

## **CORSIA Eligible Emissions Unit Programme Change Notification Form**

*Version 2.0; Effective from 10 January 2022*

### **PART A: ABOUT THIS FORM**

Once an emissions unit programme is approved by the ICAO Council as eligible to supply CORSIA Eligible Emissions Units, the programme commits to notify the ICAO Secretariat of any “material changes” to its “Scope of Eligibility”, *including any unilateral decision to revoke or invalidate a class of CORSIA-eligible emission units within the programme’s Scope of Eligibility*, for further review<sup>1</sup> by the Technical Advisory Body (TAB) that advises the ICAO Council on the eligibility of emissions units for use in CORSIA.

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

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

Annually, TAB will indicate deadlines for programmes to notify ICAO of any such material changes. These notifications should be submitted by the next deadline after the material change has occurred; the upcoming deadlines are indicated in the version of the *TAB Work Programme and Timeline* document that is currently effective. This document is available on the CORSIA website<sup>3</sup>.

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

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

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

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

**PART B: PROGRAM CHANGE NOTIFICATION(S)**

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

**Programme name:** American Carbon Registry (ACR)

<b>CHANGE 1</b>
a. Description of the change (e.g., the addition, modification, deletion undertaken): ACR has updated general Programme Information as follows:  The official mailing address has changed to: 325 W Capitol Avenue, Suite 350, Little Rock, Arkansas 72201.  An additional telephone number is: +1 571-402-4235  The official web address has changed to: <a href="https://acrcarbon.org/">https://acrcarbon.org/</a>
b. Rationale for the change: This is the new address of the headquarters of Winrock International, ACR's parent organization, ACR-specific phone number, and updated website address.
c. Where the change is reflected in the Programme's documentation or other resource(s) <sup>4</sup> : The updated information is available on the ACR website: <a href="https://acrcarbon.org/">https://acrcarbon.org/</a> .
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility: References to the mailing address, as related to changes noted above, were included in the March 2022 Re-assessment Application, including:  <i>Section III, Part I, A. Programme Information</i> Official mailing address: 204 E 4th street, North Little Rock, AR 72114 Telephone #: +1 (703) 302-6500 Official web address: <a href="http://www.americancarbonregistry.org">www.americancarbonregistry.org</a>
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change: Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application for the 2027-2029 compliance phase noting that the updates do not change the scope of eligibility in the current ICAO Eligible Emissions Units document. We would be happy to answer any additional questions ICAO may have.

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

<b>CHANGE 2</b>
a. Description of the change (e.g., the addition, modification, deletion undertaken):
While not a material change since this update is as a result of having followed ACR's policies, procedures and approaches as previously described to the TAB, ACR has made methodologies inactive for new project listings and has updated methodologies. This does not impact the scope of eligibility of credits being labelled as CORSIA Eligible per the ICAO Eligible Emissions Unit document.
b. Rationale for the change:
Per the ACR Standard, ACR periodically reviews its approved methodologies and associated performance standards. ACR may inactivate methodologies if the performance standard needs review or the activities or MRV methods are deemed to no longer meet ACR requirements. This status does not impact projects during the crediting period, but does not allow for new listings. ACR may update methodologies based on new technical or market information and/or develop and approve new methodologies.
c. Where the change is reflected in the Programme's documentation or other resource(s) <sup>5</sup> :
The change is noted publicly on the "Standards & Methodologies" webpage of ACR's website: <a href="https://americancarbonregistry.org/carbon-accounting/standards-methodologies">https://americancarbonregistry.org/carbon-accounting/standards-methodologies</a>
d. Information originally submitted to and assessed by TAB that would be altered as a result of this change (copy and paste in the field below); including any and all relevant descriptions or explanations provided by the Programme in its Application Form and accompanying materials and/or in response to any further inquiries from TAB during the course of the assessment(s) that informed TAB recommendations on the Programme's current eligibility:
References to individual methodologies, as related to changes noted above, were included in the March 2022 Re-assessment Application, including:  <i>Section III, Part 3, Question 3.2. Scope considerations (referring to ACR's original application July 2019)</i> d) A list of methodologies with a 10 year crediting period  <i>Section III, Part 4, Question 4.1. Are additional (referring to ACR's response to TAB live discussion questions November 2019)</i> ii. A list of methodologies with practice-based performance standards  <i>Section III, Part 4, and Question 4.1. Are additional (referring to ACR's original application July 2019)</i> A table showing which method of additionality each ACR-approved methodology employs  <i>Section III, Part 4, Question 4.6. Assess and mitigate against potential increase in emissions elsewhere (referring to ACR's original application July 2019)</i> A list of activity types that present potential risk of material emissions leakage and methodologies that include required deductions for leakage.
e. How the information in "d." would be revised and submitted to any future (re-)assessment process, by updating the information in "d." to reflect any / all modifications to the Programme's original information that result from the change:
Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application for the 2027-2029 compliance phase noting that the updates do not change the scope of eligibility in the current ICAO Eligible Emissions Units document. We would be happy to answer any additional questions ICAO may have.

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

### CHANGE 3

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

ACR updated Registry functionality to:

1. Enable the Registry Administrator to label credits as CORSIA Eligible at the sub-batch level (e.g., in the event of a Host Country authorizing credits for use that are only a subset of a credit issuance). Since credits from a single issuance may now have different CORSIA Eligible designations, the CORSIA Eligible field has been removed from the Project Credits Issued public report (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=112>), which groups credits together by issuance batch. The CORSIA Eligible field is instead visible on screens and reports that display credits at the holding-level, listed below.
  - Paris Agreement Article 6 and CORSIA public report (new report, see #3 below) (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=213>)
  - Credit Status public report (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=309>)
  - Retired Credits public report (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=206>)
  - Canceled Credits public report (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=208>)
  - Holding-level Credit Details screen, accessed by clicking on the hyperlinked Quantity of Credits field within such public reports
2. Enable Account Holders to request CORSIA Pending credits to be labeled as CORSIA Eligible (requests should only be made, and will only be approved, if all ICAO's Emission Unit Criteria requirements have been met and, for post-2020 vintage carbon credits, ACR is in receipt of a Host Country Letter of Authorization and Project Proponent submission of an ACR-approved CORSIA Double Claiming Compensation Mechanism).
3. Add new fields to transparently identify the relevant CORSIA compliance period(s) for which units are CORSIA Eligible. These are found in the same screens and reports as the CORSIA Eligible field, as listed in #1 above.
4. Introduce a Paris Agreement Article 6 and CORSIA public report (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=213>) to display the information required in the CORSIA SARPs Appendix 5, Table A5-7 and indicate whether a corresponding adjustment has been applied.

The report populates with credits that meet any of the following criteria:

- CORSIA Eligible (any vintage)
- CORSIA Pending (post-2020 vintage, ICAO's Emission Unit Criteria requirements have been met but designation as CORSIA Eligible is contingent upon receipt of a Host Country Letter of Authorization and Project Proponent submission of an ACR-approved CORSIA Double Claiming Compensation Mechanism)
- Host Country Letter of Authorization has been accepted

The report can be filtered within the ACR Registry user interface or via a downloaded, machine-readable .csv file to sort exclusively for credits by any field, including:

- Canceled for the purpose of making a claim under CORSIA (Cancellation Type field = "CORSIA Compliance");
- Canceled for a specific Compliance Period (CORSIA Compliance Period = "Pilot Phase 2021-2023" or "First Phase 2024-2026" and/or
- Canceled on behalf of a particular airline (i.e., Aeroplance Operator = X).

5. Add text to transparently disclose the meaning of "CORSIA Pending" on all screens and reports where the CORSIA Pending attribute is displayed.
  - Paris Agreement Article 6 and CORSIA public report (new report, see #3 below) (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=213>)

- Holding-level Credit Details screen, accessed by clicking on the hyperlinked Quantity of Credits field within the Credit Status public report (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=309>), Retired Credits public report (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=206>), and Canceled Credits public report (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=208>)

The text reads:

\*A CORSIA Pending carbon credit is a tag on a carbon credit to designate it as capable of meeting the full eligibility criteria for CORSIA Eligible but that those requirements are not yet fully met. For 2016-2020 vintage carbon credits, a CORSIA Pending designation could indicate that the Project Developer may need to supply additional information or that the contribution to the Buffer Pool associated with that batch of credits were not CORSIA Eligible credits as required for the CORSIA Eligible designation. For post-2020 vintage carbon credits, a CORSIA Pending designation communicates that ICAO's Emission Unit Criteria requirements have been met but designation as CORSIA Eligible is contingent upon receipt of a Host Country Letter of Authorization and Project Proponent submission of an ACR-approved CORSIA Double Claiming Compensation Mechanism.

6. Renamed the "CORSIA Letter of Assurance and Authorization" document type to "Host Country Letter of Authorization"

**b. Rationale for the change:**

These updates were made to align with the ICAO Council's requests and ensure functionality for anticipated use cases consistent with international mitigation purposes.

**c. Where the change is reflected in the Programme's documentation or other resource(s)<sup>6</sup>:**

The change is reflected on the ACR Registry <https://acr2.apx.com/> in public reports and screens named in section a above.

The ACR Registry Operating Procedures ([https://acrcarbon.org/program\\_resources/registry-operating-procedures/](https://acrcarbon.org/program_resources/registry-operating-procedures/)) were also updated to reflect these changes. Updates were made as follows:

- Updated Section 3.2, Levels of Account Access and Login Permissions, to specify the ability for users to request updates to CORSIA Eligibility for carbon credits in their account labeled as CORSIA Pending.
- Added Section 7.8, Requests for Updating Credit CORSIA Eligibility to detail the process for users to request an updated status.
- Updated Section 8.1, Public Reports, to add the Paris Agreement Article 6 and CORSIA public report, modify the list of fields displayed in the Project Credits Issued public report, and differentiate between the batch-level and holding-level credit details screens.
- Updated Section 8.2, Account Holder Reports, to add the Paris Agreement Article 6 and CORSIA screen, and update the holding-level credit details screens.
- Updated Section 8.3, Credit Labeling, and the Glossary, to provide greater clarity on the CORSIA Eligible and CORSIA Pending designations.

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

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

References to Registry functionality, as related to changes noted above, were included in the March 2022 Re-assessment Application, including:

*Section III, Part 3, Question 3.4 Identification and Tracking (referring to ACR's original application July 2019)*

- a) ACR's registry platform currently includes an internal "ARB Eligible" designation for each of the issued serialized credit batches to indicate which ones are eligible for conversion to ARBOCs under the California State Cap-and-Trade program, and conversely which ones are strictly voluntary program credits. ACR's public report of Credits Issued (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=112>) shows the current "ARB Eligible" distinction. Similarly, this kind of distinction could be easily created to display CORSIA eligibility status for credits issued on ACR.

*Section III, Part 3, Question 3.4 Identification and Tracking (referring to ACR's Programme Clarification Oct 2019)*

- a) ACR's registry platform currently includes an "ARB Eligible" designation for each of the issued serialized credit batches to indicate which ones are eligible for conversion to ARBOCs under the California State Cap-and-Trade program, and conversely which ones are strictly voluntary program credits. ACR's public report of Credits Issued (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=112>) shows the current "ARB Eligible" distinction.

*Section III, Part 3, Question 3.4 Identification and Tracking (referring to ACR's Registry Attestation March and April 2021)*

- f) Those with confirmed eligibility can be marked as "CORSIA Eligible" in the registry which will be noted on the Credit Details screen that appears upon clicking on a number of credits... ACR's public report of Credits Issued (<https://acr2.apx.com/myModule/rpt/myrpt.asp?r=112>)

Over 40 references to "Letter of Assurance and Authorization" which can now be read as "Host Country Letter of Authorization" without change to the way ACR engages with these letters.

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

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application for the 2027-2029 compliance phase noting that the updates do not change the scope of eligibility in the current ICAO Eligible Emissions Units document. We would be happy to answer any additional questions ICAO may have.



**CHANGE 4****a. Description of the change (e.g., the addition, modification, deletion undertaken):**

While not a material change since this update is as a result of having followed ACR's policies, procedures and approaches as previously described to the TAB, ACR approved an updated version of the Tool for Reversal Risk Analysis and Buffer Pool Contribution (Risk Tool) for use by Agriculture, Forestry, and Other Land Use (AFOLU) carbon projects with a risk of reversal to perform a Reversal Risk Analysis and determine its Buffer Pool Contribution Percentage. At a portfolio level, ACR expects most projects to have roughly the same overall risk rating and buffer pool contribution obligation under the new tool. At a more granular level, the updated Risk Tool intentionally introduces more project-specific inputs (that are validated) and appropriately results in higher-risk projects contributing more to the buffer pool while lower-risk projects contribute less. This ultimately, and beneficially, incentivizes project development in low-risk circumstances and the implementation of mitigation measures in higher-risk circumstances. ACR cannot offer a discrete range for the overall project risk ratings due to the more project-specific nature of the evaluation and some of the external tools that projects are instructed to refer to utilizing a sliding scale.

As was previously the case, the ACR Buffer Pool only compensates for Unintentional Reversals and thus, the Risk Tool assesses only unintentional types of risks. The Risk Tool continues to operate in conjunction with the ACR Buffer Pool Terms and Conditions and the legally binding AFOLU GHG Project Reversal Risk Mitigation Agreement between ACR and Project Proponents.

**b. Rationale for the change:**

Version 2.0 of the Risk Tool introduces new methods and requirements for calculating project-specific and spatially explicit risks to the permanence of emission reductions and/or removals that are the result of natural disturbances and would be considered an "Unintentional Reversal". The updated Risk Tool leverages published, publicly available, and geographically specific mapping datasets to determine natural disturbance risks and associated Buffer Pool Contribution Percentages.

**c. Where the change is reflected in the Programme's documentation or other resource(s)<sup>7</sup>:**

The updated Risk Tool is available on ACR's website: [https://acrcarbon.org/program\\_resources/acr-risk-tool/](https://acrcarbon.org/program_resources/acr-risk-tool/).

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

References to reversal risk assessment, as related to changes noted above, were included in the March 2022 Re-assessment Application, including:

*Section III, Part 3, Question 4.5. Represent permanent emissions reductions (referring to ACR's original application July 2019)*

For terrestrial sequestration projects, ACR requires risk to be assessed using the ACR Tool for Risk Analysis and Buffer Determination, which is found here:

<https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/acr-risk-tool-v1-0.pdf/view>.

The assessment results in an overall risk rating for the project, which ranges from 13% to 33%, based on general and project-specific risk factors.

The risk assessment requires scoring risks in categories including financial risk, project management risk and social and political risk and assesses the likelihood of natural disasters by assigning a higher risk to areas more prone to fire, disease, pests and water table changes.

<sup>7</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.

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

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application for the 2027-2029 compliance phase noting that the updates do not change the scope of eligibility in the current ICAO Eligible Emissions Units document. We would be happy to answer any additional questions ICAO may have.

#### **CHANGE 5**

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

ACR published an Industrial Projects Desk-Based Review Policy, describing the circumstances where desk-based reviews (in lieu of site visits are allowable for certain ACR methodologies.

b. Rationale for the change:

The policy applies to certain single reporting period, industrial project types where the VVB and lead verifier have previously completed a site visit at the same facility for another project developed by the Project Proponent (or Project Developer) under the same ACR methodology and version within 12 months of when validation/verification services are expected to commence for the desk-based review. Other requirements, as detailed in the policy, must be met that ensure continuity at the facility since the last site visit such as no changes to the processes and equipment or ownership of the facility as well as no changes to the relevant methodology’s Errata and Clarifications that apply to activities at the facility.

Allowing desk-based reviews under these circumstances can streamline and reduce validation/verification costs while still providing assurance that the requirements of the ACR Standard and methodology are met. Desk-based reviews must be approved by ACR.

c. Where the change is reflected in the Programme’s documentation or other resource(s)<sup>8</sup>:

The policy is available from ACR’s Validation and Verification website under the “Validation and Verification Interval” section and available for download at [https://acrcarbon.org/program\\_resources/ip-desk-based-review-policy/](https://acrcarbon.org/program_resources/ip-desk-based-review-policy/)

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

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<sup>8</sup> If documents or resources evidencing the change are not publicly available, please include this information in an attachment to this form and clearly identify any business-confidential information.



References to verification site visits, as related to changes noted above, were included in the March 2022 Re-assessment Application, including:

*Section III, Part 3, Question 4.3. Are quantified, monitored, reported, and verified (referring to ACR's original application July 2019)*

- d) No less than once every 5 years, Project Proponents must submit a verification statement based on a full verification including a field visit to the project site.

Regarding verification intervals, per the ACR Validation and Verification Standard Chapter 8 – Section 8.C:

- i. A desk-based verification audit at each request for issuance of new ERTs. This is usually conducted annually, but may be more or less frequent at the discretion of the Project Proponent.
- ii. A full verification including a field visit at the first verification and again at least every 5 years. Field verifications may be conducted more frequently (e.g., in the case of changes in monitoring and data management practices, or for particular project types with material parameters that can only be verified on site). Generally, for most project types, field verification is required at minimum every 5 years.

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

Unless otherwise required by ICAO, ACR intends this document to reference the updates to our application for the 2027-2029 compliance phase noting that the updates do not change the scope of eligibility in the current ICAO Eligible Emissions Units document. We would be happy to answer any additional questions ICAO may have.