1 The Retirement removes the CORC from circulation and entitles the Beneficiary exclusive ownership of the quantity and other Attributes of the CO₂ Removal represented in the CORC.

3.3.2. An Account Holder may retire CORCs for their own or another Beneficiary's benefit.

3.3.3. Account Holder, a party authorized by the Account Holder, or a party represented by the Account Holder initiates the Retirement by submitting a Retirement request to the Issuing Body.

3.3.3.1 The Retirement request shall specify the amount of CORCs to be retired along with the following Retirement information:

- i. Beneficiary entity name.
- ii. Use purpose: identification of the purpose of the Retirement.
- iii. Use period: identification of the period of the Retirement.
- iv. Use Country: identification of the country of the Retirement.

3.3.4. The Retirement Request is executed by the Registry Operator and removed from circulation. The Retirement information is made available publicly through the Registry.

3.3.5 The Issuing Body may alter the details of Retirement to rectify errors provided that the alteration does not change the climate impact of the CORC. The alteration request must be submitted in writing within two days from Retirement confirmation.

- c) Yes, even though we do not use the defined term of "**discounting**" in our crediting framework, the programme has procedures in place defining how issued credits (i.e., CORCs) are **withdrawn** from the Registry. We understand this process to be equivalent to discounting and this procedure is under clause 3.4 of the General Rules. The relevant clauses are:

"3.4.1. To maintain the accuracy and veracity of the System, the Issuing Body has the right to withdraw CORCs from an Account Holder's Account.

3.4.1.1 This can take place in case: i. An error has occurred in the issuing, transferring or other processing of the CORC. ii. Due to a material breach of the Puro Standard. iii. To balance the accounts in case of CO₂ Removal reversals according to Chapter 6.7 procedures.

3.4.2. The Issuing Body is entitled to alter the details of CORCs to rectify any errors that have occurred in the Issuance or Transfer process."

- d) Yes, the programme has a procedure in place to define the Length of Crediting Period under clause 2.4.1

of the General Rules: “The first date of the first Monitoring Period marks the beginning of a Crediting Period. The Crediting Period lasts 5 years unless otherwise stated in the applicable Methodology. The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit. The Crediting Period shall not overlap with another Crediting Period.”

- e) Yes, the programme has a procedure in place to define how crediting periods are renewed as stated in clause 2.4.1: “The first date of the first Monitoring Period marks the beginning of a Crediting Period. The Crediting Period lasts 5 years unless otherwise stated in the applicable Methodology. The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit. The Crediting Period shall not overlap with another Crediting Period.”

Weblink to general Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

Question 3.4 Identification and Tracking

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

Yes, the programme utilizes an electronic registry. The Puro Registry is a digital tracking system for managing Account Holders of the Registry and tracking CORCs (units).

In the webpage you can find that “On the Puro Registry you can view CO₂ Removal Certificates, or CORCs, that have been retired and the projects that issued them. CORCs are retired when a beneficiary makes a net zero or carbon neutrality claim that is supported by the CORCs’ carbon sequestration properties.”

The Registry is administered by the programme, as established in the Definitions clause of the General Rules with the following text: “Registry Operator – Body responsible for the technical operation of the Registry. The Registry Operator of the System is Puro.earth Oy.” (weblink to General Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#))

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) Yes, The Puro Registry has the capability and will identify, on all account types, each ICAO-eligible units with a label "CORSIA eligible" as defined in the document Article 6 Procedures (weblink: [Puro.earth Article-6-procedures](https://puro.earth/Article-6-procedures) (hubspotusercontent-na1.net))
- b) The programme has procedures to ensure the Puro Registry identifies, facilitates and tracks units from issuance, through transfer of ownership, to retirement as established in clause 1.1.5 of our General Rules, which establishes: "The Registry stores information of the CORCs issued, transferred, and retired". At the moment issuances and retirements are visible in the Public Registry view of Puro, and current status of ownership/holding of CORCs is only visible to Account Holders. We are willing to change the implementation to include the ownership information if deemed necessary.
- c) Yes, the unit status is visible showing from which project the unit was issued and whether it has been retired or not.
- d) Yes, the programme has procedures to ensure units are uniquely identified with serial numbers according to clause 3.1.1 and 3.5.5.1 of the General Rules. You can see the unique identifier in the third column in the public Puro Registry in the weblink: <https://registry.puro.earth/carbon-sequestration/retirements>.
- e) Yes, the programme has in place procedures where units are identified and designated on the public platform Puro Registry (weblink: <https://registry.puro.earth/carbon-sequestration/retirements>), where each units country or origin and vintages (issuance years) are visible. The identification of units will change from Q2 2024 onwards. The new identity number will hold the country of origin and vintage in the identification number. The new identification is following this format:

Program Code	VVB Identifier	Registry Identifier	Credit Type	Country Code	Modular Benefit Project ID	Vintage	Asset Number
PCS	001	PUR	CORC100+	FI	123456789	2025	57890123467
Digital Asset Id: PCS-001-PUR-CORC100+-FI-123456789-2025-57890123467							

- f) Yes, the Registry Operator has procedures to ensure that the Puro Registry provides a secure, reliable registry platform for carbon removal for registering account holders, unit tracking and transactions. We

understand the critical importance of data security in the carbon market and are committed to upholding the highest standards of data security.

We employ strict access control policies ensuring that only individuals authorized have access to sensitive data and operations within the registry limited to their role. For public access, users do not need user identification or authentication. The public data is freely accessible to all parties. <https://registry.puro.earth/>

The core registry platform is provided as a SaaS service by Nasdaq. For data protection Puro Registry utilizes Azure Database for PostgreSQL Flexible Server, which by default employs Azure Storage encryption to secure data at-rest. This encryption ensures robust security measures are automatically in place for our data storage.

Puro Registry has continuous monitoring and logging of transactions to provide traceability and an audit trail for security assurance and compliance purposes. Puro Registry employs advanced monitoring to quickly identify security incidents, ensuring continuous oversight and high performance.

Puro Registry adheres to international best practices and standards for data protection and cybersecurity, ensuring that our protocols meet or exceed the required benchmarks for security compliance. We conduct data security assessments regularly. The previous security assessment conducted on various Puro.earth services showed that they are maintaining an elevated level of data security.

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))*

Puro.earth does not have the capability to directly transfer units to/from other registries to the Registry it operates, since it is expressly prohibited by clause 3.5.3.5 of the General Rules, which reads: "The Registry does not allow the transfer of CORCs outside of the Registry".

Weblink to General Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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

Puro Registry conforms with and offers an Application Programming Interface (API) for data exchange with other digital systems. The API link is called Puro Connect and it uses the Representational State Transfer (REST) application programming interface (API) standard on existing Hypertext Transfer Protocol (HTTP) methodologies defined by the Request for Comments (RFC) 2616 protocol. Puro Connect API was introduced in October 2023 for commercial users (weblink to blogpost: [Puro Connect API for Sales Channels | Website \(carbon.puro.earth\)](#)). The technical documentation and instruction on how to get started with the API is available at Puro.earth website <https://docs.api.puro.earth/docs/overview/>.

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) Yes, the programme has policies and robust procedures in place to prevent the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services. Puro.Earth has a Conflict-of-Interest Policy approved by its Board of Directors. The document can be accessed via this link: [Puro.earth Conflict of Interest Policy.pdf \(hubspotusercontent-na1.net\)](#).

All staff, including programme registry administrators, are under its scope (clause 1.5).

As established in clause 1.4, conflicts of interest are not prohibited but shall be identified, disclosed, and managed or resolved as appropriate.

Clause 6 establishes the procedure to manage conflicts of interests, which involve:

- i. Training.
- ii. Identification.
- iii. Registration.
- iv. Follow up.

- b) Clause 6.14 establishes the CEO as the ultimate decision maker with a range of resolution measures, such as:
- a. Increased monitoring of the conflict by line manager or Board.
 - b. Disclosure to the affected party such as supplier or buyer in a timely manner. The exclusion of conflicted staff members from the sensitive information.
 - c. Restrictions to participate in discussions or decisions which may be subject to a conflict of interest.
 - d. Exemption of duties and assignment to another staff member.
 - e. Temporary or definite exclusion of the staff member from the relevant committee, steering group, or management meeting.
 - f. Subject to disciplinary actions, up to and including termination of employment of the relevant staff member, in accordance with applicable law.

Finally, clause 7 establishes the obligation for all staff to report the appearance of any conflict of interest.

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

individuals? (Paragraph 2.4.7)	
c) ensuring the periodic audit or evaluation of registry compliance with security provisions? (Paragraph 2.4.8)	<input checked="" type="checkbox"/> YES

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

- a) Yes, the Programme has provisions in place ensuring the screening of requests for registry accounts. The screening of access to registry accounts is done with strict access control. Know Your Customer checks are mandated by our General Rules under clause 1.1.4 that states “All System participants need to be registered Account Holders of the System and need to have signed the Platform Agreement. The Issuing Body shall perform standard know your customer checks for each Account Holder”.
- b) Yes, the Programme has provisions in place “restricting accounts to registered businesses” under clause 1.1.4. of the General Rules. Account Holders in the Puro Registry are businesses, we do not open registry accounts for individual consumers. “1.1.4 All System participants need to be registered Account Holders of the System and need to have signed the Platform Agreement. The Issuing Body shall perform standard know your customer checks for each Account Holder.” Security of access to registry accounts follows these procedures: For Puro.earth staff screening is secured through Single Sign-On (SSO) with Microsoft 365 integration, a traditional username and password method is available. However, not all staff have access to registry accounts. We offer an optional two-factor authentication (2FA) to enhance security to the registry accounts. We employ strict access control policies ensuring that only individuals authorized by registered Account Holders (businesses) have access to sensitive data and operations within the registry, and the access limited only to their own data.
- c) Yes, we have procedures in place for periodic security audits. The previous security assessment conducted on various Puro.earth services showed that they are maintaining an elevated level of data security.

Weblink to General Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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

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

- a) Yes, the programme defines and ensures the underlying attributes of a unit in clause 3.2.4.1 of the General Rules establishes:

“Each CORC shall specify the following Attributes:

- i. Unique identifier.

- ii. Issuance Date.
- iii. CO2 Removal Methodology and its version.
- iv. CORC100+ or CORC1000+ label to communicate the storage durability of the Methodology.
- iv. Production Facility identity, name, and location of the Production Facility.
- v. Host country and sector of the Production Facility.
- vi. Monitoring Period first and last dates of the Output Report.
- vii. Specific information as may be specified in the corresponding Methodology.
- viii. Other Attributes as required.”

- b) Yes, the programme defines and ensures the underlying property aspects of a unit, the General Rules defines a CO2 Removal Certificate (CORC) as a, *“CO2 Removal Certificate is an electronic document, which records the Attributes of CO2 Removal from registered Production Facilities. Each CORC represents a Net Carbon Dioxide Removal volume of 1 ton of Long-Term CO2 Removal.”* Furthermore, the General Rules define under clause 1.1.3 that, *“All processes aim to exclude the possibility of more than one CORC being Issued for the same volume of CO2 Removal and that the CORC Issued represents the sole proof of ownership of the associated CO2 Removal Attributes.”*

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) Yes, the programme has in place requirements and procedures for the validation of activities. These are regulated under clause 2.2 of the General Rules under the name “Design Validation”. Clause 2.2.1 states “2.2.1 Design validation (see Figure 2) involves a Production Facility Audit by an independent 3rd party auditor, followed by a Production Facility Review by the Issuing Body.” ([Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#)) In addition, the Validation and Verification Requirements provide additional definitions and procedures for these two certification stages. (weblink: [Validation & Verification Requirements.pdf \(hubspotusercontent-na1.net\)](#))
- b) Yes, the programme has in place requirements and procedures for the verification of CO2 removals regulated under clause 2.3 of the General Rules under the name “Performance Verification”. Clause 2.3.1 states that “Performance verification involves an Output Audit by an independent 3rd party Auditor,

followed by Output Review by the Issuing Body.” ([Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#)) In addition, the Validation and Verification Requirements provide additional definitions and procedures for these two certification stages. (weblink: [Validation & Verification Requirements.pdf \(hubspotusercontent-na1.net\)](#))

- c) Yes, the programme has in place procedures for the accreditation of both validators and verifiers. Clause 1.4.1. of the General Rules mandates that “The Issuing Body is responsible for accreditation and oversight of Auditors according to the Validation and Verification Requirements. A list of Auditors accredited by the Issuing Body is available on the Puro.earth website.” These requirements which cover the details of the accreditation process can be found in the following weblink: [Validation & Verification Requirements.pdf \(hubspotusercontent-na1.net\)](#)
- d) Answered in c) above.

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:

Yes. The General Rules publicly disclose who is responsible for the administration by establishing that both the Issuing Body and the Registry Operator is the company Puro.earth Oy, based in Finland. Clause 1.1.2 states “The Puro Standard and the Registry are a program for the issuing, transferring, and retiring of CO2 Removal Certificates (CORCs). In the System, Production Facilities capable of removing CO2 are independently audited and certified. CORCs are issued for verified volume of Long-Term Net Carbon Dioxide Removal realized over a time in these Production Facilities. These CORCs are then transferable to other Account Holders. The value of the CORC is realized by Retirement, thereby removing it from circulation and making the Beneficiary of the Retirement the sole owner of the CO2 Removal Attributes.” In addition, the composition of the leadership team published in this weblink: [About us - Puro.earth](#).

Decisions as Issuing Body and Registry Operator are governed by the General Rules, Standard Documents and Methodologies, and the corporate information of the company Puro Earth Oy can be accessed in the Finnish Trade Registry following this link [Puro.earth | Legal Notice](#)

Yes, the programme publicly discloses how decisions are made as through the General Rules and Methodologies are governed by the Advisory Board, as established in clause 1.3.1 of the General Rules: “The rules of the Puro Standard are governed by the Advisory Board. All changes to these rules are subject to the Advisory Board’s approval.”

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) Yes, the Puro.earth programme started operations in 2019 and has been continuously operational and governed since then. Detailed information to Questions A and B can be answered by the Puro timeline provided in this weblink: [About us - Puro.earth](#), scrolling down until reaching “History of Puro.earth”. Evidence of operations can be found in the Finnish Trade Registry provided above.
- b) Answered in a) above.
- c) Yes, answered in d) below.
- d) Yes, Puro’s “Recovery and Orderly Dissolution (ROD) Plan” provides a pre-defined framework which can be applied if Puro.earth encounters material financial distress and needs to ensure that the crediting program continues operations with minimal disruption to the carbon market or key stakeholders. It maintains the solvency of Puro.earth and thereby reduce the risk of not providing its Critical Services (and any non-Critical services assessed and decided to be continued) under a range of scenarios. There are several key objectives for Puro.earth covered in the plan:
 - i. Avoiding interruptions in performance to the customers and stakeholders of Puro.earth.
 - ii. Minimizing the negative impact of distress on the carbon market and stakeholders’ utilization of carbon certificates.
 - iii. Eliminating reliance on an authority or potential future regulator to take discretionary actions.

A confidential copy of the “ROD Plan” is attached.

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) Puro.Earth has a Conflict-of-Interest Policy approved by its Board of Directors. The document can be accessed via this link: [Puro.earth Conflict of Interest Policy.pdf \(hubspotusercontent-na1.net\)](#).

All staff, including programme registry administrators, are under its scope (clause 1.5).

As established in clause 1.4, conflicts of interest are not prohibited but shall be identified, disclosed, and managed or resolved as appropriate.

Clause 6 establishes the procedure to manage conflicts of interests, which involve:

- i. Training.
- ii. Identification.
- iii. Registration.
- iv. Follow up.

b) Clause 6.14 establishes the CEO as the ultimate decision maker with a range of resolution measures, such as:

- a. Increased monitoring of the conflict by line manager or Board.
- b. Disclosure to the affected party such as supplier or buyer in a timely manner. The exclusion of conflicted staff members from the sensitive information.
- c. Restrictions to participate in discussions or decisions which may be subject to a conflict of interest.
- d. Exemption of duties and assignment to another staff member.
- e. Temporary or definite exclusion of the staff member from the relevant committee, steering group, or management meeting.
- f. Subject to disciplinary actions, up to and including termination of employment of the relevant staff member, in accordance with applicable law.

Finally, clause 7 establishes the obligation for all staff to report the appearance of any conflict of interest.

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:

Yes. A confidential attestation is attached with this submission.

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) Yes, clause 5.1 of the General Rules regulates Public Reports, with the following text: "5.1.1 Audit

Statements, Audit Reports, registrations, and project descriptions are publicly available from the Registry. The CO2 Removal Supplier may request to redact confidential or personal information subject to Issuing Body approval.” (weblink [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#))

- b) Yes. Clause 6.4.4 and 6.4.5 of the General Rules state that activities shall conduct stakeholder consultation and have a continuous process in place for There is a specific Standard Document that regulates local stakeholder requirements, covered in detail in Section 2. (weblink [Stakeholder Engagement Requirements.pdf \(hubspotusercontent-na1.net\)](#))
- c) Yes, clause 1.3.4 of the General Rules establishes that any comment made during the public consultation process of methodologies shall be publicly addressed. The clause states “Should the review result in material revisions and/or new Methodologies, they shall be sent to public consultation before approval. Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter. Stakeholder comments are considered, and consultation results are published on the same website.” (weblink [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#))

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):

Yes, to all.

- a) Yes, the programme conducts public comment periods relating to methodologies or frameworks under development. Clause 1.3.4 of the General Rules establish that “Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter.” for any new methodology or for material revisions to existing ones. (weblink [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#))
- b) Yes, the programme conducts public comment periods relating to activities seeking registration or approval. The Standard Document of Stakeholder Engagement Requirements (weblink [Stakeholder Engagement Requirements.pdf \(hubspotusercontent-na1.net\)](#)) establish in clause 2.5 that “The CO2 Removal Supplier shall ensure that all comments received are documented reflecting their true content, without deliberate or undeliberate distortion of its meaning.”
- c) Yes, the programme conducts public comment periods relating to operational activities (e.g., ongoing stakeholder feedback). Clause 5 of the Stakeholder Engagement Requirements establishes an “Ongoing feedback and grievance mechanism”, where Stakeholders shall be given the opportunity to submit continuous feedback on the CO2 Removal Supplier’s activity. Also, clause 6.4.5 of the General Rules

establishes that: “The CO2 Removal Supplier shall have a policy in place to allow stakeholders to submit continuous feedback throughout the operation of the Production Facility.” (Weblink to General Rules [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#))

- d) Yes, the programme conducts public comment periods relating to additions or revisions to programme procedures or rulesets. The Advisory Board governs the rules of the Puro Standard. Clause 1.3.1 fo the General Rules states “The rules of the Puro Standard are governed by the Advisory Board. All changes to these rules are subject to the Advisory Board’s approval.” In addition, clause 1.3.3 General Rules states that “The Advisory Board may request revision to the Puro Standard and Methodologies as necessary. A review is requested when either an Advisory Board Member or Puro.earth management deems that significant changes have occurred in regulations, technologies, carbon accounting, or other provisions.” Furthermore, under clause 1.3.4 “Should the review result in material revisions and/or new Methodologies, they shall be sent to public consultation before approval. Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter. Stakeholder comments are considered, and consultation results are published on the same website.”

Weblink to General Rules [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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) Yes. Section 6.4 of the General Rules is dedicated to Environmental and Social Safeguards. (weblink [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#)).

Under the principle of no net harm (clause 6.4.1), the CO₂ Removal Supplier shall provide documentation that shall robustly address all material environmental and social impacts that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts. (clause 6.4.3).

In addition, environmental and social safeguards are incorporated from the outset in Puro’s methodology development (General Rules, clause 1.3.5.1 Principles that guide methodology development). Environmental and social impacts and risks are key factors in deciding which activities are eligible under a methodology. The CO₂ removal activities and therefore also methodologies vary significantly in terms of their impacts, risks, and regulatory contexts. For instance, the following includes references to the clauses inside each Methodology document:

- i. In **Geological Storage of Carbon (GSC)**, the permanence and safety of the storage are primary considerations necessitating a strict regulatory process for permitting. In such cases, Puro's methodology establishes minimum requirements for the national regulations. However, some carbon removal methodologies are more distributed in nature, potentially having minimal or no permitting requirements. In these instances, Puro deems it necessary to establish more detailed requirements for environmental and social safeguards. (Weblink to the Methodology: [Puro.earth Geologically Stored Carbon Methodology.pdf \(hubspotusercontent-na1.net\)](#)).
- ii. In **Enhanced Rock Weathering (ERW)** Methodology requires a comprehensive environmental risk assessment reviewed by a third party, and a comprehensive analysis of the weathering material (clauses 4.4, 4.5, 5.2 and 5.3). The suppliers must demonstrate and evidence that projects pose a minimal risk of any material negative impacts on the surrounding ecosystems or communities (clauses 5.1.3, 5.1.4). They are prohibited from operating on culturally sensitive land or causing community displacement (clause 5.1.2). In addition to Puro's general stakeholder engagement requirements, the ERW methodology specifically mandates communication about potential health risks (4.5.3). (Weblink to the Methodology: [Enhanced Rock Weathering Methodology \(hubspotusercontent-na1.net\)](#)).
- iii. In **Terrestrial Storage of Biomass (TSB)** Methodology, the requirements also include a third-party reviewed environmental risk assessment or environmental impact assessment with a list of requirements that are particularly relevant for that methodology (clauses 4.8.5-4.8.7). For TSB, there are also detailed requirements related to sustainable sourcing of biomass (clause 4.1.6). Both ERW and TSB include a requirement to demonstrate impacts on local communities (TSB clause 4.9.1, ERW clause 5.1.4). (Weblink to the Methodology: [Terrestrial Storage of Biomass.pdf \(hubspotusercontent-na1.net\)](#))
- iv. For the **Biochar (BCR)** Methodology, the focus has been on sustainable sourcing of biomass (5.2.1), in avoiding emissions of pollutants to air, water and soil (5.3.7), and in ensuring that the biochar is safe for its intended use (1.1.7). Similarly, Geologically Stored Carbon methodology has sustainability requirements for biomass (5.1.3), also highlighting the potential negative impacts to food safety due to land use competition (1.2.6). (Weblink to the Methodology: [Puro.earth Biochar Methodology.pdf \(hubspotusercontent-na1.net\)](#)).
- v. For the **Carbonated Materials (CMA)** Methodology, the focus is described in clause 2.2.4 "The CO2 Removal Supplier shall be able to demonstrate Environmental and Social Safeguards and that the Production Facility activities do no significant harm to the surrounding natural environment or local communities." (Weblink to the Methodology: [Puro.earth Carbonated Materials Methodology.pdf \(hubspotusercontent-na1.net\)](#))

The methodologies also include specific requirements for occupational health and safety, highlighting the most relevant issues for the respective methodology (4.5.4 in ERW, 4.9.3 in TSB, 1.1.8 in biochar).

b) Answered in a) above.

Please check our Methodologies in the following link: [Document library - Methodologies \(puro.earth\)](#)

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:

Yes, and according to clause 6.6.1 of the General Rules “CO₂ Removal Suppliers shall provide qualitative descriptions of expected positive impacts on Sustainable Development Goals (SDG) before the Production Facility Audit.”

The provisions for monitoring, reporting and verification are in clause 6.6.2 of the General Rules, “A CO₂ Removal Supplier shall provide qualitative and quantitative evidence of positive impacts on SDGs for the Output Audit based on SDG Assessment Requirements provided by the Issuing Body.” (weblink [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#))

In addition, the SDG monitoring and reporting is an input for the certification process and it is listed as a required document for the Production Facility Audit under clause 2.2.4.2.ix Positive Sustainable Development Goals (SDG) impacts description.

Finally, the “SDG Assessment Requirements” is a Standard Requirement. This document includes the following parts:

- General principles of assessing positive impacts on SDGs
- Validation and verification of positive impacts on SDGs
- Process for suggesting new project-level indicators for positive impacts on SDGs
- List of currently accepted project-level indicators for positive impacts and associated evidence requirements

And can be accessed via this weblink: [Puro SDG Assess Req.pdf \(hubspotusercontent-na1.net\)](#)

Question 3.11 Avoidance of double counting, issuance and claiming

Does the programme use sustainable development criteria? (<i>Paragraph 2.10</i>)	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>)	YES

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

Yes, the Programme uses sustainable development criteria.

Yes, the Programme provides 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. The Programme recognizes several instances in which double counting could take place and provides procedures to address these cases. Clause 3.5 of the General Rules is dedicated to Preventing Double Counting. All the section is relevant and reads as follows:

“3.5.1 The aim of using the Registry to track CO2 Removal activity and CORCs (CO2 Removal Certificates) is to prevent the possibility of double counting. All processes aim to exclude the possibility of more than one CORC being issued for the same volume of CO2 Removal and that the CORC issued represents the sole proof of ownership of the CORC and associated CORC Attributes.

3.5.1.1 The procedures in place prevent:

- i. Double registration within the Registry.
- ii. Double registration outside of the Registry for CO2 Removal activities.
- iii. Double issuance of CORCs where another program has issued credits for the same project activity during the same period.
- iv. Double retirement and use by two Beneficiaries and being counted towards achieving two mitigation targets. V. Double use within the supply chain.
- v. Double counting in the context of Article 6 of the Paris Agreement.

3.5.2 Preventing double registration within the Registry.

3.5.2.1 The Issuing Body shall control that the same Account Holder shall not register the same CO2 Removal activity twice and that two Account Holders shall not register the same CO2 Removal activity in the same location for the same Crediting Period.

3.5.2.2 The Registry logs proof of ownership of the Production Facility to be certified, and legal rights to the CORCs resulting from the activity of all parties in the supply chain.

3.5.2.3 All Account Holders need to be registered, need to have signed the Platform Agreement and are obliged to follow the procedures as defined in the Platform Agreement.

3.5.3 Preventing double registration outside of the Registry.

3.5.3.1 The Issuing Body shall control that the same Account Holder has not registered the same CO2 Removal activity for the same period with another carbon-crediting program. The same CO2 Removal activity can register with another carbon crediting program for a different Monitoring period.

3.5.3.2 The Registry requires submitting of prior registrations of the same CO2 Removal activity with other crediting programs. The CO2 Removal Supplier registering a CO2 Removal activity shall clearly state if the same activity has been registered with another carbon-crediting program for another Monitoring period. The CO2 Removal Supplier shall also state if it has applied to be registered with another carbon-crediting program but has been rejected and the reason for rejection.

3.5.3.3 In the case of a CO2 Removal activity transferring from another crediting program to the Registry, the Monitoring period shall not overlap. The CO2 Removal Supplier shall provide the document of deregistration from the other carbon-crediting program stating from which date the CO2 Removal activity is no longer credited under the other carbon-crediting program. The CO2 Removal Output produced after the date of registration in the Registry and the corresponding Monitoring period shall be credited under the Puro Standard.

3.5.3.4 When the CO2 Removal activity is deregistered from the Registry, and transfer to another carbon crediting program, the CO2 Removal Supplier shall receive a document of deregistration from the Registry stating from

which date the CO2 Removal activity is no longer certified under the Puro Standard.

3.5.3.5 The Registry does not allow the transfer of CORCs outside of the Registry.

3.5.3.6 The Registry does allow simultaneous registration with other crediting programs that are crediting activities other than CO2 Removals, such as biodiversity credits, or renewable energy credits. In such cases, the Registry requires disclosure of simultaneous registrations, when possible.

3.5.4 Preventing double Issuance.

3.5.4.1 Double issuance of CORCs where another program has issued credits for the same project activity and the same period is prevented by as described above in section 3.5.2.

3.5.5 Preventing double retirement and use.

3.5.5.1 The CORCs are issued in the Registry, where the full lifecycle is tracked from Issuance to Retirement, ensuring avoidance of double Retirement and use. Each CORC is uniquely identified with a serial number, and the Retirements are published with Beneficiary and the Retirement purpose to align with the registry column title in the Registry. A CORC cannot be retired more than once in the Registry.

3.5.6 Preventing double use within the supply chain.

3.5.6.1 The CO2 Removal Supplier is responsible for ensuring that double use or double reporting of the CO2 Removal within the supply chain is prevented by contracts, statements, or other measures. Where a physical product or material stores the removed CO2, the product/material shall not be associated with any claims of CO2 Removal nor other Attributes represented by the CORC, unless the corresponding CORCs have been retired on behalf of this physical material/product.

3.5.7 Preventing double counting in the context of Paris Agreement Article 6.

3.5.7.1 Article 6 of the Paris Agreement enables international cooperation between signatory countries to the Paris Agreement so the world can achieve the goal of net-zero emissions by the second half of this century. CORCs used in the context of Article 6 mechanism shall meet the relevant requirements relating to double counting and corresponding adjustments. The public or private entities that wish to register the CO2 Removal activity as an Article 6 activity shall follow the procedures in the document Article 6 Procedures which defines the procedures for the use of CORCs for Nationally Determined Contributions (NDCs) and other international mitigation purposes under Article 6 of the Paris Agreement.”

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) Yes, the programme’s carbon sequestration or removals exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate. Clause 6.5.1 of the General Rules establishes: “A CO₂ Removal Supplier must demonstrate that the project is not required by existing laws, regulations, or other binding obligations.”
- b) Yes, the programme’s carbon sequestration or removals exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario defined as project baseline. Clause 6.5.2 of the General Rules establishes: “A CO₂ Removal Supplier shall demonstrate CO₂ additionality to the Baseline, meaning that it is resulting in higher volumes of CO₂ removals than the likely Baseline alternatives.”

Weblink [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](https://puro.earth/General-Rules_v.4.0.pdf)

Is additionality and baseline-setting... (Paragraph 3.1)	
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:

Yes, all projects describe project-specific baseline and additionality according to the Additionality Assessment Requirements, page 1: “In Puro Standard a project specific additionality assessment is required. Puro Standard does not work with automatic additionality criteria or placement on a positive list. CO2 Removal Suppliers shall report the CO2 removals claimed against a baseline which represents a conservative scenario for what would likely have happened without carbon finance (the “counterfactual” baseline).”

[Additionality Assessment Requirements \(hubspotusercontent-na1.net\)](https://hubspotusercontent-na1.net)

- (a) Yes, each project’s Baseline and Additionality is assessed and verified by a 3rd party auditor and thereafter reviewed by the programme as stated under clause 2.2.1 “Design validation ... involves a Production Facility Audit by an independent 3rd party auditor, followed by a Production Facility Review by the Issuing Body.”. The procedure takes place during the assessment of the Additionality Assessment Report that is part of the Production Facility Audit documentation required in clause 2.2.4.2.vi.
- (b) Yes, the Programme reviews the additionality and baseline as part of the Additionality Assessment Report setting as part of the Design Validation process under clause 2.2 of the General Rules. As can be seen in Figure 2 in page 6 of the General Rules and in clauses 2.2.4 Production Facility Audit and 2.2.5 Production Facility Review, an accredited independent third-party verification entity conducts a Production Facility Audit, and the programme conducts a Production Facility Review, guaranteeing a two-step verification process.

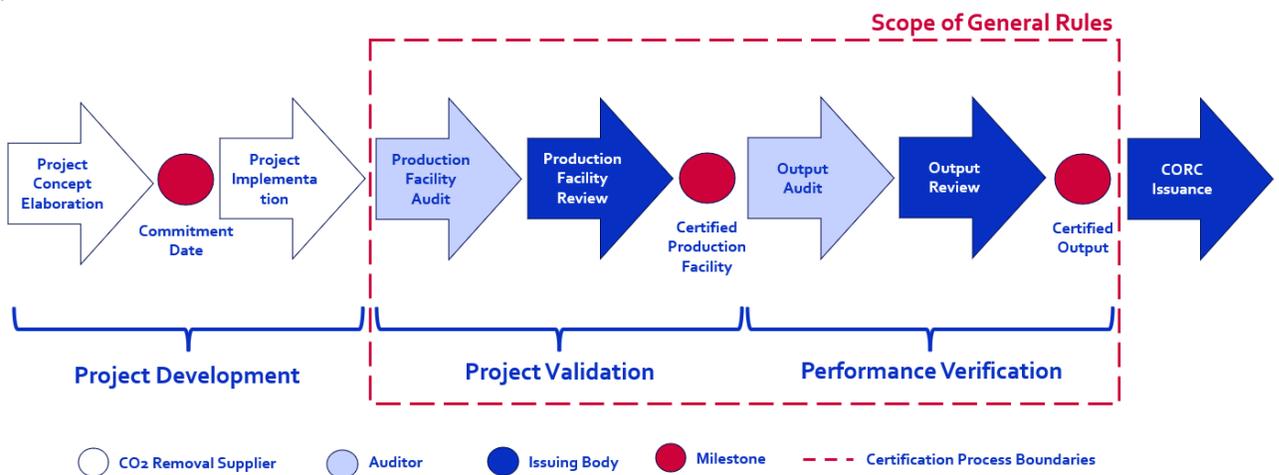


Figure 2: Diagram of the Puro certification process and the scope of the General Rules.

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:

The Additionality Assessment Requirements is a normative Standard Document that must be followed to conduct an additionality assessment. Investment analysis is the additionality test, whereby project proponents shall provide evidence that the project activity is more financially attractive than the alternatives when carbon finance through emission units is included. A copy of the document can be accessed with this link:

[Additionality Assessment Requirements \(hubspotusercontent-na1.net\)](https://hubspotusercontent-na1.net)

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

Puro.earth does not use alternative procedures to the ones listed above.

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:

Puro.earth does not designate any activities as automatically additional.

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*)

All projects describe project-specific baseline and additionality according to the Additionality Assessment Requirements. Each project’s Baseline and Additionality is verified under the reasonable assurance level by a 3rd party auditor and thereafter reviewed by the programme.

Weblink: [Additionality Assessment Requirements \(hubspotusercontent-na1.net\)](https://hubspotusercontent-na1.net)

Question 4.2 Are based on a realistic and credible baseline

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

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

- a) As established in the = Additionality Assessment Requirements (weblink [Additionality Assessment Requirements \(hubspotusercontent-na1.net\)](#), CO₂ Removal Suppliers shall report the CO₂ removals delivered against a baseline which represents a conservative scenario for what would likely have happened without carbon finance (the “counterfactual” baseline). The Puro Standard only credits carbon removals from the atmosphere and not emissions reductions or avoidance, therefore only the removals that are “additional” from the baseline are credited. CO₂ Removal Suppliers can be guided by the CDM Methodological Tool 02 “Combined tool to identify the baseline scenario and demonstrate additionality. Version 5.0” (<https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-02-v7.0.pdf>) to conduct the baseline determination.
- b) As established in clause 2.3.3.4 of the General Rules, the Production Facility documentation is made public in the Registry and this includes, among others: “e. Baseline and Additionality Assessment Report.” (Weblink to General Rules [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#))

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

Yes, the baseline is project specific, and it’s assessed every 5 years for the renewal of the crediting period. The programme requirements ensure not to overestimate the baseline carbon removal to secure storage. As stated in the Additionality Assessment Requirements page 1: “...to report the CO₂ removals delivered against a baseline which represents a conservative scenario for what would likely have happened without carbon finance (the “counterfactual” baseline)”.

Weblink: [Additionality Assessment Requirements \(hubspotusercontent-na1.net\)](#)

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:

Yes, the baseline is project specific, and it's assessed every 5 years for the renewal of the crediting period. All changes to the baseline will be incorporated at that time. CO₂ Removal Suppliers are required to use conservative assumptions and to estimate uncertainty (Clause 6.3 General Rules) and as part of the Production Facility Audit must have a monitoring and reporting plan. Any changes to baseline conditions shall be reported and adjusted.

Production Facility Audit revisit baseline and additionality every 5 years:

"2.4.1 The first date of the first Monitoring Period marks the beginning of a Crediting Period. The Crediting Period lasts 5 years unless otherwise stated in the applicable Methodology. The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit...."

"2.2.4.2 The minimum Production Facility Audit documentation includes the following documentation ...vi. Additionality Assessment Report ..."

Activities are asked to renew their response with any changes to the baseline in the Baseline and Additionality Assessment template and stated as follows: "Define and quantify all reasonable baseline alternatives to the proposed project activity to remove carbon with carbon financing. A baseline is a scenario that reasonably represents the natural and anthropogenic carbon removals to a permanent storage (storage durability over 100 years) in the absence of the carbon removal activity proposed by the CO₂ Removal Supplier ..."

Weblink: [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

Weblink to template: [Puro.earth Baseline and Additionality Assessment.docx \(live.com\)](#)

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) Yes, clause 1.3.5.2 of the General Rules ensure that emission units are based on accurate measurements and valid quantification methods/protocols, mandates that all methodologies shall address the following components:
- i. Applicability or eligibility criteria of the Puro Standard and those specific to the CDR process.
 - ii. Determination of the accounting boundary and quantification of Greenhouse Gas removals and emissions.
 - iii. Determination of the baseline scenario.
 - iv. Determination of additionality.
 - v. Determination of leakage.
 - vi. Expectation of storage duration (i.e., permanence) and risks of reversals.
 - vii. Definition of uncertainty in calculations and assumptions.
 - viii. Mitigation of environmental and social safeguards.
 - ix. Determination of positive Sustainable Development Goals (SDG) impacts.
- b) Yes, as it can be seen from Figure 2, page 6, validation occurs prior to verification generally. Clause 2.3.4 titled “Combining Production Facility Audit and Output Audit” regulates the scenario where validation and verification are performed in tandem.

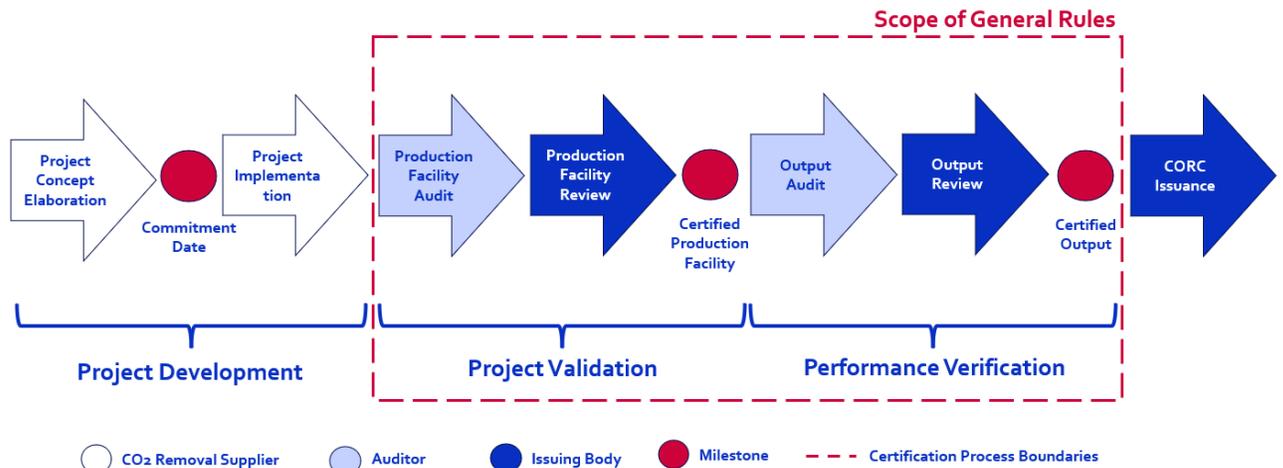


Figure 2: Diagram of the Puro certification process and the scope of the General Rules.

- c) Yes, the results of validation and verification are made publicly available in the Puro Registry as defined in the General Rules clause “5.1.1 Audit Statements, Audit Reports, registrations, and project descriptions are publicly available from the Registry. The CO₂ Removal Supplier may request to redact confidential or personal information subject to Issuing Body approval.”
- d) Yes, the minimum specified interval for monitoring, measuring and report is on an annual basis as established in clause 3.2.5 of the General Rules, which reads: “To initiate the process of CORC Issuance, a CO₂ Removal Supplier with a certified Production Facility sends an Output Report to the Issuing Body

based on an annual basis as described in the Monitoring Plan.” Clause 3.2.6 gives the CO₂ Removal Supplier the option to do annual issuance or ongoing issuance if specific conditions are met.

- e) Yes, the programme has procedures in place to ensure that mitigation is verified by an accredited and independent third-party verification entity as established in clause 2.3.2.2: “An Output Audit is conducted by an independent 3rd party Auditor”
- f) Yes, the programme has in place procedures to ensure that *ex-post* verification of mitigation is required in advance of issuance of emissions units. Only after verification by the third-party auditor and review by the programme (Issuing Body) are CORCs (emission units) issued.

Text:

“Clause 2.3.3 Output Review

2.3.3.1 Output Review is conducted by the Issuing Body. It involves reviewing the Output Audit Report and the documentation submitted by the CO₂ Removal Supplier for the Output Audit.

2.3.3.2 The Output Review of a Production Facility may result in i. A successful Output Review. ii. An unsuccessful Output Review.

2.3.3.3 With an unsuccessful Production Facility Review outcome, the CO₂ Removal Supplier will have a reasonable opportunity to address the identified non-conformity issues within 30 days and submit once new/revised documentation for a re-review.

2.3.3.4 With a successful Output Review outcome i. CO₂ Removal Supplier can move to CORC Issuance.”

Weblink to General Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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) Yes, provisions are in place to manage and/or prevent conflicts of interest, Clause 6 of the Standard Document “Validation and Verification Requirements” (weblink [Validation & Verification Requirements.pdf \(hubspotusercontent-na1.net\)](#)) regulates Conflict of Interest for Validation and

Verification Bodies (VVBs). It establishes that: “For each audit assignment, VVBs shall confirm in writing that they are independent from the entity subject to validation and verification. Functionally, this will take place using the following process: 1.) In the request for proposal (RFP) the VVB declares: “By quoting to this audit project, you – the independent, third-party validation and verification body - declares that you are an impartial auditor, free from any conflicts of interest, capable, and qualified to complete this audit according to Puro Standard and related Validation and Verification Body Requirements.”

- b) Yes, although there is no explicit mention of family members, we would expect that information to be disclosed as part of the declaration of freedom from conflicts of interests. We will evaluate incorporating an explicit mention of family members in the policy.
- c) Yes, revealing a conflict of interest by a VVB with regards to the project means that the VVB is disqualified as it won't be able to sign the no-conflict declaration and therefore can't be appointed as VVB.

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) Yes, the programme has procedures in place requiring that 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. Clause 2.4.1 of the General Rules establishes that for the renewal of the crediting period a new Production Facility Audit shall be performed, hence requiring new baseline and additionality assessments. Relevant text: “2.4.1 The first date of the first Monitoring Period marks the beginning of a Crediting Period. The Crediting Period lasts 5 years unless otherwise stated in the applicable Methodology. The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit. The Crediting Period shall not overlap with another Crediting Period.”
- b) Yes, the programme has procedures in place requiring that 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. Clause 2.4.2 of the General Rules establishes that: “An Output Report shall be submitted to each Production Facility once every 12 months throughout the Crediting Period. An Output Report may consider Production Facility performance for up to 18 months.”

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:

No, Puro.earth does not issue ex ante credits.

CORC Issuance requires verified output report demonstrating that carbon removal has taken place and has been independently verified by a 3rd party auditor as stated in the General Rules clause “3.2.2 CORCs are always issued based on an Output Audit Report for a specified Monitoring Period for a certified Production Facility quantifying the Net CO2 Removal. The CO2 removal and the greenhouse gas emissions are quantified using the rules defined in the corresponding Methodology.”

Weblink to General Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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:

The programme focuses on carbon sequestration activities. All five (5) Methodologies have a potential risk of reversal, and a CO₂ Removal Supplier shall assess the risk and have mitigation measures to manage it, monitor and report it. (Clause 6.7, Permanence and Risk of Reversal [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#))

What is the minimum scale of reversal for which the Programme provisions or measures require a response? (Quantify if possible)

There is no minimum scale of reversal. All issued emission units include a Reversal risk estimation (clause 6.7.3 General Rules). Relevant text: “6.7.3.2 The risk estimation shall include an estimation of risk impact and risk likelihood of every material risk. The methods utilized for estimation must be scientifically justifiable and detailed in the Reversal risk estimation. The estimation must include a description of the methods and values used to estimate impacts and likelihoods, such as statistical methods, peer-reviewed scientific literature or local regulations and guidelines”.

Weblink to General Rules: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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) Yes, the programme requires that CO₂ Removal Suppliers undertake a risk assessment that accounts for, *inter alia*, any potential causes, relative scale, and relative likelihood of reversals, covered in clause 6.7.3 of the General Rules. Relevant text: "6.7.3 Methodologies in the Puro Standard shall include a Reversal risk estimation of an issued CORC."
- b) Yes, the programme requires that CO₂ Removal Suppliers monitor the identified risk of reversals, covered in clause 6.7.5.1 of the General Rules. Relevant text: "6.7.5.1 If the CO₂ Removal detects a Reversal event, the CO₂ Removal Supplier shall without delay act to: i. Prevent further reversal from occurring. ii. Notify the Issuing Body of any the Reversal event. iii. Determine the failure that caused the Reversal event. iv. Calculate the Reversal quantify (in tCO₂e)."
- c) Yes, the programme requires that CO₂ Removal Suppliers mitigation of risks of reversals, covered in clause 6.7.4 and 6.7.5. Relevant text: "6.7.4 Where material risks are identified, the Methodologies in the Puro Standard shall include obligations on CO₂ Removal Suppliers for risk identification, preemptive risk mitigation, management, and reporting practices. The CO₂ Removal Supplier shall by undertaking the obligations ensure that the issued CORCs remain firmly and durably stored for the long term. 6.7.5 If due to the failure of the CO₂ Removal Supplier to perform these obligations there is a Reversal event, CO₂ Removal Supplier is liable for it and is obliged to provide compensation."
- d) Yes, the prorgamme ensures that there is full compensation for material reversals of mitigation in all cases, clause 6.7.5 of the General Rules establishes that: "If due to the failure of the CO₂ Removal Supplier (...) there is a Reversal event, CO₂ Removal Supplier is liable for it and is obliged to provide compensation.". Compensation is further defined in clause 6.7.6.3, which establishes that: "The CO₂ Removal Supplier shall deposit CORCs of the same type or, if unavailable, of comparable permanence to the Account of the CO₂ Removal Supplier equal to Reversal quantity for the Issuing Body to withdraw."

Weblink: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](https://puro.earth/General-Rules_v.4.0.pdf)

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

a manner mandated in the programme procedures?	
b) require activity proponents, upon being made aware of a material reversal event, to notify the programme within a specified number of days?	<input checked="" type="checkbox"/> YES
c) confer responsibility to the programme to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in the programme procedures?	<input checked="" type="checkbox"/> YES

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

- a) Yes, the programme has measures to confer liability to monitor, mitigate and respond to reversals to the CO₂ Removal Supplier, as covered in clause 6.7.5 of the General Rules. Relevant text: "6.7.5 If due to the failure of the CO₂ Removal Supplier to perform these obligations there is a Reversal event, CO₂ Removal Supplier is liable for it and is obliged to provide compensation."
- b) Yes, the programme requires CO₂ Removal Suppliers to notify the programme in the event of a material reversal event, covered in clause 6.7.5.1 ("without delay") of the General Rules. Relevant text: " 6.7.5.1 If the CO₂ Removal detects a Reversal event, the CO₂ Removal Supplier shall without delay act to: i. Prevent further reversal from occurring. ii. Notify the Issuing Body of any the Reversal event. iii. Determine the failure that caused the Reversal event. iv. Calculate the Reversal quantify (in tCO₂e)."
- c) Yes, the programme requires such reversals are fully compensated, and covered in the following clauses with relevant text:
 - i. "6.7.6 The Issuing Body reviews the notification, failure, and Reversal quantity. The Issuing Body may seek clarifications from an Output Auditor to form the final opinion.
 - ii. 6.7.6.1 The issuing Body subtracts Reversal quantity from the Output volume for the Monitoring Period where the Reversals occurred, or the subsequent Monitoring Period.
 - iii. 6.7.6.2 The issuing Body withdraws and invalidates CORCs from the Account of the CO₂ Removal Supplier equal to Reversal quantity.
 - iv. 6.7.6.3 The CO₂ Removal Supplier shall deposit CORCs of the same type or, if unavailable, of comparable permanence to the Account of the CO₂ Removal Supplier equal to Reversal quantity for the Issuing Body to withdraw."

Weblink: [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](https://puro.earth/General-Rules_v.4.0.pdf)

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? (<i>Paragraph 3.5.6</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

Yes, the programme has the capability but not the rules nor procedures yet. We are ready and willing to mandate this procedure as part of our framework and commit to implementing it this year by the end of Q2. It would entail mandating that the label of "Corsia-eligible" attached to the credit is considered part of its climate impact, therefore, only a credit with the same labeling would satisfy the compensation requirement.

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>)	<input checked="" type="checkbox"/> YES
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Question 4.6 Assess and mitigate against potential increase in emissions elsewhere

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

All Puro Methodologies present a risk of potential emissions leakage and contain specific provisions and obligations on how to calculate them, mitigate them and deduct what is not avoidable from the total credit issuance calculation. This requirement is under clause 6.2.8 “Methodologies in the Puro Standard shall consider net Leakage effects which may occur in the situation where, for a single Leakage effect (e.g. energy-related activity shifting), the Leakage effect is associated with both an increase and decrease in emissions. In that case, the net effect shall be considered and result in either positive or negative Leakage. Only net negative Leakage effects shall be included in the quantification of CORCs, i.e. leading to a reduction in the amount of CORCs that can be claimed. Net positive Leakage effects are dismissed from the quantification of CORCs but may be presented as co-benefits.”

Weblink: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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:

Yes, the programme has provisions in place at the Methodology level to identify, mitigate, and account for unmitigated leakage. These provisions are covered in detail in section 6.2 of the General Rules which in summary establishes an obligation to the CO₂ Removal Supplier to evaluate leakage (clause 6.2.2. that states “Leakage is the concept of an increase or decrease in greenhouse gas emissions or removals, outside of the system boundaries of the activity”), including all its potential sources and developing a plan to avoid, minimize and mitigate leakage. What cannot be avoided or mitigated, must be deducted from the credit issuance calculation as stated in clause 6.2.8. “Methodologies in the Puro Standard shall consider net Leakage effects which may occur in the situation where, for a single Leakage effect (e.g. energy-related activity shifting), the Leakage effect is associated with both an increase and decrease in emissions. In that case, the net effect shall be considered and result in either positive or negative Leakage. Only net negative Leakage effects shall be included in the quantification of CORCs, i.e. leading to a reduction in the amount of CORCs that can be claimed. Net positive Leakage effects are dismissed from the quantification of CORCs but may be presented as co-benefits.”

Weblink: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

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:

Yes, the programme requires provisions to identify and mitigate leakage based on the context of implementation of the Methodologies. These potential scenarios are covered in clauses 6.2.1 and 6.2.4 of the General Rules. The text:

6.2.1. “The CO₂ Removal Supplier must evaluate leakage following the requirements defined in the applicable Methodology.”

and,

6.2.4. “Methodologies in the Puro Standard shall then have requirements designed to avoid, minimize, or mitigate the effects of Leakage.”

Weblink: [Puro.earth/General-Rules_v.4.0.pdf](https://puro.earth/General-Rules_v.4.0.pdf) ([hubspotusercontent-na1.net](https://puro.earth/hubspotusercontent-na1.net))

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:

Yes, clause 6.2.8 of the General Rules establishes an obligation to include the leakage calculation into the verification framework, and the leakage that is observed must be deducted from the total credit issuance. The relevant text is as follows: “Methodologies in the Puro Standard shall consider net Leakage effects which may occur in the situation where, for a single Leakage effect (e.g. energy-related activity shifting), the Leakage effect is associated with both an increase and decrease in emissions. In that case, the net effect shall be considered and result in either positive or negative Leakage. Only net negative Leakage effects shall be included in the quantification of CORCs, i.e. leading to a reduction in the amount of CORCs that can be claimed.”

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:

Yes, in General Rules clause 6.2.8 establishes that “net negative leakage effects shall be included in the quantification of CORCs, i.e. leading to a reduction in the amount of CORCs that can be claimed.”

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) Yes, the programme has procedures to ensure that only 1 unit is issued for one tonne of mitigation in clause 3.2.4 of the General Rules, and we explicitly prohibit the transfer of CORCs to other registries as stated in clause 3.5.3.5 of the General Rules.: “The Registry does not allow the transfer of CORCs outside of the Registry.”
- b) Yes, the programme ensures that one unit is issued, owned, or cancelled by only one entity at any given entity in clause 3.5.1, in General Rules: “The aim of using the Registry to track CO2 Removal activity and CORCs (CO2 Removal Certificates) is to prevent the possibility of double counting. All processes aim to exclude the possibility of more than one CORC being issued for the same volume of CO2 Removal and that the CORC issued represents the sole proof of ownership of the CORC and associated CORC Attributes.”.
- c) Yes, the programme discourages and prohibits the double-selling of units through clause 3.5.5.1 of the General Rules “The CORCs are issued in the Registry, where the full lifecycle is tracked from Issuance to Retirement, ensuring avoidance of double Retirement and use. Each CORC is uniquely identified with a serial number, and the Retirements are published with Beneficiary and the Retirement purpose to align with the registry column title in the Registry. A CORC cannot be retired more than once in the Registry.”
- d) Yes, the programme ensures that host countries agree to account of any CORCs issued such as double claiming between the airline and host country does not occur. In the Standard Document “Article 6 Procedures” describes the process of applying corresponding adjustments by the host country in section 3.3, and more specifically under clause 3.3.3. “The use of CORCs for international mitigation (CORSIA) or other purposes requires that the host country exclude the CORCs from their emissions balance and avoid double counting them in their NDC report.” In addition, the Issuing Body has a procedure to ensure evidence of application of corresponding adjustment in section 3.4, starting in clause 3.4.1 “The Issuing Body shall require evidence that the host country has applied relevant corresponding adjustments in accordance with the LoA and other relevant requirements under Article 6 of the Paris Agreement.”

(Weblink [Puro.earth_Article-6-procedures_\(hubspotusercontent-na1.net\)](http://Puro.earth_Article-6-procedures_(hubspotusercontent-na1.net)))

Does the Programme have procedures in place for the following: (<i>Paragraph 3.7.8</i>)	
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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) Yes, the programme has a procedure in place to require activity proponents (i.e., CO2 removal suppliers) to obtain and share with the Issuing body written attestation from the host country's national focal point or designated authority. This procedure is described in section 3.2. "Process of Authorization" of our "Puro Standard Article 6 Procedures", specifically under clause 3.2.7:

"3.2.7 Description of the Authorization Process.

- a. The Figure A.1, Page 7, describes the process by which the CO2 Removal Supplier requests a LoA from the designated authority of the host Country, CORCs retirements with accounting adjustments, and responsibilities of all parties involved in the process.
- b. The CO2 Removal Supplier shall define the volume of CORCs and their vintage for which it wants to apply for a LoA.
- c. Once the Puro Standard achieves CORSIA eligibility, all CORCs could be authorized to participate in this international mitigation program. CORCs will include the attribute tag CORSIA-eligible in the Puro Registry.
- d. The CO2 Removal Supplier requests the LoA from the host Country. Later, it shares the LoA with the Issuing Body.
- e. The Issuing Body publishes in the Registry the LoA and identifies the volume of CORCs and their vintage available for trade under those conditions.
- f. Once the first transfer conditions are met through the trade of CORCs, the host Country (and the using Country, when applicable) shall apply the corresponding adjustments to their national emissions balance. First transfer conditions are described in Table A.1."

(weblink [Puro.earth Article-6-procedures \(hubspotusercontent-na1.net\)](https://puro.earth/Article-6-procedures)).

- b) Yes, the programme has procedures to prevent double counting of mitigation outcomes (i.e., CORCs) by operators under CORSIA and at the same time being claimed toward a host country's national mitigation target(s) / pledge(s). Clause 3.3.3 of our "Puro Standard Article 6 Procedures" explicitly cover this with the following normative text: "The use of CORCs for international mitigation (CORSIA) or other purposes requires that the host country exclude the CORCs from their emissions balance and avoid double counting them in their NDC report." In addition, clause 3.2.10 states that "The LoA shall serve as a written

declaration by the host country to commit to apply the corresponding adjustments of the authorized CORCs when applicable.” Moreover, section 3.4, specifically clause 3.4.1 “The Issuing Body shall require evidence that the host country has applied relevant corresponding adjustments in accordance with the LoA and other relevant requirements under Article 6 of the Paris Agreement.”

- c) Yes, we have a procedure that requires activity proponents (i.e., CO2 removal suppliers) to obtain an attestation (i.e., Letter of Authorization (LoA)) from the host country authorizing the use of their CORCs in CORSIA. Once the Issuing Body has received a copy of the attestation, it is made public. This procedure is under section 3.2 Process of Authorization clause 3.2.5. which establishes: “The designated authority of the host Country must provide a Letter of Authorization (LoA) for a CO2 Removal Supplier that wishes to supply CORCs to trade as ITMOs or other international mitigation purposes that are part of a compliance market.” The process of authorization is described in clause 3.2.8 with the publication of the attestation under 3.2.8.e “The Issuing Body publishes in the Registry the LoA and identifies the volume of CORCs and their vintage available for trade under those conditions.”

Does the Programme have procedures in place requiring... (<i>Paragraph 3.7.9</i>)	
a) that activities take approach(es) described in (any or all of) these sub-paragraphs to prevent double-claiming?	<input checked="" type="checkbox"/> YES
<input checked="" type="checkbox"/> Emissions units are created where mitigation is not also counted toward national target(s) / pledge(s) / mitigation contributions / mitigation commitments. (<i>Paragraph 3.7.9.1</i>)	
<input checked="" type="checkbox"/> Mitigation from emissions units used by operators under the CORSIA is appropriately accounted for by the host country when claiming achievement of its target(s) / pledges(s) / mitigation contributions / mitigation commitments, in line with the relevant and applicable international provisions. (<i>Paragraph 3.7.9.2</i>)	
<input checked="" type="checkbox"/> Programme procedures provide for the use of method(s) to avoid double-claiming which are not listed above (<i>Paragraph 3.7.9.3</i>)	
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) Yes, the programme has procedures in place to avoid double counting of mitigation outcomes (i.e., CORCs) according to the sub-paragraphs described above and answered as follows:
- i. To avoid the “Puro Standard Article 6 Procedures” defines and labels the authorized uses under Article 6 of the Paris agreement in section 3.1. and describes the process of applying Corresponding Adjustments based on first transfer conditions under section 3.3 and the commitment from host country based on the attestation provided through the Letter of Authorization (LoA) in section 3.2. Finally, clause 3.3.4 of the “Puro Standard Article 6 Procedures” states “The Issuing Body shall ensure that CORCs are retired for a single type of authorized use to avoid double claiming, and the corresponding adjustment are properly recorded and made publicly available through the Registry.”

(weblink [Puro.earth Article-6-procedures \(hubspotusercontent-na1.net\)](#)).

- ii. The programme has procedures to ensure that the mitigation from emissions units used by operators under the CORSIA is appropriately accounted for by the host country by first requiring the activity proponent (i.e., CO2 removal supplier) to obtain and publish a LoA for the CORCs which defines the authorized uses of the CORCs and their corresponding adjustment as stated under clause 3.1.1 of the “Puro Standard Article 6 Procedures” states that “Under Article 6 of the Paris Agreement, a host Country can choose to authorize the use of mitigation outcomes generated within its jurisdiction for international cooperation approaches. The purpose of this authorization is to allow cooperation between participating countries to achieve efficient mitigation outcomes in their Nationally Determined Contributions (NDCs) or allow the use for other international mitigation purposes. This requires performing the corresponding adjustments in the accounting of the mitigation outcomes in the national emissions balance of the host and using countries. Thus, preventing double counting.” Moreover, clause 3.3.3 states that “The use of CORCs for international mitigation (CORSIA) or other purposes requires that the host country exclude the CORCs from their emissions balance and avoid double counting them in the structured summary of its biennial transparency reports, as referred to in Paragraph 77, sub-paragraph (d), of Annex to decision 18/CMA.1 and consistent with relevant future decisions.” Finally, the programme requires evidence of the application of corresponding adjustments under section 3.4 and more specifically under clause 3.4.1 “The Issuing Body shall require evidence that the host country has applied relevant corresponding adjustments in accordance with the LoA and other relevant requirements under Article 6 of the Paris Agreement.” (weblink [Puro.earth Article-6-procedures \(hubspotusercontent-na1.net\)](#)).
 - iii. The programme has procedures to avoid double counting as described in General Rules in section 3.5 “Preventing Double Counting”, specifically under clause 3.5.7.1 “Article 6 of the Paris Agreement enables international cooperation between signatory countries to the Paris Agreement so the world can achieve the goal of net-zero emissions by the second half of this century. CORCs used in the context of Article 6 mechanism shall meet the relevant requirements relating to double counting and corresponding adjustments. The public or private entities that wish to register the CO2 Removal activity as an Article 6 activity shall follow the procedures in the document *Article 6 Procedures* which defines the procedures for the use of CORCs for Nationally Determined Contributions (NDCs) and other international mitigation purposes under Article 6 of the Paris Agreement.” (weblink: [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#)).
- b) Yes, the process of authorization of uses of CORCs under Article 6 of the Paris Agreement is described in section 3.2 of the Puro Standard Article 6 Procedures. The Letter of Authorization issued by the designated authority of the host country defines which uses are authorized and could merit the use of their corresponding label provided they meet any additional requirements such as CORCs meet the CORSIA Emissions Eligibility Unit Criteria, and the Puro Standard is approved to provide CORSIA Eligible Emissions Units for the Compliance Period. The authorization process is described in detail in clause 3.2.7 and states “Description of the Authorization Process.
- a. The Figure A.1, Page 7, describes the process by which the CO2 Removal Supplier requests a LoA

from the designated authority of the host Country, CORCs retirements with accounting adjustments, and responsibilities of all parties involved in the process.

- b. The CO2 Removal Supplier shall define the volume of CORCs and their vintage for which it wants to apply for a LoA.
- c. Once the Puro Standard achieves CORSIA eligibility, all CORCs could be authorized to participate in this international mitigation program. CORCs will include the attribute tag CORSIA-eligible in the Puro Registry.
- d. The CO2 Removal Supplier requests the LoA from the host Country. Later, it shares the LoA with the Issuing Body.
- e. The Issuing Body publishes in the Registry the LoA and identifies the volume of CORCs and their vintage available for trade under those conditions.
- f. Once the first transfer conditions are met through the trade of CORCs, the host Country (and the using Country, when applicable) shall apply the corresponding adjustments to their national emissions balance. First transfer conditions are described in Table A.1.”

(weblink [Puro.earth_Article-6-procedures \(hubspotusercontent-na1.net\)](http://Puro.earth_Article-6-procedures (hubspotusercontent-na1.net))).

Does the Programme... (<i>Paragraph 3.7.10</i>)	
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) Yes, the programme will make publicly available any national government decisions related to accounting for units used in ICAO, including the contents of host country attestations. In the “Puro Standard Article 6 Procedures”, under 3.2.8 Description of the Authorization Process, clause “3.2.8.e. The Issuing Body publishes in the Registry the LoA and identifies the volume of CORCs and their vintage available for trade under those conditions.” Moreover, in clause 3.4.2 “The Issuing Body shall make publicly available in the Registry the evidence of application of the corresponding adjustment when available.” (weblink [Puro.earth_Article-6-procedures \(hubspotusercontent-na1.net\)](http://Puro.earth_Article-6-procedures (hubspotusercontent-na1.net))).
- b) Yes, the programme will update information pertaining to host country attestation as often as necessary to avoid double-claiming in the “Puro Standard Article 6 Procedures”, in addition to the “3.2. Process of Authorization” to obtain and publish the LoA, clause 3.2.6 states “The CO2 Removal Supplier will make the LoA available to the Issuing Body as evidence of authorization and provide any updates issued by the host country to the information contained in the LoA.” Moreover, the Issuing Body will keep track on the process under “3.4 Evidence of application of corresponding adjustments” to avoid double counting. Clause 3.4.1 states: “The Issuing Body shall require evidence that the host country has applied relevant corresponding adjustments in accordance with the LoA and other relevant requirements under Article 6

of the Paris Agreement.”

(weblink [Puro.earth_Article-6-procedures \(hubspotusercontent-na1.net\)](http://Puro.earth_Article-6-procedures (hubspotusercontent-na1.net))).

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? (<i>Paragraph 3.7.11</i>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

Yes, the programme has 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. In the “Puro Standard Article 6 Procedures”, clause 3.4 “Evidence of application of corresponding adjustments” describes the procedure by which the Issuing Body requires evidence that the host country has applied the relevant corresponding adjustment to CORCs authorized under Article 6 of the Paris Agreement. In addition, section 3.6 of the procedures describes how the Issuing Body will carry out “Reporting on authorized uses” to facilitate the comparison. (weblink [Puro.earth_Article-6-procedures \(hubspotusercontent-na1.net\)](http://Puro.earth_Article-6-procedures (hubspotusercontent-na1.net))).

The text is:

- 3.4.1. The Issuing Body shall require evidence that the host country has applied relevant corresponding adjustments in accordance with the LoA and other relevant requirements under Article 6 of the Paris Agreement.
- 3.4.2. The Issuing Body shall make publicly available in the Registry the evidence of application of the corresponding adjustment when available.
 - a. This could be made possible by a link to the source of information or a copy of the relevant documentation.
 - b. In case the evidence of the corresponding adjustment is not available, the Issuing Body shall indicate in its Registry that the CORCs are Authorized for Article 6 but do not have evidence of its corresponding adjustment.
- 3.4.3. Until alternative means are established and identified, the CO2 Removal Supplier shall be responsible for submitting evidence of Article 6 Reporting and Compliance to the Issuing Body with respect to CORCs issued to their project(s), using information made publicly available by the host country. This evidence shall include:
 - a. A copy of the host country’s Initial Report demonstrating the country’s fulfilment of its responsibilities with Article 6.2 requirements.
 - b. A copy of the host country’s Biennial Transparency Report following the “first transfer” of CORCs, in which the relevant corresponding adjustment has been applied and reported.
 - c. Other means by which the host country provides evidence of the application of the corresponding adjustments to uniquely identified CORCs.

and, from clause 3.6:

- 3.6.1. The Issuing Body shall communicate transparently, through the Registry and other public reports, the retirement of authorized CORCs used towards:
- a. Meeting the NDC commitment of other countries than the host country of the CO2 removal activity.
 - b. Complying with the obligations set under CORSIA by airline operators.
- 3.6.2. To facilitate the comparison CORCs use against national reporting under the Paris Agreement, the Issuing Body shall publish on its website a report on the CORCs with authorized uses to enable host countries to fulfill their Reporting, Recording and Tracking obligations. This report includes information available in the Registry and shall:
- a. Be published on an annual basis and prior to the 15th of April of each calendar year.
 - b. Provide project information subject to the confidentiality clauses presented in the Decisions of the CMA¹⁰. This information may include the authorizing host country, project name and ID, activity type, sector, and authorized uses of the CORCs.
 - c. Specify the vintage year or issuance year of the reported CORCs.
 - d. Specify the unique identifier or certificate number of the reported CORCs.
 - e. Provide record of the transfer of authorized CORCs, including first transfer.
 - f. Provide record of the retirement of authorized CORCs including beneficiary, using country (country of consumption), retirement purpose in accordance with the authorized use by the host country, and quantity of retired CORCs.
 - g. Provide any additional information which may include changes to or revocation of a LoA.

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

Yes, in the "Puro Standard Article 6 Procedures", clause 3.5 "Non-application of corresponding adjustment by host countries", describes the procedures the Issuing Body carries out to reconcile CORCs used under CORSIA, when there is no evidence or clear expectation that the host country will ensure corresponding adjustments. (weblink [Puro.earth Article-6-procedures \(hubspotusercontent-na1.net\)](#)). The text is:

- 3.5.1 The Issuing Body shall apply procedures to reconcile the information of its Registry for CORCs with authorized uses within the Article 6 of the Paris Agreement framework in the following cases:
- a. No evidence of application of corresponding adjustments has been received one year after the host country was required to apply and report the corresponding adjustment of the affected

¹⁰ Conference of the Parties serving as the meeting of the Parties to the Paris Agreement.

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>)	<input checked="" type="checkbox"/> YES
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Yes, the programme is willing and able to report to ICAO's relevant bodies the performance information as requested.

Question 4.8 Do no net harm

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>)	<input checked="" type="checkbox"/> YES
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Summarize and provide evidence of the policies and procedures referred to above:

Yes, the Programme has procedures to ensure that offset projects do not violate local, state/provincial, national or international regulations or obligations. Under the principle of no net harm (clause 6.4.1) of the General Rules, the CO2 Removal Supplier shall provide documentation that shall robustly address all material environmental and social impacts that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts. (clause 6.4.3). The texts are:

6.4.1. "A CO2 Removal Supplier shall be able to demonstrate Environmental and Social Safeguards and that the Production Facility activities¹¹ do no net harm to the surrounding natural environment or local communities."

And,

6.4.3. "The CO2 Removal Supplier shall provide documentation, that shall robustly address all material¹² environmental and social impacts, including aspects listed in 7.4.1.1, that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts."

Weblink: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](https://puro.earth/General-Rules_v.4.0.pdf)

¹¹ It shall be noted that the responsibility of the Production Facility operator extends to the imminent environmental and human health related impacts of the use of manufactured products as far as concerned in the Environmental Impact Assessment or environmental permit.

¹² In assessment of materiality of negative impacts, CO₂ Removal Suppliers can be guided for example by Global Reporting Initiative (GRI) Universal Standards 3: Material topics, or by European Sustainability Reporting Standards (ESRS) Implementation Guidance (IG 1) on Materiality assessment, currently available as a draft.

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

Yes, the programme obliges CO₂ Removal Suppliers to respond to a questionnaire addressing compliance in detail with social and environmental safeguards. You can find this questionnaire with the following weblink: [Puro Env & Soc Assess.pdf \(hubspotusercontent-na1.net\)](#)

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*)

Clause 6.4 of the General Rules contains the programme's public requirements that are used to implement, monitor, and enforce social and environmental safeguards. The evidence can be found in the following sub-clauses:

6.4.1.1 Adhere to the following aspects as described by the Integrity Council for the Voluntary Carbon Market (IC-VCM): i. Abide by national and local laws, objectives, programs, and regulations and, where relevant, international conventions and agreements. ii. Respect for human rights and avoiding discrimination; abiding by the International Bill of Human Rights and universal instruments ratified by the host country. iii. Recognize, respect, and promote the protection of the rights of IPs & LCs (indigenous peoples and local communities) in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and International Labor Organization (ILO) Convention 169 on Indigenous and Tribal Peoples. iv. Labor rights and working conditions, including prohibiting forced labor, child labor or trafficked persons whether in own operations or employed by third parties, fair treatment of employees, and safe and healthy working conditions. v. Providing for equal opportunities in the context of gender; providing equal pay for equal work and protecting against and appropriately responding to violence against women and girls. vi. Pollution prevention, including pollutant emissions to air, water, and soil as well as noise and vibration, and generation of waste and release of hazardous materials, chemical pesticides, and fertilizers. vii. Avoiding or minimizing adverse impacts to community health and safety. viii. Biodiversity conservation and sustainable management of natural resources, including avoiding or minimizing negative impacts on terrestrial and marine biodiversity and ecosystems; protecting the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity; minimizing soil degradation and soil erosion and minimizing water consumption and stress. The CO₂ Removal Supplier shall not convert natural forests or high conservation value habitats. ix. Preserves and protects cultural heritage and cultural and religious sites. x. Avoiding forced physical and or economic displacement. If avoidance is not feasible, CO₂ Removal Suppliers shall minimize physical and/or economic displacement. This applies also to any access restrictions to lands, territories, or resources, and any customary rights of local right holders.

6.4.2 When the activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO₂ Removal supplier shall develop the Production Facility with free, prior, informed consent (FPIC).

6.4.3 The CO₂ Removal Supplier shall provide documentation, that shall robustly address all material environmental and social impacts, including aspects listed in 6.4.1.1, that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.

PART 5: Programme comments

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

Puro.earth is a pioneering company that has proven that negative emissions can be monetized, and new industries can be spawned when a new business model is introduced. When we started operations in 2019, there were hardly any professionally run biochar production facilities in the world. At the moment there are hundreds of companies all around the world that are ambitiously scaling their biochar operations to mitigate climate change. We systematically observe new innovations in the durable carbon removal space and when there is sufficient scientific evidence and technology readiness level, we set up a working group to establish a new methodology, the rules which projects must follow. Much of that work will result in revenue much later and we invest now for the future. We intend to continue to pioneer new carbon drawdown pathways.

This year will be transformative for Puro.earth and the whole durable carbon removal industry. Thus far, only Biochar and Carbonated Materials CORCs have been issued and retired by buyers. Some of the pioneering buyers include Swiss Re, Stripe, Shopify, Microsoft, JP Morgan, BCG, Zurich and over 300 more. Also, the Geologic Carbon Removal methodology published in 2021 will have the first issuances with Direct Air Capture and Storage (DACs) and Bioenergy with Carbon Capture and Storage (BioCCS) projects during 2024. Furthermore, first issuances with Enhanced Rock Weathering and Terrestrial Storage of Biomass are likely to take place this year with massive scaling potential for this decade.

The world needs CO₂ removal as stated in the Paris Agreement and by the Intergovernmental Panel on Climate Change and Governments worldwide, but it does not come without the business case for investment. And durable CO₂ removal needs incentives to scale this decade. CORSIA is in a unique position to incentivize demand, and supply can be incentivized by Puro.earth - the leading global durable carbon dioxide removal platform.

SECTION IV: SIGNATURE

I certify that I am the administrator or authorized representative (“Programme Representative”) of the emissions unit programme (“Programme”) represented in a) this form, b) evidence accompanying this form, and c) any subsequent oral and/or written correspondence (a-c: “Programme Submission”) between the Programme and ICAO; and that I am duly authorized to represent the Programme in all matters related to ICAO’s analysis of this application form; and that ICAO will be promptly informed of any changes to the contact person(s) or contact information listed in this form.

As the Programme Representative, I certify that all information in this form is true, accurate, and complete to the best of my knowledge.

As the Programme Representative, I acknowledge that:

the Programme’s participation in the assessment does not guarantee, equate to, or prejudice future decisions by Council regarding CORSIA-eligible emissions units; and

the ICAO is not responsible for and shall not be liable for any losses, damages, liabilities, or expenses that the Programme may incur arising from or associated with its voluntary participation in the assessment; and

as a condition of participating in the assessment, the Programme will not at any point publicly disseminate, communicate, or otherwise disclose the nature, content, or status of communications between the Programme and ICAO, and of the assessment process generally, unless the Programme has received prior notice from the ICAO Secretariat that such information has been and/or can be publicly disclosed.

Signed:

Marianne Tikkanen, Head of Standard

3/4/2024

Full name of Programme Representative (*Print*)

Date signed (*Print*)

DocuSigned by:
Marianne Tikkanen
B3C6D962BB0A43A...

Programme Representative (*Signature*)

(This signature page may be printed, signed, scanned and submitted as a separate file attachment)



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Programme Application Form, Appendix B

Programme Assessment Scope

CONTENTS: With this document, programmes may define which of their activities they are submitting for assessment by the TAB. The two sheets are described below:

- Sheet A) Activities the programme describes in this form, which will be assessed by ICAO's TAB
- Sheet B) List of all methodologies / protocols that support activities described under Sheet A

SHEET A: DESCRIBED INCLUDED ACTIVITIES (Here, list activities supported by the programme that are described in this form for further assessment)

Sector	Supported activity type(s)	Implementation level(s)	Geography(ies)
e.g. Waste, Energy	e.g. Landfill methane capture; Coal mine methane capture;	e.g., Project-level only; Programmes of activities; Sector-scale	e.g., Global; Non-Annex I-only; Country X only
1_Energy / 1C_Carbon Dioxide Injection and Storage / 1C2 Injection and Storage (1C2 in IPCC figure 1)	GSC-BECCS-DACCS: Carbon removal to long-term secure storage through Injection of CO2 to geological storage captured directly from atmosphere or from a biogenic source. Fossil CO2 capture is excluded	Project-level only	Global
1_Energy / 1C_Carbon Dioxide Injection and Storage / 1C3 Other (1C3 in IPCC figure 1)	CAM-Mineralisation: Carbon removal to long-term secure storage through conversion of biogenic CO2 or direct-air captured CO2 as carbonated materials	Project-level only	Global
1_Energy / 1C_Carbon Dioxide Injection and Storage / 1C3 Other (1C3 in IPCC figure 1)	BCH-immobilising biomass: Carbon removal to long-term secure storage through conversion of biomass to recalcitrant biochar	Project-level only	Global
1_Energy / 1C_Carbon Dioxide Injection and Storage / 1C3 Other (1C3 in IPCC figure 1)	ERW-mineralisation: Carbon removal to long-term secure storage through enhancing rock weathering and mineralisation on land	Project-level only	Global
1_Energy / 1C_Carbon Dioxide Injection and Storage / 1C3 Other (1C3 in IPCC figure 1)	TSB-immobilising biomass: Carbon removal to long-term secure storage through locking biomass to engineered storages that prevent decomposition.	Project-level only	Global

Sector reference according to IPCC categories of emissions by sources and removals by sinks

Link to the IPCC document https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/0_Overview/V0_1_Overview.pdf

Figure 1 Main categories of emissions by sources and removals by sinks

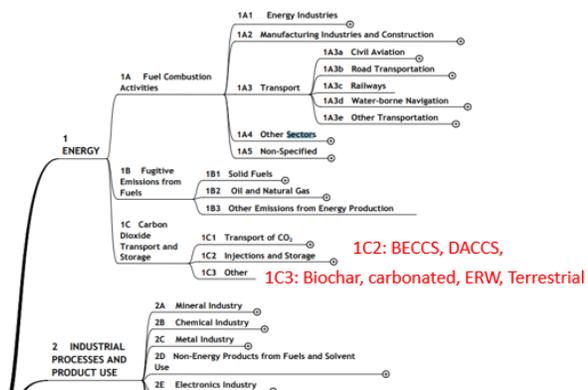
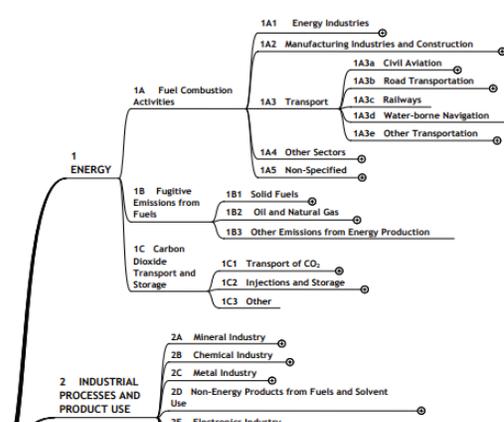


Figure 1 Main categories of emissions by sources and removals by sinks





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Programme Application Form, Appendix C

Programme Exclusions Scope

CONTENTS: With this document, programmes may define which of their activities they are **excluding** from TAB's assessment. The two sheets are described below:

- Sheet A) Activities the programme describes in this form will be **excluded** from assessment by ICAO's TAB
- Sheet B) List of all methodologies / protocols that support activities described under Sheet A

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.

DocuSigned by:
Marianne Tikkanen
B3C6D962BB0A43A...

Programme Representative Signature

Marianne Tikkanen
Programme Representative Name

Puro Standard and Registry

Programme Name

3/4/2024

Date

DocuSigned by:
Benno Fuchs
36F9784CFCE843D...

Registry Representative Signature

Benno Fuchs
Registry Representative Name

Puro Registry

Registry Name

3/4/2024

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: [Puro.earth](#)

Administering Organization⁵: [Puro.earth Oy](#)

Official mailing address: P.O. Box 1188, 00101 Helsinki, Finland

Telephone #: (+358) 40 5858848

Official web address: [Puro.earth - carbon removal standard and registry](#)

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

Full name and title: [Antti Vihavainen, Chief Executive Officer](#)

Employer / Company (if not programme): [Puro.earth Oy](#)

E-mail address: Antti@puro.earth

Telephone #: (+358) 40 5858848

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

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

⁵ **Please complete**, even if the name of the business, government agency, organization, or other entity that administers the Emissions Unit Programme is the same as "*Programme Name*".

Full name and title: Marianne Tikkanen, Head of Standard

Employer / Company (*if not Programme*): Puro.earth Oy

E-mail address: Marianne@puro.earth

Telephone #: (+358) 50 439 7779

2. Registry Representative Information⁶

A. Registry Information

Registry / system name: Puro Registry

Administering Organization: Puro.earth Oy

Official mailing address: P.O. Box 1188, 00101 Helsinki, Finland

Telephone #: (+358) 40 5858848

Official web address: [Puro.earth - carbon removal standard and registry](#)

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

Full name and title: Benno Fuchs, Chief Operating Officer

Employer / Company (*if not Registry Administering Organization*): Puro.earth Oy

E-mail address: Benno@puro.earth

Telephone #: (+49) 176 8424 0720

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

Full name and title: Marianne Tikkanen, Head of Standard

Employer / Company (*if not Registry Administering Organization*): Puro.earth Oy

E-mail address: Marianne@puro.earth

Telephone #: (+358) 50 439 7779

⁶ Please complete this section, even if the business, government agency, organization, or other entity that administers the Emissions Unit Programme Registry is the same as the organization described in **Part 2. "1. Programme Representative Information"**.

PART 3: EVIDENCE OF ADHERENCE TO SCOPE OF REGISTRY RESPONSIBILITIES

7.1	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 applicable ⁷ , 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> ”?”	<input checked="" type="checkbox"/> YES
	Describe how the Registry ensures its ability to implement these provisions:	
	Yes, Puro Registry meets the objectives and provisions.	
	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> .	
For details, please refer to the appended document “Puro Registry Description”.		

7.2	Will the Programme Registry ensure that a CORSIA participant’s request for a registry account will not be denied solely on the basis of the country in which the requestor is headquartered or based?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement this provision:	
	Yes, Puro Registry accounts are available globally for all countries. The account holder must be a corporate (not an individual consumer) and must undergo the KYC/AML procedure.	
	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> .	
For details, please refer to the appended document “Puro Registry Description”.		

7.3	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> ”?	<input checked="" type="checkbox"/> YES
	Yes, Puro Registry has the capability and will identify, on all account types, each ICAO-eligible units with a label “CORSIA eligible” as defined in the document Article 6 Procedures	
	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	

⁷ Only applicable when the Programme submits the signed “*Emissions Unit Programme Registry Attestation*” to the ICAO Secretariat after the Programme is determined to be eligible by a decision of the ICAO Council.

	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> .
	Puro.earth Article-6-procedures (hubspotusercontent-na1.net)

7.4	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?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement these provisions:	
	Yes, Puro Registry executes retirements (cancellations) requested by the account holders through MyPuro or the digital interface (API).	
	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> .	
	For details, please refer to the appended document "Puro Registry Description".	

7.5	a. Will the Programme Registry, within 1 – 3 business days of receipt of formal instruction from a duly authorized representative of the owner of an account capable of 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.	<input checked="" type="checkbox"/> YES
	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?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement these provisions:	
	a) Yes, the retirement Request is executed by Puro Registry automatically and the Retirements are visible for the public within 1 day. b) Yes, Puro Registry provides the information on cancellations Annex 16, Volume IV, and ETM, Volume IV.	
	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> .	
Puro.earth Article-6-procedures (hubspotusercontent-na1.net)		

7.6	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
	Describe how the Registry does or will implement this provision:	
	Yes, the account holders can view reports in MyPuro-	
	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> .	
	For details, please refer to the appended document "Puro Registry Description".	

7.7	a. Does the Programme Registry maintain robust security practices that ensure the integrity of, and authenticated and secure access to, the registry data of CORSIA participant account holders or participants' designees, and transaction events carried out by a user?	<input checked="" type="checkbox"/> YES
	b. Does the Programme Registry disclose documentation of such practices (row a) upon request?	<input checked="" type="checkbox"/> YES
	c. Does the Programme Registry utilize appropriate method(s) to authenticate the identity of each user accessing an account?	<input checked="" type="checkbox"/> YES
	d. Does the Programme Registry grant each user access only to the information and functions that a user is entitled to?	<input checked="" type="checkbox"/> YES
	e. Does the Programme Registry utilize appropriate method(s) to ensure that each event initiated by a user (i.e. transfer of units between accounts; cancellation/retirement of a unit, update of data, etc.) is an intentional transaction event confirmed by the user?	<input checked="" type="checkbox"/> YES
	f. Do such security features (rows a – e) meet and undergo periodic updates in accordance with industry best practice?	<input checked="" type="checkbox"/> YES
	Describe how the Registry implements each provision in rows a – f:	
	Yes, all communication in, out, and within the system is secured according to industry best practices. Puro Registry use a customer identity and access management (CIAM) to authenticate users. Authorisation to resources is on the application level based on the authenticated user's identity, application roles, and user identity bound resources. We utilise role-based access control (RBAC) to grant access to resources which the user is entitle to.	
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> .		
For details, please refer to the appended document "Puro Registry Description".		

7.8	a. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant’s designee, notify the CORSIA participant account holder or their designee?	<input checked="" type="checkbox"/> YES
	b. Will the Programme Registry, upon identifying any breach of Programme Registry data security or integrity that affects a CORSIA participant account holder or participant’s designee, notify the Programme, which will inform and engage with the ICAO Secretariat on the matter in the same manner as required for material deviations from the Programme’s application form?	<input checked="" type="checkbox"/> YES
	Describe how the Registry does or will implement each provision in rows a and b:	
	Yes, we inform account holders and the ICAO Secretariat.	
	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> .	
For details, please refer to the appended document “Puro Registry Description”.		

7.9	Does the Programme Registry ensure the irreversibility of emissions unit cancellations and the designation of the purpose of emissions units cancellations, as per the requirements contained in Annex 16, Volume IV, and ETM, Volume IV ⁸ ?	<input checked="" type="checkbox"/> YES
	Yes, Puro Registry uses a ledger-based technology stack, and such block chain transaction data is immutable by nature.	
	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> .	
	For details, please refer to the appended document “Puro Registry Description”.	

7.10	a. Does the Programme Registry ensure that all cancellation information on its website is presented in a user-friendly format?	<input checked="" type="checkbox"/> YES
	b. Does the Programme Registry ensure that all cancellation information on its website is available at no cost and with no credentials required?	<input checked="" type="checkbox"/> YES
	c. Does the Programme Registry ensure that all cancellation information on its website is capable of being searched based on data fields?	<input checked="" type="checkbox"/> YES
	d. Does the Programme Registry ensure that all cancellation information on its website can be downloaded in a machine-readable format, e.g., .xlsx?	<input checked="" type="checkbox"/> YES
	Describe how the Registry implements each provision in rows a – d:	

⁸ 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>a. Yes, The cancellation/retirement information is listed on the website in a user-friendly format with all relevant details easily viewable in tabular format.</p> <p>b. Yes, The registry website is accessible at no cost for all over the internet without restrictions.</p> <p>c. Yes, The cancellation/retirement information is searchable in the downloadable files or on the website.</p> <p>d. Yes, The website allows the user to download the search results as a comma-separated values (CSV) file or as an Excel (XLSX) 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>https://registry.puro.earth/</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, The Puro Standard General Rules v.4.0, paragraph 1.4.2 “The Issuing Body is responsible for the retention of all records for a minimum of 5 years.”</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>Weblink to General Rules: Puro.earth_General-Rules_v.4.0.pdf (hubspotusercontent-na1.net)</p> <p>For details, please refer to the appended document “Puro Registry Description”.</p>	