

Please note that the attached translation is an excerpt from Section 4 of the TAB Report of August 2024

4 TAB ASSESSMENTS AND RECOMMENDATIONS ON APPLICATIONS AND PROCEDURAL UPDATES

4.1 GENERAL ELIGIBILITY PARAMETERS FOR CORSIA COMPLIANCE PERIODS

CORSIA first phase (2024-2026 compliance period)

4.1.1 At its 228th session in March 2023, the Council approved the general eligibility parameters for application in CORSIA’s first phase (2024-2026 compliance period) (C-DEC 228/7), as recommended in section 4.1.2 of TAB’s January 2023 report to Council. These general eligibility parameters apply to all CORSIA Eligible Emissions Units that are approved by the ICAO Council for use in the CORSIA first phase (2024-2026 compliance period), in addition to any programme-specific eligibility parameters recommended for a particular programme:

- a) eligible for cancellation for use toward CORSIA offsetting requirements in the **2024-2026 compliance period** (hereafter *eligibility timeframe*); and
- b) issued:
 - 1) to activities that started their first crediting period from **1 January 2016**; and
 - 2) in respect of emissions reductions that occurred **from 1 January 2021 through 31 December 2026**.

4.1.2 *Extension of unit date eligibility:* The date(s) in paragraph 4.1.1 above may only be extended to apply to eligibility timeframes beyond the CORSIA first phase (2024-2026 compliance period), and/or eligible unit dates after 31 December 2026, subject to the Council decision and TAB recommendations. In its 2025 re-assessment cycle, TAB will undertake re-assessments of programmes eligible at that time, in order to make recommendations to Council on the extension of their eligibility dates into the 2027-2029 compliance period. TAB may recommend such an extension to the Council where TAB’s analysis identifies that an emissions unit programme is fully consistent with all of the EUC and guidelines when assessing the eligibility of emissions units with eligibility dates beyond 31 December 2026.

CORSIA pilot phase (2021-2023 compliance period)

4.1.3 At its 219th session in March 2020, the Council approved the general eligibility parameters for application in CORSIA’s pilot phase (2021-2023 compliance period) (C-DEC 219/6), as recommended in section 4.1 of TAB’s January 2021 report to Council. In accordance with the TAB Procedures, TAB is no longer inviting new applications for eligibility for the pilot phase only.¹¹ All previously eligible programmes re-assessed for this report to Council continue to be eligible for the pilot phase, subject to their existing eligibility parameters set out in section I of the ICAO document titled “CORSIA Eligible Emissions Units”.

4.2 2024 TAB ASSESSMENT CYCLE: SUMMARY OF RECOMMENDATIONS

4.2.1 In its 2024 assessment cycle, TAB assessed applications from organizations seeking to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period). In parallel, TAB assessed material changes submitted by programmes that are conditionally eligible for the first phase (2024-

¹⁰ Refers to the “Host country attestation to the avoidance of double-claiming” guideline for interpretation of the “Only counted once towards a mitigation obligation” criterion, in *Application Form Appendix A - Supplementary Information*, paragraph 3.7.

¹¹ Paragraph 7.8 of the TAB Procedures sets out the three-year cycle for TAB assessments and re-assessments.

2026 compliance period). In accordance with the TAB Procedures, TAB is no longer inviting new applications for eligibility for the pilot phase.¹²

4.2.2 TAB's recommendations to Council from its 2024 assessment cycle are summarized in this section below. Section 4.3 then presents the full details of each recommendation, including any programme-specific eligibility parameters and further actions requested of each programme.

Eligibility for CORSIA first phase (2024-2026 compliance period)

4.2.3 Programmes recommended for immediate eligibility

4.2.3.1 In this report, TAB recommends the following four programmes for approval as immediately eligible to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period):

- Climate Action Reserve (CAR) (see details in section 4.3.2)
- Global Carbon Council (GCC) (see details in section 4.3.3)
- Gold Standard (see details in section 4.3.4)
- Verified Carbon Standard (VCS) (see details in section 4.3.5)

4.2.3.2 For clarity, the two other programmes that Council had previously approved for this phase should continue to be fully eligible, in line with their existing parameters set out in section II of the ICAO document titled "CORSIA Eligible Emissions Units": American Carbon Registry (ACR) and Architecture for REDD+ Transactions (ART). TAB recommends that the ICAO Secretariat communicate the Criteria interpretations in section 4.4 of this report to the currently eligible programmes and that Council request them to take action as appropriate.

4.2.4 Programmes recommended for conditional eligibility

4.2.4.1 TAB recommends that the Council's designation of the following emissions unit programmes should be approved as conditionally eligible for the first phase (2024-2026 compliance period), pending the completion of further actions set out in section 4.3:

- BioCarbon Fund Initiative for Sustainable Forest Landscapes (ISFL) (see details in section 4.3.6)
- Cercarbono (see details in section 4.3.8)
- Forest Carbon Partnership Facility (FCPF) (see details in section 4.3.9)
- Isometric (see details in section 4.3.10)
- Premium Thailand Voluntary Emission Reduction Program (T-VER) (see details in section 4.3.11)

4.2.4.2 For clarity, TAB is not recommending that these programmes be approved to supply CORSIA Eligible Emissions Units at this stage (*i.e.*, immediately added to section II of the ICAO document "CORSIA Eligible Emissions Units"). Rather, TAB will confirm to Council when programme updates meet specified conditions; *then* the programme will be added to the ICAO document "CORSIA Eligible Emissions Units" for the first phase (2024-2026 compliance cycle).

4.2.5 Programmes invited to re-apply

4.2.5.1 TAB recommends that the following emissions unit programmes should be invited to re-apply:

¹² Paragraph 7.8 of the TAB Procedures sets out the three-year cycle for TAB assessments and re-assessments.

- BioCarbon Standard (BCR) (see details in section 4.3.13)
- KCCI Carbon Standard (KCS) (see details in section 4.3.14)
- Puro.earth (see details in section 4.3.15)
- Reverse (see details in section 4.3.16)

4.2.6 **Applications not possible to assess**

4.2.6.1 TAB was unable to fully assess the following applicant organizations at this stage, due to either their early stage of development, or because key elements of an emissions unit programme, in line with the EUC and their guidelines, were not in place at the time of TAB’s assessment:

- Asia Carbon Institute (ACI) (see details in Section 4.3.18)
- C-Capsule (see details in Section 4.3.19)
- Carbon Asset Solutions (CAS) (see details in Section 4.3.20)
- Ecosystem Restoration Standard (ERS) (see details in Section 4.3.21)
- International Carbon Registry (ICR) (see details in Section 4.3.22)
- POPL Standard (see details in Section 4.3.23)

4.3 **2024 TAB ASSESSMENT CYCLE: DETAILED RECOMMENDATIONS**

Assessments for the CORSIA first phase (2024-2026 compliance period)

4.3.1 **Programmes recommended for immediate eligibility**

4.3.1.1 In this report, TAB recommends the following four programmes for approval as immediately eligible to supply CORSIA Eligible Emissions Units for the first phase (2024-2026 compliance period):

- Climate Action Reserve (CAR) (see details in section 4.3.2)
- Global Carbon Council (GCC) (see details in section 4.3.3)
- Gold Standard (see details in section 4.3.4)
- Verified Carbon Standard (VCS) (see details in section 4.3.5)

4.3.1.2 For clarity, the two other programmes that Council had previously approved for this phase should continue to be fully eligible, in line with their existing parameters set out in section II of the ICAO document titled “CORSIA Eligible Emissions Units”: American Carbon Registry (ACR) and Architecture for REDD+ Transactions (ART). TAB recommends that the ICAO Secretariat communicate the Criteria interpretations in section 4.4 of this report to the currently eligible programmes and that Council request them to take action as appropriate.

4.3.2 **Climate Action Reserve**

4.3.2.1 TAB recommends that Climate Action Reserve should be approved as immediately eligible to supply CORSIA eligibility emissions units for the first phase (2024-2026 compliance period). The eligibility of the emissions units should be subject to the general eligibility parameters set out in section 4.1.1 above and the programme-specific parameters set out for the programme in paragraph 4.3.12 of this report, which should be clearly described in section II of the ICAO document titled “CORSIA Eligible Emissions Units”.

Background on programme status

4.3.2.2 Climate Action Reserve (“the Reserve”) first applied for assessment by the TAB in July 2019. In March 2020, the Council accepted TAB’s recommendation that the Reserve should be eligible for pilot phase (2021-2023 compliance period).

4.3.2.3 The Reserve applied for re-assessment by the TAB in March 2022. Council approved TAB’s recommendation that the programme be conditionally eligible for the first phase (2024-2026 compliance period) in March 2023, pending programme’s implementation of further actions requested by the Council.

4.3.2.4 In August 2023, the Reserve submitted procedural updates for TAB’s material change assessment. As further explained in its January 2024 Report to Council,¹³ TAB found that the Reserve demonstrated technical consistency with some, but not all, contents of the following criteria: Leakage; and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.2.3.12 of TAB’s January 2024 Report (see section 4.3.2.5 below). TAB also found that the Reserve demonstrated technical consistency with most, but not all, contents of the criteria Additionality and Permanence – these findings informed TAB’s recommendation on new Programme-specific eligibility parameters during the CORSIA pilot phase.

4.3.2.5 In March 2024, the Council reiterated the decision that the programme be conditionally eligible for the first phase and updated the list of *Further actions requested of the programme*. The Reserve was requested to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB’s review and recommendation and Council’s consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- a) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant Guidelines, mindful of TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement contained in the document *Clarifications of TAB’s Criteria interpretations*. Further actions should address the following:
 - i. Clearly state in the Reserve’s procedures that all emissions units representing mitigation that occurred from 1 January 2021 onward and are used in the CORSIA must be appropriately accounted for in line with the relevant and applicable international provisions, as stated in the EUC Guidelines, in particular through corresponding adjustments by the host country consistent with Article 6.2 Guidance under the Paris Agreement, regardless of the sector, gas, activity type or country in which the mitigation occurred;
 - ii. Establish procedures for the programme to respond to changes to the number, scale, and/or scope of host country attestations;
 - iii. Review and update section 2.11.1 of the Reserve Offset Program Manual, in order to ensure that the timing and information sought in different national reports is consistent their respective contents per the Article 6.2 Guidance, so that the Reserve and Project Developers have the correct instructions needed to meet their responsibilities under the Reserve’s procedures for comparing unit use against national reporting;

¹³ Appendix B of CWP-15563

- iv. Provide evidence of the basis by which a Project proponent legally commits to replace double-claimed mitigation in line with section 2.11.1.2 of the Reserve Program Offset Manual, *e.g.*, contract template excerpt; and,
- v. Provide documentation to TAB on the Reserve’s formal procedures for addressing instances where a Project Developer is unwilling or unable to compensate for double-claimed mitigation in line with section 2.11.1.2 of the Reserve Program Offset Manual.

4.3.2.6 Also in March 2024, Council to re-iterated items a) to c) on the list of *Further actions requested* per paragraph 4.2.3.7 of TAB’s January 2023 Report to Council, which did not need to be taken prior to adding the Reserve to section II of the ICAO document titled “CORSIA Eligible Emissions Units”:

- a) At the earliest opportunity, update, or finalize updates to, the programme registry to enhance consistency with all requirements in the Emissions Unit Programme Registry Attestation, Part B, Paragraph 7.10, including for the registry to record cancellation information required in the CORSIA SARPs Appendix 5, Table A5-7¹⁴, through discrete, standardized fields in a downloadable format;
- b) Update the programme registry functionality to transparently identify the relevant CORSIA compliance period(s) for which units are CORSIA-eligible;
- c) At the earliest opportunity, but no later than TAB’s re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

Summary of material procedural updates

4.3.2.7 In April 2024, the Reserve submitted updates (as “material changes”) to programme procedures designed to address the further actions requested by Council described in para 4.3.2.5 above.

General findings

4.3.2.8 In its 2024 material change assessment cycle, TAB found that the Reserve’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023, supplemented by material changes submitted for TAB’s assessment in April 2024, were largely consistent with the contents of the EUC as TAB applied them in its assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026 that are within the programme-specific eligibility parameters noted in section 4.3.2.12 below.

4.3.2.9 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB’s interpretation that “conservative” means that procedures should provide for baselines that are set “in a conservative way *and below the business-as-usual emissions projections*”, following from

¹⁴ Required fields for reporting emissions unit cancellations: Aeroplane operator in whose name the unit was cancelled {name}; Compliance period {for which units were cancelled}; Quantity of units cancelled {in a given batch}; Start of serial number range {by batch}; End of serial number range {by batch}; Date of cancellation; Name of programme; Unit type {e.g., VER, CRT}; Host country; Methodology {alpha/numeric identifier}; Unit vintage {year}.

TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB's January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.2.14 below.

4.3.2.10 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Leakage. For activities that involve replacing equipment or other physical systems, this criterion addresses emissions from the replaced equipment, *e.g.*, from its disposal/decommissioning, continued use, *etc.* This finding informed the *Further actions requested* of the programme set out in section 4.3.2.14 below.

4.3.2.11 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Only counted once toward a mitigation obligation. This finding is discussed in section 4.4.6 further down and informed the Programme-specific eligibility parameter set out in sections 4.3.2.12 and 4.3.2.13 below

Programme-specific eligibility parameters

4.3.2.12 The Reserve submitted for TAB's assessment most, but not all, activity types and scales, unit types, methodologies, and procedural categories supported by the programme. TAB recommends the following exclusions and limitations to the programme's scope of eligibility, which should be reflected in section II of the ICAO document titled "CORSIA Eligible Emissions Units": (1) the general eligibility parameters in Section 4.1.1, (2) Reserve's existing programme-specific eligibility parameters for the pilot phase set out in Part I of ICAO document titled "CORSIA Eligible Emissions Units", and (3) the following additional exclusion applicable for the first phase (2024-2026 compliance period):

- e) CRTs issued in respect of emissions reductions for which the programme has not yet verified, in accordance with its procedures, that the corresponding adjustment has already been applied and fully reflected in the host country's biennial transparency report (BTR)

4.3.2.13 TAB also recommends making consequential amendments to Part I of the ICAO document "CORSIA Eligible Emissions Units", in order to extend the programme's *Eligible Unit Dates* for the CORSIA pilot phase (2021-2023 compliance period) through 31 December 2023, subject to the following exclusion:

- h) CRTs issued in respect of emissions reductions that occurred from 1 January 2021 onward for which the programme has not yet verified, in accordance with its procedures, that the corresponding adjustment has already been applied and fully reflected in the host country's biennial transparency report (BTR)

Further actions requested of the programme

4.3.2.14 TAB also recommends that Council re-iterate the *Further actions requested* in March 2023 and March 2024 (see section 4.3.2.6 above), with the addition of items (d) to (f) below, which do not need to be taken prior to updating the Reserve's description in the ICAO document titled "CORSIA Eligible Emissions Units":

- d) Establish a mechanism for Climate Action Reserve, and/or the proponents of the activities it supports, to mitigate their operational risks associated with the implementation of the guideline

Reconciliation of double-claimed mitigation, in order to provide reasonable assurance that they have the capability to deliver on their commitments,

- e) Update the programme's procedures to ensure that a CORSIA eligibility label for the 2024-2026 compliance period is applied to all units issued by Climate Action Reserve within the Scope of Eligibility set out in Section II of the ICAO document titled "CORSIA Eligible Emissions Units", and that no such label can be removed within the same compliance period without triggering the Reserve's *Reconciliation* procedures.
- f) Update programme-level requirements and procedures relating to Leakage, including to ensure that, where an activity involves replacing equipment or other physical systems such that these comprise the activity's baseline, the baseline equipment is demonstrably decommissioned, destroyed, or scrapped, or otherwise demonstrated to no longer be in use, and emissions from its disposal are discretely assessed, mitigated where possible, and deducted from the verified results of the activity; or where procedures enable the baseline equipment to potentially be re-sold or otherwise remain in use (including beyond the project boundary), equivalent procedures for assessment, mitigation, and accounting deductions should also apply to emissions resulting from its continued use.

4.3.3 Global Carbon Council (GCC)

4.3.3.1 TAB recommends that Global Carbon Council should be approved as immediately eligible to supply CORSIA eligibility emissions units for the first phase (2024-2026 compliance period). The eligibility of the emissions units should be subject to the general eligibility parameters set out in section 4.1.1 above and the programme-specific parameters set out for the programme in paragraph 4.3.3.14 of this report, which should be clearly described in section II of the ICAO document titled "CORSIA Eligible Emissions Units".

Background on programme status

4.3.3.2 GCC first applied (as 'Global Carbon Trust') for assessment by the TAB in July 2019. In March 2020, the Council accepted TAB's recommendation that the GCC should be conditionally eligible for pilot phase (2021-2023 compliance period), pending GCC's implementation of further actions requested by the Council. Following TAB's assessment of these further actions, Council approved TAB's recommendation that GCC be fully eligible for the pilot phase in March 2021.

4.3.3.3 GCC applied for re-assessment by the TAB in March 2022. Council approved TAB's recommendation that GCC be conditionally eligible for the first phase (2024-2026 compliance period) in March 2023, pending GCC's implementation of further actions requested by the Council.

4.3.3.4 In April 2023, GCC submitted procedural updates for TAB's material change assessment. TAB found that GCC demonstrated technical consistency with some, but not all, contents of the following criteria: Identification and tracking; Carbon offset credits must be based on a realistic and credible baseline, and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.3.6.11 of the September 2023 TAB Report to Council.

4.3.3.5 In November 2023, the Council re-iterated its decision that GCC should be conditionally eligible for the first phase and updated the list of *Further actions requested of the programme*. Council requested GCC take the following actions to satisfy its eligibility conditions, and to provide evidence of

such for TAB's review and recommendation and Council's consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- a) Update its programme standard and procedures to require, until GCC fulfills the condition in para. (b) below, that C+ and CA+ labels may only be applied to units with post-2020 vintages *after* GCC has verified that these specific units are fully reflected in the host country's biennial transparency report (BTR), following GCC's *Standard on Avoidance of Double Claiming of Mitigation Outcomes in Host Country NDCs* shared with TAB in draft form,
- b) If GCC wishes to be able to apply the C+ or CA+ label to ACCs *before* GCC has verified that they are fully and specifically reflected in the host country's biennial transparency report (BTR), enhance or replace sections 4.1 – 4.3 (buffer account guidelines) in the *Standard on Avoidance of Double Claiming of Mitigation Outcomes in Host Country NDCs* that was shared with TAB in draft form, in order to ensure that the program, or proponents of the activities it supports, fully compensate for, replace, or otherwise reconcile double-claimed mitigation associated with these units,
- c) Finalize and publish all other amendments to the *Standard on Avoidance of Double Claiming of Mitigation Outcomes in Host Country NDCs* that were shared with TAB in draft form, with further enhancements to address elements relating to para. (a) and (b) above,
- d) Put procedures in place for GCC to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon.

4.3.3.6 Also in November 2023, Council requested GCC to undertake the following further actions, which would not need to be taken prior to updating GCC's description in the ICAO document titled "CORSIA Eligible Emissions Units". These requested further actions supersede such actions requested by Council in March 2023 (see section 4.2.6.6 of the January 2023 TAB Report):

- a) At the earliest opportunity, update, or finalize updates to, the programme registry to enhance consistency with all requirements in the Emissions Unit Programme Registry Attestation, Part B, Paragraph 7.10, including for the registry to record cancellation information required in the CORSIA SARPs Appendix 5, Table A5-7¹⁵, through discrete, standardized fields in a downloadable and machine-readable format (e.g., XLS, CSV), that is available to public users at no cost and with no credentials required;
- b) Update the programme registry functionality to transparently label the specific CORSIA compliance period(s) for which units are CORSIA-eligible; and,
- c) At the earliest opportunity, but no later than TAB's re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

¹⁵ Required fields for reporting emissions unit cancellations: Aeroplane operator in whose name the unit was cancelled {name}; Compliance period {for which units were cancelled}; Quantity of units cancelled {in a given batch}; Start of serial number range {by batch}; End of serial number range {by batch}; Date of cancellation; Name of programme; Unit type {e.g., VER, CRT}; Host country; Methodology {alpha/numeric identifier}; Unit vintage {year}.

Summary of material procedural updates

4.3.3.7 In April 2024, the GCC submitted updates (as “material changes”) to programme procedures designed to address these further actions requested by Council described in para 4.3.35 above.

General findings

4.3.3.8 TAB found that the GCC’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023, supplemented by material changes submitted for TAB’s assessment in April 2024, were largely consistent with the contents of the EUC as TAB applied them in its assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026 that are within the programme-specific eligibility parameters noted in section 4.3.3.14 below. This assessment was made on the basis of draft programme revisions shared in writing and discussed with TAB, which have been approved on a preliminary basis by GCC but are not yet available for use in an updated publicly available format of the programme procedures.

4.3.3.9 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB’s interpretation that “conservative” means that procedures should provide for baselines that are set “in a conservative way *and below the business-as-usual emissions projections*”, following from TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB’s January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.3.15 below.

4.3.3.10 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria Carbon offset credits must be quantified, monitored, reported, and verified; Realistic and credible baselines; Additionality and Leakage. For activities involving grid-connected renewable energy generation/supply, this finding is discussed in section 4.4.4 further down and informed the *Programme-specific eligibility parameters* set out in section 4.3.3.14 below.

4.3.3.11 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Leakage. For activities that involve replacing equipment or other physical systems, this criterion addresses emissions from the replaced equipment, *e.g.*, from its disposal/decommissioning, continued use, *etc.* This finding informed the *Further actions requested of the programme* set out in section 4.3.3.15 below.

4.3.3.12 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Only counted once toward a mitigation obligation. This finding is discussed in section 4.4.6 further down and informed the *Further actions requested* in section 4.3.3.15 below.

4.3.3.13 TAB found that the programme is among those that have in place, or are developing, methodologies that cover novel carbon dioxide removal (CDR) activity types. TAB recommends the exclusions of a few such activity types, pending more detailed consideration of these approaches during TAB’s 2025 assessment cycle. This finding is discussed in section 4.4.2 further down and informed the *Programme-specific eligibility parameters* in section 4.3.3.14 below.

Programme-specific eligibility parameters

4.3.3.14 GCC submitted for TAB's assessment most, but not all, activity types and scales, unit types, methodologies, and procedural categories supported by the programme. TAB recommends the following exclusions and/or limitations to the programme's scope of eligibility: (1) the general eligibility parameters in Section 4.1.1; (2) GCC's existing programme-specific eligibility parameters for the pilot phase set out in Part I of the ICAO document titled "CORSIA Eligible Emissions Units"; (3) the following additional exclusions applicable for the first phase (2024-2026 compliance period):

- b) Approved Carbon Credits (ACCs) issued in respect of emissions reductions that have not been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming¹⁰
- c) ACCs issued to activities involving grid-connected renewable electricity generation/supply that are estimated¹⁶ to have a maximum output capacity greater than 15 megawatt of electricity, individually or grouped,

Further actions requested of the programme

4.3.3.15 TAB also recommends that Council re-iterate the *Further actions requested* in November 2023 (see section 4.3.3.6 above), with the addition of items (d) to (k) below, which do not need to be taken prior to updating the GCC's description in the ICAO document titled "CORSIA Eligible Emissions Units":

- d) Prior to accepting the *Terms of Eligibility for Inclusion in the ICAO document titled "CORSIA Eligible Emissions Units"*, establish procedures to ensure that, for any emissions unit within GCC's *Scope of Eligibility* set out in the ICAO document titled "CORSIA Eligible Emissions Units", upon request of the CORSIA participant account holder or participant's designee, GCC will effect the cancellation of emissions units for the purpose of meeting offsetting requirements under the CORSIA, even if the requested unit has been 'blocked' pending investigation pursuant to GCC's *Standard on Avoidance of Double Claiming of Mitigation Outcomes in Host Country NDCs*.
- e) Upon accepting the *Terms of Eligibility for Inclusion in the ICAO document titled "CORSIA Eligible Emissions Units"*, formalize and make publicly available for use the *Standard on Avoidance of Double Claiming of Mitigation Outcomes in Host Country NDCs* that GCC shared with TAB in draft form,
- f) Introduce procedures for the establishment of standardized baselines, addressing their development, submission, consideration, and quality assurance and data management, including by the programme, where methodologies permit the use of standardized baselines that are not CDM-approved,
- g) Update programme-level requirements and procedures relating to Leakage, including to ensure that, where an activity involves replacing equipment or other physical systems such that these comprise the activity's baseline, the baseline equipment is demonstrably decommissioned, destroyed, or scrapped, or otherwise demonstrated to no longer be in use, and emissions from its disposal are discretely assessed, mitigated where possible, and deducted from the verified results of the activity; or where procedures enable the baseline equipment to potentially be re-sold or otherwise remain in

¹⁶ According to estimates specified at the time of activity registration.

use (including beyond the project boundary), equivalent procedures for assessment, mitigation, and accounting deductions should also apply to emissions resulting from its continued use.

- h) Update GCC labelling practices to ensure that, for any activity or unit that has not obtained a host-country letter of attestation, (1) the CORSIA (C+) and corresponding adjustment (CA+) labels are not used in any form, and (2) that any designation of any ‘forecasted’ or ‘intended’ CORSIA eligibility does not use the “C+” label and clearly and transparently discloses the further condition(s) that must be satisfied for the registry to designate these as fully CORSIA-eligible, and does so fully, prominently, and within visible proximity of the emissions units’ registry listing.
- i) Ensure that all references to the Article 6.2 Guidance would also cover related decisions adopted at UNFCCC COP27 and any relevant future decisions;
- j) Clarify the minimum specifications for the information to be provided in the host country letter of attestation, in order to specifically address the provisions of the Article 6.2 Guidance relating to a Party’s specified ‘trigger’ for first-transfers and the registry that the Party has, or to which it has access;
- k) Establish procedures for GCC to report instances of double-claiming to ICAO and the UNFCCC, as applicable.

4.3.4 **Gold Standard (GS)**

4.3.4.1 TAB recommends that Gold Standard should be approved as immediately eligible to supply CORSIA eligibility emissions units for the first phase (2024-2026 compliance period). The eligibility of the emissions units should be subject to the general eligibility parameters set out in section 4.1.1 above and the programme-specific parameters set out for the programme in paragraph 4.3.4.15 of this report, which should be clearly described in section II of the ICAO document titled “CORSIA Eligible Emissions Units”.

Background on programme status

4.3.4.2 Gold Standard first applied for assessment by the TAB in July 2019. In March 2020, the Council accepted TAB’s recommendation that the Gold Standard should be eligible for pilot phase (2021-2023 compliance period).

4.3.4.3 Gold Standard applied for re-assessment by the TAB in March 2022. Council approved TAB’s recommendation that Gold Standard be conditionally eligible for the first phase (2024-2026 compliance period) in March 2023, pending Gold Standard’s implementation of further actions requested by the Council.

4.3.4.4 In August 2023, Gold Standard submitted procedural updates for TAB material change assessment. In its January 2024 Report to Council, TAB found that Gold Standard demonstrated technical consistency with some, but not all, contents of the following criteria: Identification and tracking; Carbon offset credits must be based on a realistic and credible baseline; Permanence; and Only counted once towards a mitigation obligation. GS’s progress toward fully meeting these criteria informed the *Further actions requested of the programme* recommended in section 4.2.4.14 of January 2024 TAB Report to Council.

4.3.4.5 In March 2024, the Council re-iterated its decision that Gold Standard should be conditionally eligible for the first phase and updated the list of *Further actions requested of the programme*, as recommended by TAB (see section 4.3.4.4 above). Gold Standard was requested to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB's review and recommendation and Council's consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- a) Complete the process for ISO/IEC 27001 certification for the Gold Standard registry information security management system, or equivalent security enhancements, including procedures for periodic audits;
- b) Clarify in Gold Standard reversal compensation procedures that the programme will ensure that reversals of mitigation issued as CORSIA-eligible emissions units will only be replaced/compensated by emissions units that are also fully eligible for the same CORSIA compliance period;
- c) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant Guidelines, mindful of TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement contained in the document *Clarifications of TAB's Criteria interpretations*. Further actions should address the following:
 - i. Procedures for *the programme* to ensure that the information on host country attestations made public by programme is compared with the information on authorizations in national reports;
 - ii. Procedures for *the programme* 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;
 - iii. Procedures for *the programme* to verify that the information on host country attestations and reporting is obtained and submitted by project owners, and is accurate and timely; and that the programme will respond to instances of non-responsiveness / inaction / inaccuracies in reports submitted by a project owner in regard to these information requirements;
 - iv. Review and update GS's procedures for obtaining evidence of the application of adjustments, in order to ensure that the timing and information sought in different national reports (e.g., Biennial Transparency Reports, Agreed Electronic Format) is consistent their respective contents per the Article 6.2 Guidance, so that Gold Standard and project developers have the correct instructions needed to meet their responsibilities under the GS's procedures for comparing unit use against national reporting;
 - v. Procedures for *the programme* to ensure that the programme, or proponents of the activities it supports, fully 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; and
 - vi. Provide evidence of the basis by which a Project owner legally commits to replace double-claimed mitigation in line with Gold Standard's requirements, e.g., contract template excerpt.

4.3.4.6 Also in March 2024, Council requested Gold Standard to undertake the following further actions, which would not need to be taken prior to adding Gold Standard to section II of the ICAO document titled “CORSlA Eligible Emissions Units:

- a) At the earliest opportunity, to update, or finalize updates to, the programme registry to enhance consistency with all requirements in the Emissions Unit Programme Registry Attestation, Part B, Paragraph 7.10, including for the registry to record cancellation information required in the CORSlA SARPs Appendix 5, Table A5-717, through discrete, standardized fields in a downloadable format;
- b) Update the programme registry functionality to transparently identify the relevant CORSlA compliance period(s) for which units are CORSlA-eligible; and,
- c) At the earliest opportunity, but no later than TAB’s re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

Summary of material procedural updates

4.3.4.7 In April 2024, the Gold Standard submitted updates (as “material changes”) to programme procedures designed to address the further actions requested by Council described in para 4.3.4.5 above.

General findings

4.3.4.8 TAB found that the Gold Standard’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023, supplemented by material changes submitted for TAB’s assessment in April 2024, were largely consistent with the contents of the EUC as TAB applied them in its assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026 that are within the programme-specific eligibility parameters noted in section 4.3.4.15 below. This assessment was made on the basis of draft programme revisions shared in writing and discussed with TAB, which have been approved on a preliminary basis by Gold Standard but are not yet available for use in an updated publicly available format of the programme procedures.

4.3.4.9 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB’s interpretation that “conservative” means that procedures should provide for baselines that are set “in a conservative way and *below the business-as-usual emissions projections*”, following from TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB’s January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.4.17 below.

4.3.4.10 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Permanence. This finding is discussed in section 4.4.5 further down and informed the *Further action requested* set out in section 4.3.4.17 below.

4.3.4.11 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Leakage. For activities that involve replacing equipment or other physical systems,

this criterion addresses emissions from the replaced equipment, *e.g.*, from its disposal/decommissioning, continued use, *etc.* This finding informed the *Further actions requested* of the programme set out in section 4.3.4.17 below.

4.3.4.12 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Only counted once toward a mitigation obligation. This finding is discussed in section 4.4.6 further down and informed the Programme-specific eligibility parameters set out in section 4.3.4.15 below.

4.3.4.13 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria Carbon offset credits must be quantified, monitored, reported, and verified; Realistic and credible baselines; Additionality and Leakage. For activities involving grid-connected renewable energy generation/supply, this finding is discussed in section 4.4.4 further down and informed the *Programme-specific eligibility parameters* set out in section 4.3.4.15 below.

4.3.4.14 TAB found that the programme is among those that have in place, or are developing, methodologies that cover novel carbon dioxide removal (CDR) activity types. TAB recommends the exclusions of a few such activity types, pending more detailed consideration of these approaches during TAB's 2025 assessment cycle. This finding is discussed in section 4.4.2 further down and informed the Programme-specific eligibility parameters in section 4.3.4.15 below.

Programme-specific eligibility parameters

4.3.4.15 Gold Standard submitted for TAB's assessment most, but not all, activity types and scales, unit types, methodologies, and procedural categories supported by the programme. TAB recommends the following exclusions and/or limitations to the programme's scope of eligibility: (1) the general eligibility parameters in Section 4.1.1, and (2) Gold Standard's existing programme-specific eligibility parameters for the pilot phase set out in Part I of ICAO document titled "CORSIA Eligible Emissions Units", as amended below for the first phase (2024-2026 compliance period):

Scope of Eligibility:

The Gold Standard verified emissions reductions (VERs), including any additional certifications, that:

have been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming, and,

for which the programme has verified, in accordance with its procedures, that the corresponding adjustment has already been applied, and/or that are the subject of a Guarantee approved by the programme that covers all units to which the host country Letter of Authorization applies and have Eligible Unit Dates within the relevant CORSIA compliance period,

and with the exclusion of the following activity and/or unit types, methodologies, programme elements, and/or procedural classes:

- a) Planned Emission Reductions (PERs)

- b) Units issued from micro scale activities where an accredited entity has not carried out validation and verification
- c) VERs issued to all activities that are developed in REDD+ countries⁵ and utilize methodologies in the programme’s Land Use and Forestry & Agriculture categories and are estimated⁶ to generate greater than 7,000 Verified Emissions Reductions (VERs) / annum individually or grouped, with the allowable exception of activities that utilize methodologies in the Soil Organic Carbon, Agriculture, and Livestock categories.
- d) VERs issued to activities involving grid-connected renewable electricity generation/supply that are estimated¹⁷ to have a maximum output capacity greater than 15 megawatt of electricity, individually or grouped
- e) VERs issued to all activities that utilize methodologies in the programme’s Engineered Removals category.

4.3.4.16 TAB also recommends making consequential amendments to the Part I of the ICAO document “CORSIA Eligible Emissions Units”, in order to extend the programme’s *Eligible Unit Dates* for the CORSIA pilot phase (2021-2023 compliance period) through 31 December 2023, subject to the following exclusions:

- d) VERs issued in respect of emissions reductions that occurred from 1 January 2021 onward and that have not been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming¹⁰
- e) VERs issued in respect of emissions reductions that occurred from 1 January 2021 onward that have been authorized by the host country for use in CORSIA, for which, either:
 - i) the programme has not verified, in accordance with its procedures that the corresponding adjustment has already been applied, or,
 - ii) the VERs are not subject of a Guarantee approved by the programme that covers all units to which the host country Letter of Authorization applies and have Eligible Unit Dates within the relevant CORSIA compliance period,

Further actions requested of the programme

4.3.4.17 TAB also recommends that Council re-iterate the *Further actions requested* in January 2023 (see section 4.3.4.6 above), with the addition of items (d) to (g) below, which do not need to be taken prior to updating the Gold Standard’s description in the ICAO document titled “CORSIA Eligible Emissions Units”:

- d) Upon accepting the *Terms of Eligibility for Inclusion in the ICAO document titled “CORSIA Eligible Emissions Units,”* formalize and make publicly available for use Gold Standard’s ‘GHG

¹⁷ According to estimates specified at the time of activity registration.

Emission Reduction and Sequestration Product Requirements' and Annexes that were shared with TAB in August 2024,

- e) Update programme-level requirements and procedures relating to Leakage, including to ensure that, where an activity involves replacing equipment or other physical systems such that these comprise the activity's baseline, the baseline equipment is demonstrably decommissioned, destroyed, or scrapped, or otherwise demonstrated to no longer be in use, and emissions from its disposal are discretely assessed, mitigated where possible, and deducted from the verified results of the activity; or where procedures enable the baseline equipment to potentially be re-sold or otherwise remain in use (including beyond the project boundary), equivalent procedures for assessment, mitigation, and accounting deductions should also apply to emissions resulting from its continued use.
- f) Establish a reversal risk buffer pool that is shared across all Gold Standard projects involving GHG removals with material risks of reversal.
- g) Update the programme's procedures to ensure that a CORSIA eligibility label for the 2024-2026 compliance period is applied to all units issued by Gold Standard within the Scope of Eligibility set out in Section II of the ICAO document titled "CORSIA Eligible Emissions Units."

4.3.5 **Verified Carbon Standard (VCS)**

4.3.5.1 TAB recommends that VCS should now be approved as immediately eligible to supply CORSIA eligibility emissions units for the first phase (2024-2026 compliance period). The eligibility of the emissions units should be subject to the general eligibility parameters set out in section 4.1.1 above and the programme-specific parameters set out for the programme in paragraph 4.3.5.15 of this report, which should be clearly described in section II of the ICAO document titled "CORSIA Eligible Emissions Units".

Background on programme status

4.3.5.2 VCS first applied for assessment by the TAB in July 2019. In March 2020, the Council accepted TAB's recommendation that the VCS should be eligible for pilot phase (2021-2023 compliance period).

4.3.5.3 VCS applied for re-assessment by the TAB in March 2022. Council approved TAB's recommendation that VCS be conditionally eligible for the first phase (2024-2026 compliance period) in March 2023, pending VCS's implementation of further actions requested by the Council.

4.3.5.4 In August 2023, VCS submitted procedural updates for TAB's material change assessment. TAB found that VCS demonstrated technical consistency with some, but not all, contents of the following criteria: Identification and tracking; Quantified, monitored, reported and verified; Additionality; Carbon offset credits must be based on a realistic and credible baseline, Assess and mitigate against potential increase in emissions elsewhere and Only counted once towards a mitigation obligation. These findings informed the updated list of *Further actions requested of the programme* recommended in section 4.2.5.14 of January 2024 TAB Report to Council.

4.3.5.5 In March 2024, the Council reaffirmed its decision that VCS should be conditionally eligible for the first phase and updated the list of *Further actions requested of the programme* (see section 4.3.5.4 above). Council requested VCS to take the following actions to satisfy its eligibility conditions, and to

provide evidence of such for TAB’s review and recommendation and Council’s consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- a) Include in VCS programme documents procedures that VCUs shall not be eligible for the CORSIA first phase (2024-2026 compliance period) if issued to an activity that applies methodologies or methodological standards which allow any exemptions to legal additional requirements, such as in situations where legally binding mandates are systematically not enforced and/or non-compliance is widespread,
- b) Provide evidence to TAB that VCS clearly prohibits Project developers and other market actors with access to its registry from double-selling;
- c) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant Guidelines, mindful of TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement contained in the document *Clarifications of TAB’s Criteria interpretations*. Further actions should address the following:
 - i. Complete the planned updates to the VCS CORSIA Label Guidance and submit to TAB as a material change for its assessment;
 - ii. Update the functionality of the VCS registry to ensure that, for any unit with the label “Article 6 Authorized – International mitigation purposes”, the registry clearly and transparently shows whether or not that unit is within VCS’s Scope of Eligibility in the document titled “CORSIA Eligible Emissions Units”.
 - iii. Establish procedures for the programme to respond to changes to the number, scale, and/or scope of host country attestations;
 - iv. Put in place procedures for the program, 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, such that double claiming does not occur between the airline and the host country of the emissions reduction activity.

4.3.5.6 Also in March 2024, Council requested VCS to undertake these further actions, which did not need to be taken prior to adding VCS to section II of the ICAO document titled “CORSIA Eligible Emissions Units”:

- a) At the earliest opportunity, update, or finalize updates to, the programme registry to enhance consistency with all requirements in the Emissions Unit Programme Registry Attestation, Part B, Paragraph 7.10, including for the registry to record cancellation information required in the CORSIA SARPs Appendix 5, Table A5-7¹⁸, through discrete, standardized fields in a downloadable format; and,
- b) Update the programme registry functionality to transparently identify the relevant CORSIA compliance period(s) for which units are CORSIA-eligible.

Summary of material procedural updates

4.3.5.7 In April 2024, the VCS submitted updates (as “material changes”) to programme procedures designed to address the Further actions requested by Council described in para 4.3.5.5 above.

¹⁸ Required fields for reporting emissions unit cancellations: Aeroplane operator in whose name the unit was cancelled {name}; Compliance period {for which units were cancelled}; Quantity of units cancelled {in a given batch}; Start of serial number range {by batch}; End of serial number range {by batch}; Date of cancellation; Name of programme; Unit type {e.g., VER, CRT}; Host country; Methodology {alpha/numeric identifier}; Unit vintage {year}.

General findings

4.3.5.8 TAB found that the VCS procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023, supplemented by material changes submitted for TAB's assessment in April 2024, were largely consistent with the contents of the EUC as TAB applied them in its assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026 that are within the programme-specific eligibility parameters noted in section 4.3.5.15 below. This assessment was made on the basis of draft programme revisions shared in writing and discussed with TAB, which have been approved on a preliminary basis by VCS but are not yet available for use in an updated publicly available format of the programme procedures.

4.3.5.9 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way *and below the business-as-usual emissions projections*", following from TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB's January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.5.17 below.

4.3.5.10 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria Carbon offset credits must be quantified, monitored, reported, and verified; Realistic and credible baselines; Additionality and Leakage. For activities involving grid-connected renewable energy generation/supply, this finding is discussed in section 4.4.4 further down and informed the *Programme-specific eligibility parameters* set out in section 4.3.5.15 below.

4.3.5.11 TAB again found that the VCS demonstrated technical consistency with some, but not all, contents of the criterion Assess and mitigate against potential increase in emissions elsewhere. Related to *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 sub-national level*, Scenario 1 and 2b of VCS Jurisdictional and Nested REDD+ (JNR) requirements allows REDD+ projects to "nest" into a jurisdictional baseline without jurisdiction-level monitoring and accounting. This is inconsistent with TAB's interpretation of this criterion. TAB re-affirmed the relevance of the exclusions and allowable exceptions on this matter contained in the ICAO document "CORISIA Eligible Emissions Units" and did not recommend to broaden this list. All three of the new methodologies submitted by VCS could be used to quantify emissions units from REDD+-relevant activity types in host countries pursuing elements of REDD+.

4.3.5.12 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Leakage. For activities that involve replacing equipment or other physical systems, this criterion addresses emissions from the replaced equipment, *e.g.*, from its disposal/decommissioning, continued use, *etc.* This finding informed the *Further actions requested* of the programme set out in section 4.3.5.17 below.

4.3.5.13 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Only counted once toward a mitigation obligation. This finding is discussed in section 4.4.6 further down and informed the *Programme-specific eligibility parameters* set out in section 4.3.5.17 below.

4.3.5.14 TAB found that the programme is among those that have in place, or are developing, methodologies that cover novel carbon dioxide removal (CDR) activity types. TAB recommends the

exclusions of a few such activity types, pending more detailed consideration of these approaches during TAB's 2025 assessment cycle. This finding is discussed in section 4.4.2 further down and informed the Programme-specific eligibility parameters in section 4.3.5.15 below.

Programme-specific eligibility parameters

4.3.5.15 VCS submitted for TAB's assessment most, but not all, activity types and scales, unit types, methodologies, and procedural categories supported by the programme. TAB recommends the following exclusions and/or limitations to the programme's scope of eligibility: (1) the general eligibility parameters in Section 4.1.1, (2) VCS's existing programme-specific eligibility parameters for the pilot phase set out in Part I of ICAO document titled "CORSIA Eligible Emissions Units"; (3) the following amendments applicable for the first phase (2024-2026 compliance period):

Scope of Eligibility:

Verified Carbon Units (VCUs), including any additional certifications, that:

have been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming, and,

for which the programme has verified in, accordance with its procedures, that the corresponding adjustment has already been applied, and/or that are subject of a Guarantee approved by the programme that covers all units to which the host country Letter of Authorization applies and have Eligible Unit Dates within the relevant CORSIA compliance period,

and with the exclusion of the following activity and/or unit types, methodologies, programme elements, and/or procedural classes:

- a) California Early Action Offset Credits (EAOCs)
- b) California Registry Offset Credits (ROCs)
- c) VCUs issued to activities that have not reported their sustainable development contributions or co-benefits in the course of applying the Climate, Community and Biodiversity (CCB) Standards or the Sustainable Development Verified Impact Standard (SD VISTa Standard), or according to other default list(s) of sustainable development criteria that the VCS clearly identifies for such use;
- d) VCUs issued to activities involving grid-connected renewable electricity generation/supply that are estimated to have a maximum output capacity greater than 15 megawatt of electricity, individually or grouped
- e) VCUs that utilize methodologies AMS-II.G and/or VMR0006
- f) VCUs issued to activities that utilize methodologies from within the programme's Sectoral Scope 16

- g) VCUs issued to project-level activities, including projects following the VCS Jurisdictional and Nested REDD+ (JNR) framework, that are developed in REDD+ countries⁵ and utilize methodologies within the programme’s Sectoral Scope 14 and are estimated⁶ to generate greater than 7,000 Verified Carbon Units (VCUs) / annum individually or grouped **with these allowable exceptions:**
 - a. VCUs issued to project-level activities under a jurisdictional programme following Scenario 2a of the VCS JNR framework
 - b. VCUs issued under a jurisdictional programme following Scenario 3 of the VCS JNR framework
 - c. VCUs issued to project-level activities that utilize one of the following methodologies: VM0012, VM0017, VM0021, VM0022, VM0024, VM0026 (and VMD0040), VM0032, VM0033, VM0036, VM0041, VM0042.

4.3.5.16 TAB also recommends making consequential amendments to the Part I of the ICAO document “CORSIA Eligible Emissions Units”, in order to extend the programme’s *Eligible Unit Dates* for the CORSIA pilot phase (2021-2023 compliance period) through 31 December 2023, subject to the following exclusions:

- e) VCUs issued in respect of emissions reductions that occurred from 1 January 2021 onward and that have not been authorized by the host country for use in CORSIA by way of an attestation to the avoidance of double-claiming¹⁰
- f) VCUs issued in respect of emissions reductions that occurred from 1 January 2021 onward that have been authorized by the host country for use in CORSIA, for which, either:
 - i) the programme has not verified, in accordance with its procedures that the corresponding adjustment has already been applied, or,
 - ii) the VCUs are not subject of a Guarantee approved by the programme that covers all units to which the host country Letter of Authorization applies and have Eligible Unit Dates within the relevant CORSIA compliance period,

Further actions requested of the programme

4.3.5.17 TAB also recommends that Council re-iterate item (a) in the *Further actions requested* in January 2023 (see section 4.3.5.6 above), with the addition of items (b) to (e) below, which do not need to be taken prior to updating the VCS’s description in the ICAO document titled “CORSIA Eligible Emissions Units”:

- (b) Upon accepting the *Terms of Eligibility for Inclusion in the ICAO document titled “CORSIA Eligible Emissions Units,”* formalize and publish the draft CORSIA label guidance that was shared with TAB in August 2024,

- (c) Update programme-level requirements and procedures relating to Leakage, including to ensure that, where an activity involves replacing equipment or other physical systems such that these comprise the activity’s baseline, the baseline equipment is demonstrably decommissioned, destroyed, or scrapped, or otherwise demonstrated to no longer be in use, and emissions from its disposal are discretely assessed, mitigated where possible, and deducted from the verified results of the activity; or where procedures enable the baseline equipment to potentially be re-sold or otherwise remain in use (including beyond the project boundary), equivalent procedures for assessment, mitigation, and accounting deductions should also apply to emissions resulting from its continued use.
- (d) Update procedures for reporting instances of program responses to country-level double-claiming, including any instance where VCS withdraws an ‘Article 6 - International mitigation purposes’ label.
- (e) Update the programme’s procedures to ensure that a CORSIA eligibility label for the 2024-2026 compliance period is applied to all units issued by VCS within the Scope of Eligibility set out in Section II of the ICAO document titled “CORSIA Eligible Emissions Units”

4.3.6 **Programmes recommended for conditional eligibility**

4.3.6.1 TAB recommends that the Council’s designation of the following emissions unit programmes should be approved as conditionally eligible for the first phase (2024-2026 compliance cycle), pending the completion of further actions set out in this section:

- BioCarbon Fund Initiative for Sustainable Forest Landscapes (ISFL) (see details in section 4.3.7)
- Cercarbono (see details in section 4.3.8)
- Forest Carbon Partnership Facility (FCPF) (see details in section 4.3.9)
- Isometric (see details in section 4.3.10)
- Premium Thailand Voluntary Emission Reduction Program (T-VER) (see details in section 4.3.11)

4.3.6.2 For clarity, TAB is not recommending that these programmes be approved to supply CORSIA Eligible Emissions Units at this stage (*i.e.*, immediately added to section II of the ICAO document “CORSIA Eligible Emissions Units”). Rather, TAB will confirm to Council when programme updates meet specified conditions; *then* the programme will be added to the ICAO document “CORSIA Eligible Emissions Units” for the first phase (2024-2026 compliance cycle).

4.3.7 **BioCarbon Fund Initiative for Sustainable Forest Landscapes (ISFL)**

4.3.7.1 In light of the ISFL’s procedural updates submitted in April 2024 for assessment in TAB’s 2024 material change assessment cycle (MCA/2024), TAB recommends that the Council updates the *Further actions requested* of the programme, in light of progress that the programme has made in implementing the previously requested actions (Section 4.3.7.10 below).

Background on programme status

4.3.7.2 BioCarbon Fund for Sustainable Forest Landscapes first applied for assessment by the TAB in 2020. Following successive assessments by TAB, in November 2023, the Council approved TAB’s recommendation that ISFL should be *immediately* eligible for pilot phase (2021-2023 compliance period), as well as *conditionally* eligible for the first phase (2024-2026 compliance period), pending the programme’s implementation of further actions requested by the Council.

4.3.7.3 As further explained in its September 2023 Report to Council,¹⁹ TAB found that ISFL demonstrated technical consistency with some, but not all, contents of the criterion Identification and tracking; Offset credit issuance and retirement procedures; Carbon offset credits must be based on a realistic and credible baseline, and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.3.3.5 of the September 2023 TAB report.

4.3.7.4 In November 2023, upon approving ISFL as conditionally eligible for the first phase, Council requested the programme to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB’s review and recommendation and Council’s consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- a) Update the public-facing view of the CATS registry to ensure that, for any jurisdictional programme that generates CORSIA-eligible units, the serial numbers for each batch of units that has been issued (including tradeable units that have not yet been cancelled) are displayed, and ensure that all programme documentation related to these units is easily accessible, including the relevant monitoring and verification reports,
- b) Update the ISFL procedures and the CATS registry system to clarify when and where the host country letters of attestation will be made publicly available,
- c) Establish procedures to address changes to the number, scale, and/or scope of host country attestations;
- d) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant guidelines, mindful of TAB’s considerations and analysis contained in the document *Clarifications of TAB’s Criteria interpretations*.
- e) Put procedures in place for ISFL to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme’s coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon.

4.3.7.5 Also in November 2023, Council requested ISFL undertake the following further actions, which would not need to be taken prior to adding ISFL to section II of the ICAO document titled “CORSIA Eligible Emissions Units”:

- a) Ensure that the periodicity of security audits is clearly defined well before the CATS registry contains CORSIA-eligible units.
- b) Specify in ISFL programme documents that the maximum length of an ERPA phase is five years.
- c) At the earliest opportunity, but no later than TAB’s re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

Summary of material procedural updates

¹⁹ Appendix B of C.230 WP-15523

4.3.7.6 In April 2024, ISFL submitted updates (as “material changes”) to programme procedures designed to address the further actions requested by Council described in para 4.3.7.4 above.

General findings

4.3.7.7 TAB found that ISFL’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023, supplemented by material changes submitted for TAB’s assessment in April 2024, were largely consistent with the contents of the EUC as TAB applied them in its eligibility re-assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026, pending its completion of the updated *Further actions requested* of the programme recommended in section 4.3.7.10 further down.

4.3.7.8 TAB found that ISFL demonstrated technical consistency with some, but not all, contents of the criterion Identification and Tracking and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested* of the programme recommended in section 4.3.7.10 further down.

4.3.7.9 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB’s interpretation that “conservative” means that procedures should provide for baselines that are set “in a conservative way *and below the business-as-usual emissions projections*”, following from TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB’s January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.7.11 below.

Further actions requested of the programme

4.3.7.10 TAB recommends that Council request ISFL to undertake the further actions in paragraphs (a) to (b) below, which ISFL is invited to submit for TAB to assess and make recommendations to the Council as necessary to finalize the conditional eligibility for the first phase of units issued under these programme elements. These requested further actions supersede the further actions requested by Council in September 2023 (see section 4.3.7.4 above):

- (a) Update the public-facing view of the CATS registry to ensure that, for any jurisdictional programme that generates CORSIA-eligible units, ensure that unit status and all programme documentation related to these units is easily accessible via their specific registry entries, including the relevant monitoring and verification reports corresponding to each batch of units;
- (b) Develop and put into place a complete suite of procedures necessary to ensure that the program, or proponents of the activities it supports, fully 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, mindful of TAB’s considerations contained in the document *Clarifications of TAB’s Criteria interpretations* and in section 4.4 of this report.

4.3.7.11 TAB also recommended that Council reiterate the list of *Further actions* referred in section 4.3.7.5 above, with the addition of item (d) below, which does not need to be taken prior to adding ISFL to section II of the ICAO document titled “CORSIA Eligible Emissions Units”:

- d) Complete planned updates to the CATS registry to ensure that it has the capability to fully implement recent changes to the ISFL procedures and CATS Operational Guidelines.

4.3.8 Cercarbono

4.3.8.1 In light of the Cercarbono's procedural updates submitted in April 2024 for assessment in TAB's 2024 material change assessment cycle (MCA/2024), TAB recommends that the Council updates the *Further actions requested of the programme*, in light of progress that the programme has made in implementing the previously requested actions (Section 4.3.8.12 below).

Background on programme status

4.3.8.2 Cercarbono first applied for assessment by the TAB in 2020. In September 2023, the Council accepted TAB's recommendation that the programme be conditionally eligible for the first phase (2024-2026 compliance period), pending programme's implementation of further actions requested by the Council.

4.3.8.3 As further explained in its September 2023 Report to Council,²⁰ TAB found that Cercarbono demonstrated technical consistency with some, but not all, contents of the criterion Program governance; Additionality; Avoidance of double counting, issuance and claiming; and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.3.4.5 of the September 2023 TAB report.

4.3.8.4 In November 2023, upon approving Cercarbono as conditionally eligible for the first phase, Council requested the programme to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB's review and recommendation and Council's consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- a) Put in place a complete plan for the long-term administration of multi-decadal programme elements, in particular for emissions units issued, held, and/or cancelled/retired on the registry and associated documentation of the activities and ownership, which includes possible responses to the dissolution of the programme in its current form;
- b) Clearly state in the Cercarbono standard and procedures that the programme's legal additionality requirements supersede any exemptions contained in methodologies or methodological standards in use by Cercarbono, such as for situations where legally binding mandates are systematically not enforced and/or non-compliance is widespread;
- c) Put procedures in place for Cercarbono to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon.
- d) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant

²⁰ Appendix B of C.230 WP-15523

guidelines, mindful of TAB's considerations and analysis contained in the document *Clarifications of TAB's Criteria interpretations*.²¹

4.3.8.5 Also in November 2023, Council requested Cercarbono to undertake these further actions, which did not need to be taken prior to adding Cercarbono to section II of the ICAO document titled "CORSIA Eligible Emissions Units":

- a) At the earliest opportunity, but no later than TAB's re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes

Summary of material procedural updates

4.3.8.6 In April 2024, Cercarbono submitted updates (as "material changes") to programme procedures designed to address some of the further actions requested by Council described in para 4.3.8.4 above.

General findings

4.3.8.7 TAB found that Cercarbono's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023, supplemented by material changes submitted for TAB's assessment in April 2024, were largely consistent with the contents of the EUC as TAB applied them in its assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026, pending the completion of the *Further actions requested* of the programme recommended in section 4.3.8.12 further down.

4.3.8.8 TAB again found that Cercarbono demonstrated technical consistency with some, but not all, contents of the criterion Program governance; Avoidance of double counting, issuance and claiming and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested* of the programme recommended in section 4.3.8.12 further down.

4.3.8.9 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that "conservative" means that procedures should provide for baselines that are set "in a conservative way and below the business-as-usual emissions projections", following from TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB's January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.8.13 below.

4.3.8.10 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria Carbon offset credits must be quantified, monitored, reported, and verified; Realistic and credible baselines; Additionality and Leakage. For activities involving grid-connected renewable energy generation/supply, this finding is discussed in section 4.4.4 further down.

4.3.8.11 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Leakage. For activities that involve replacing equipment or other physical systems,

²¹ <https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/Clarifications.pdf>

this criterion addresses emissions from the replaced equipment, *e.g.*, from its disposal/decommissioning, continued use, *etc.* This finding informed the *Further actions requested* of the programme set out in section 4.3.8.12 below.

Further actions requested of the programme

4.3.8.12 TAB recommends that Council request Cercarbono to undertake the further actions in paragraphs a) to b) below, which Cercarbono is invited to submit for TAB to assess and make recommendations to the Council as necessary to finalize the conditional eligibility for the first phase of units issued under these programme elements. These requested further actions supersede the further actions requested by Council in September 2023 (see section 4.3.8.4 above):

- a) Further develop Cercarbono’s plan for the long-term administration of multi-decadal programme elements,
- b) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant guidelines, mindful of TAB’s considerations and analysis contained in the document *Clarifications of TAB’s Criteria interpretations* and in this report.

4.3.8.13 TAB also recommend that Council re-iterate the *Further action requested* in section 4.3.8.5 above, with the addition of item (b) below, which does not need to be taken prior to adding Cercarbono to section II of the ICAO document titled “CORISIA Eligible Emissions Units”:

- b) Update programme-level requirements and procedures relating to Leakage, including to ensure that, where an activity involves replacing equipment or other physical systems such that these comprise the activity’s baseline, the baseline equipment is demonstrably decommissioned, destroyed, or scrapped, or otherwise demonstrated to no longer be in use, and emissions from its disposal are discretely assessed, mitigated where possible, and deducted from the verified results of the activity; or where procedures enable the baseline equipment to potentially be re-sold or otherwise remain in use (including beyond the project boundary), equivalent procedures for assessment, mitigation, and accounting deductions should also apply to emissions resulting from its continued use.

4.3.9 Forest Carbon Partnership Facility (FCPF)

4.3.9.1 In light of the FCPF’s procedural updates submitted in April 2024 for assessment in TAB’s 2024 material change assessment cycle (MCA/2024), TAB recommends that the Council updates the *Further actions requested of the programme*, in light of progress that the programme has made in implementing the previously requested actions (Section 4.3.9.10 below).

Background on programme status

4.3.9.2 FCPF applied for assessment by the TAB in March 2023 seeking eligibility for CORSIA first phase. Council approved TAB’s recommendation that the programme be conditionally eligible for the first phase (2024-2026 compliance period) in November 2023, pending programme’s implementation of further actions requested by the Council.

4.3.9.3 As further explained in its September 2023 Report to Council,²² TAB found that the FCPF demonstrated technical consistency with some, but not all, contents of the following criteria: Identification and tracking; Offset credit issuance and retirement procedures; Carbon offset credits must be based on a realistic and credible baseline and Only counted once towards a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.3.5.5 of its September 2023 Report.

4.3.9.4 In November 2023, upon approving FCPF as conditionally eligible for the first phase, Council requested the programme to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB's review and recommendation and Council's consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- a) Update the public-facing view of the CATS registry to ensure that, for any jurisdictional programme that generates CORSIA-eligible units, the serial numbers for each batch of units that has been issued (including tradeable units that have not yet been cancelled) are displayed, and ensure that all programme documentation related to these units is easily accessible, including the relevant monitoring and verification reports,
- b) Update the FCPF procedures and the CATS registry system to clarify when and where the host country letters of attestation will be made publicly available,
- c) Establish procedures to address changes to the number, scale, and/or scope of host country attestations;
- d) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant guidelines, mindful of TAB's considerations and analysis contained in the document *Clarifications of TAB's Criteria interpretations*.²³
- e) Put procedures in place for FCPF to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon

4.3.9.5 Also in November 2023, Council requested FCPF to undertake these further actions, which did not need to be taken prior to adding FCPF to section II of the ICAO document titled "CORSIA Eligible Emissions Units":

- a) Ensure that the periodicity of security audits is clearly defined well before the CATS registry contains CORSIA-eligible units,
- b) At the earliest opportunity, but no later than TAB's re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

²² Paragraph 4.2.6.2 of Appendix B, C228.WP15473.

²³ <https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2023/Clarifications.pdf>

Summary of material procedural updates

4.3.9.6 In April 2024, the FCPF submitted updates (as “material changes”) to programme procedures designed to address the further actions requested by Council described in para 4.3.9.4 above.

General findings

4.3.9.7 TAB found that the FCPF’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023, supplemented by material changes submitted for TAB’s assessment in April 2024, were largely consistent with the contents of the EUC as TAB applied them in its eligibility re-assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026, pending its completion of the updated *Further actions requested* of the programme recommended in section 4.3.9.10 further down.

4.3.9.8 TAB found that FCPF demonstrated technical consistency with some, but not all, contents of the criterion Identification and Tracking and Only counted once towards a mitigation obligation. These findings informed the Further actions requested of the programme recommended in section 4.3.9.10 further down.

4.3.9.9 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB’s interpretation that “conservative” means that procedures should provide for baselines that are set “in a conservative way *and below the business-as-usual emissions projections*”, following from TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB’s January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.9.11 below.

Further actions requested of the programme

4.3.9.10 TAB recommends that Council request FCPF to undertake the further actions in paragraphs (a) to (b) below, which FCPF is invited to submit for TAB to assess and make recommendations to the Council as necessary to finalize the conditional eligibility for the first phase of units issued under these programme elements. These requested further actions supersede the further actions requested by Council in September 2023 (see section 4.3.9.4 above):

- (a) Update the public-facing view of the CATS registry to ensure that, for any jurisdictional programme that generates CORSIA-eligible units, ensure that all programme documentation related to these units is easily accessible via their specific registry entries, including the relevant monitoring and verification reports corresponding to each batch of units;
- (b) Develop and put into place a complete suite of procedures necessary to ensure that the program, or proponents of the activities it supports, fully 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, mindful of TAB’s considerations contained in the document *Clarifications of TAB’s Criteria interpretations* and section 4.4.5 of this report.

4.3.9.11 TAB also recommended that Council reiterate the list of *Further actions* referred in section 4.3.9.5 above, with the addition of item (c) below, which does not need to be taken prior to adding FCPF to section II of the ICAO document titled “CORSIA Eligible Emissions Units”:

- c) Complete planned updates to the CATS registry to ensure that it has the capability to fully implement recent changes to the FCPF procedures and CATS Operational Guidelines.

4.3.10 **Isometric**

4.3.10.1 TAB found that Isometric’s procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2024 were largely consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards, pending the completion of the *Further actions requested of the programme* recommended in section 4.3.10.4 further down.

4.3.10.2 TAB found that Isometric demonstrated technical consistency with some, but not all, contents of the criterion Carbon offset credits must be quantified, monitored, reported, and verified, Carbon offset credits must be based on a realistic and credible baseline, Validation and Verification procedures, Offset Credit Issuance and Retirement Procedures, Permanence, Only counted once toward a mitigation obligation. These findings informed the *Further actions requested of the programme* recommended in section 4.3.10.4 further down.

4.3.10.3 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB’s interpretation that “conservative” means that procedures should provide for baselines that are set “in a conservative way and below the business-as-usual emissions projections”, following from TAB’s considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB’s January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.10.4 below.

Further actions requested of the programme

4.3.10.4 TAB recommends that the Council request Isometric to undertake the further actions described in para. (a) to (e) below, which Isometric is invited to submit for TAB to assess and make recommendations to Council as necessary to finalize the conditional eligibility of units issued under these programme elements:

- (a) Clarify in Isometric’s procedures that business confidentiality provisions cannot prevent the disclosure of baselines and underlying assumptions for any CORSIA-eligible activity.
- (b) Update Isometric’s procedures to ensure that the correct terminology (*e.g.*, “must/shall”) is used to describe mandatory requirements across all programme documentation (including on Project Design Documents, monitoring plans, and validation and verification procedures, etc.), in order to address inconsistencies relating to safeguards, sustainable development, reversal risk assessments and carbon leakage, on matters that are required for CORSIA eligibility.
- (c) Update the programmes procedures relating to the criterion Permanence, in particular its guideline, *Risk assessment*, mindful of TAB’s considerations contained in the document *Clarifications of TAB’s Criteria interpretations* and section 4.4.5 of in this report.

- (d) Clearly state in programme documentation that Isometric commits to fully compensate for any reversal of mitigation issued as CORSIA-eligible emissions units, including in the instance that a reversal event exceeds the project proponents' buffer pool contributions,
- (e) Develop and put into place a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant Guidelines, mindful of TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement contained in the document *Clarifications of TAB's Criteria interpretations*. Further actions should address the following:
 - i. Clearly state in Isometric's procedures that all emissions units representing mitigation that occurred from 1 January 2021 onward and are used in the CORSIA must be appropriately accounted for in line with the relevant and applicable international provisions, as stated in the EUC Guidelines, in particular through corresponding adjustments by the host country consistent with the Article 6.2 Guidance under the Paris Agreement, regardless of the sector, gas, activity type or country in which the mitigation occurred.
 - ii. Update Isometric's procedures regarding the contents of host-country attestations, to ensure that the accounting and reporting steps described in the host-country attestations are consistent with Article 6.2 Guidance.
 - iii. Establish procedures to address changes to the number, scale, and/or scope of host country attestations.
 - iv. Delete or update Option 1 of Isometric's *Double claiming reconciliation procedure*, to ensure that (a) the Corresponding Adjustments Buffer Pool is shared across all Project Proponents; and (b) a sufficient quantity of replacement CORSIA-eligible units will be procured to reconcile all double-claiming in the event that this buffer pool is exhausted.
 - v. Update or delete Option 2 of Isometric's *Double claiming reconciliation procedure*, to ensure (a) that the programme will not prevent the retirement of any unit that has been labelled CORSIA-eligible for the relevant CORSIA compliance period, (b) in respect of any such units, that all instances of double-claiming are reconciled in accordance with the EUC and Guidelines.

4.3.10.5 TAB also recommends that the Council request Isometric to undertake these further actions, which would not need to be taken prior to adding Isometric to the ICAO document titled "CORSIA Eligible Emissions Units":

- (f) Include version numbers and dates in each of Isometric's "Governance and Policies" documents.
- (g) List all ongoing public consultations by Isometric in a single, easily accessible location on the programme website, which should also include records of completed public consultations.
- (h) For activities involving greenhouse gases other than carbon dioxide (CO₂), establish procedures to reconcile any differences between the Global Warming Potential (GWP) values used by the programme and in the host country's national greenhouse gas accounting, such that only one unit is issued for one tonne of mitigation.

- (i) Update Isometric’s third-party validator/verifiers accreditation requirements to ensure that, where accreditation is provided by a governmental or intergovernmental regulatory body other than a member of the International Accreditation Forum, that it demonstrates compliance with all required verification needs and competencies set out in Isometric procedures.
- (j) Update Isometric’s procedures to clarify precisely when exceptions to the five-year crediting period maximum are allowed, if at all.
- (k) At the earliest opportunity, but no later than TAB’s re-assessment of programmes for eligibility toward the 2027-2029 compliance period, demonstrate that procedures provide for baselines that are set in a conservative way and *below the business-as-usual emissions projections*, noting that non-traditional methods for baseline-setting should deliver equivalent outcomes.

4.3.11 Premium Thailand Voluntary Emission Reduction Program (Premium T-VER)

4.3.11.1 In light of the Premium T-VER’s procedural updates submitted in April 2024 for assessment in TAB’s 2024 material change assessment cycle (MCA/2024), TAB recommends that that Council update the Further actions requested of the programme, in light of progress that the programme has made in implementing the previously requested actions (Section 4.3.11.5 below).

Background on programme status

4.3.11.2 The Premium T-VER programme was created by the Government of Thailand in 2023, based in part on feedback from TAB’s assessment of the original T-VER programme during TAB’s 2019 assessment cycle.²⁴

4.3.11.3 Premium T-VER first applied for assessment by the TAB in March 2023. In November 2023, the Council accepted TAB’s recommendation that Premium T-VER should be eligible for first phase (2024-2026 compliance period), pending programme’s implementation of further actions requested by the Council.

4.3.11.4 As further explained in its September 2023 Report to Council,²⁵ TAB found that Premium T-VER demonstrated technical consistency with some, but not all, contents of the following criteria: Program governance; Transparency and public participation provisions; Identification and tracking; Carbon offset credits must be quantified, monitored, reported, and verified; Carbon offset credits must be based on a realistic and credible baseline; Permanence; and Only counted once towards a mitigation obligation. These findings informed the Further actions requested of the programme recommended in section 4.3.7.5 of September 2023 TAB Report.

4.3.11.5 In November 2023, Council requested Premium T-VER was requested to take the following actions to satisfy its eligibility conditions, and to provide evidence of such for TAB’s review and recommendation and Council’s consideration, prior to Council finalizing its eligibility for the first phase (2024-2026 compliance period):

- b) Put in place a complete plan for the long-term administration of multi-decadal programme elements, in particular for emissions units issued, held, and/or cancelled/retired on the registry and associated

²⁴ See section 4.2.1.2 of TAB’s January 2020 Report to Council (Appendix B to the CWP-15001)

²⁵ Appendix B of the C.230 WP-15523

documentation of the activities and ownership, which includes possible responses to the dissolution of the programme in its current form;

- c) Formalize and disclose Premium T-VER's existing practices for what information is captured and made available to different stakeholders;
- d) Put procedures in place requiring that a re-evaluation of baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario, for any Premium T-VER activity that wishes to undergo verification but has not done so within an allowable number of years between verification events determined by the programme;
- e) Enhance Premium T-VER non-permanence buffer credit management procedures to ensure that the programme will fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA, including in the event that the project developer defaults on its buffer pool obligations, ensuring that replacement units will also be from those eligible for use under the CORSIA;
- f) Further develop and formalize a complete suite of procedures necessary to prevent double-claiming, consistent with the criterion Only counted once towards a mitigation obligation and the relevant Guidelines, mindful of TAB's considerations and analysis contained in the document *Clarifications of TAB's Criteria interpretations*. Further actions should address the following:
 - i. Formalize and disclose Premium T-VER's practices regarding host-country letters of attestation, including: (1) the minimum information required in such letters for activities generating CORSIA eligible units, and (2) where the letters of attestations will be published and related to the relevant activity's entries in the TGO registry;
 - ii. Establish and disclose the procedure for regularly comparing quantities of units in the TGO registry against reporting by the UNFCCC National Focal Point, in order to prevent any instances of double-claiming, and to report any discrepancies to ICAO; and,
 - iii. Establish and disclose procedures for Premium T-VER, or proponents of the activities it supports, to fully 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.

4.3.11.6 Also in November 2023, Council requested Premium T-VER to undertake these further actions, which did not need to be taken prior to adding Premium T-VER to section II of the ICAO document titled "CORSIA Eligible Emissions Units":

- a) At the earliest opportunity, update, or finalize updates to, the programme registry to enhance consistency with all requirements in the Emissions Unit Programme Registry Attestation, Part B, Paragraph 7.10, including for the registry to record cancellation information required in the CORSIA SARPs Appendix 5, Table A5-7²⁶, through discrete, standardized fields in a downloadable and machine-readable format (e.g., XLS, CSV), that is available to public users at no cost and with no credentials required;

²⁶ Required fields for reporting emissions unit cancellations: Aeroplane operator in whose name the unit was cancelled {name}; Compliance period {for which units were cancelled}; Quantity of units cancelled {in a given batch}; Start of serial number range {by batch}; End of serial number range {by batch}; Date of cancellation; Name of programme; Unit type {e.g., VER, CRT}; Host country; Methodology {alpha/numeric identifier}; Unit vintage {year}.

- b) Put procedures in place for Premium T-VER to (1) periodically monitor formal developments related to any CDM methodologies, processes and institutions, requirements, and/or tools that are incorporated into the programme or referenced in its programme documents, (2) respond to substantive updates, revisions, or other changes to those CDM contents, as appropriate, to maintain the programme's coherence and effectiveness, and (3) publicly report any actions or decisions taken thereon.

Summary of material procedural updates

4.3.11.7 In April 2024, the Premium T-VER submitted updates (as “material changes”) to programme procedures designed to address some of the further actions requested by Council described in para 4.3.11.5 above.

General findings

4.3.11.8 TAB found that Premium T-VER's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2023, supplemented by material changes submitted for TAB's assessment in April 2024, were largely consistent with the contents of the EUC as TAB applied them in its eligibility re-assessments for the first phase (2024-2026 compliance cycle), for emissions units generated under the programme from 1 January 2021 through 31 December 2026, pending its completion of the updated *Further actions requested* of the programme recommended in section 4.3.11.13 further down.

4.3.11.9 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Carbon offset credits must be based on a realistic and credible baseline, taking into account TAB's interpretation that “conservative” means that procedures should provide for baselines that are set “in a conservative way *and below the business-as-usual emissions projections*”, following from TAB's considerations and analysis of the COP26 outcomes on Article 6 of the Paris Agreement (see para. 6.5.17 of September 2022 TAB Report and para. 2(a) and (g) of C-DEC 227/4). This common finding is further discussed in Section 4.4 of TAB's January 2023 Report to Council and informed the *Further action requested of the programme* in section 4.3.11.14 below.

4.3.11.10 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criteria Carbon offset credits must be quantified, monitored, reported, and verified; Realistic and credible baselines; and Additionality. For activities involving grid-connected renewable energy generation/supply, this finding is discussed in section 4.4.4 further down.

4.3.11.11 TAB found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Leakage. For activities that involve replacing equipment or other physical systems, this criterion addresses emissions from the replaced equipment, *e.g.*, from its disposal/decommissioning, continued use, *etc.* This finding informed the *Further actions requested* of the programme set out in section 4.3.11.14 below.

4.3.11.12 TAB also found that the programme demonstrated technical consistency with most, but not all, contents of the criterion Only counted once toward a mitigation obligation. This finding is discussed in section 4.4.6 further down and informed the *Further actions requested of the programme* set out in section 4.3.11.13 below.

Further actions requested of the programme

4.3.11.13 TAB recommends that Council request Premium T-VER to undertake the further actions described in para. a) to e) below, which Premium T-VER is invited to submit for TAB to assess and make recommendations to Council as necessary to finalize the conditional eligibility of units issued under these programme elements. These requested further actions supersede such actions requested by Council in September 2023 (see para 4.3.11.5 above):

- a) Formalize into programme requirements and procedures Premium T-VER's existing practices for what information must be captured and made available to different stakeholders;
- b) Develop programme procedures to clarify the integration between Premium T-VER and JCM Thailand-Japan, including which programme's procedures apply for each methodology, activity, and unit; and whether/how emissions units can move between the T-VER and JCM registry systems,
- c) Finalize and publish the regulation *Regulation of the Board of Directors of TGO re: rules for registration of purchases, sales, and transfers of carbon credits (No. 2), B.E. 2567 (2024)*, which was shared with TAB in draft form, and operationalize the relevant clauses of this regulation in Premium T-VER's publicly available programme procedures, particularly those governing the activity cycle;
- d) Establish an indicator in the Premium T-VER registry to track, for each emissions unit issued, whether the corresponding adjustment has been applied and fully reflected in the host country's biennial transparency report (BTR),
- e) Establish and disclose procedures for Premium T-VER, or proponents of the activities it supports, to fully 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, taking into account the Criteria interpretations contained in section 4.4.6 of TAB's September 2024 to Council.

4.3.11.14 TAB also recommends that Council re-iterate the *Further actions requested* in section 4.3.11.6 above, with the additional paragraphs (c)-(d) below, which would not need to be taken prior to adding T-VER to section II of the ICAO document titled "CORSIA Eligible Emissions Units".

- c) Establish a reversal risk buffer pool that is shared across all T-VER projects involving GHG removals with material risks of reversal.
- d) Update programme-level requirements and procedures relating to Leakage, including to ensure that, where an activity involves replacing equipment or other physical systems such that these comprise the activity's baseline, the baseline equipment is demonstrably decommissioned, destroyed, or scrapped, or otherwise demonstrated to no longer be in use, and emissions from its disposal are discretely assessed, mitigated where possible, and deducted from the verified results of the activity; or where procedures enable the baseline equipment to potentially be re-sold or otherwise remain in use (including beyond the project boundary), equivalent procedures for assessment, mitigation, and accounting deductions should also apply to emissions resulting from its continued use.

4.3.12 Programmes invited to re-apply

4.3.12.1 TAB recommends that the following emissions unit programmes should be invited to re-apply:

- BioCarbon Standard (BCS) (see details in section 4.3.13)
- KCCI Carbon Standard (KCS) (see details in section 4.3.14)

- Puro.earth (see details in section 4.3.15)
- Reverse (see details in section 4.3.16)

4.3.12.2 The specific findings by TAB in terms of criteria consistency and areas for further developments are provided in sections 4.3.13, 4.3.14, 4.3.15 and 4.3.16. further down. TAB will consider re-assessing these programmes once changes to the programme procedures are in place and the programme provides such information to the TAB in line with a future call for applications.

4.3.13 **BioCarbon Standard (BCS)**

Criteria consistency

4.3.13.1 TAB recommends that eligibility decisions regarding BioCarbon Standard (BCS) should not be taken at this time. TAB found that BCS's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2024 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards.

4.3.13.2 TAB found that BCS demonstrated technical consistency with the contents of the following criteria: Program governance; Transparency and public participation provisions; Safeguards system; Sustainable development criteria; Do no net harm; Identification and tracking; Validation and verification procedures; Carbon offset credits must be quantified, monitored, reported, and verified; Clear and transparent chain of custody; Scope considerations;

Areas for further development

4.3.13.3 TAB found that BCS demonstrated technical consistency with some, but not all, contents of the following criteria: Legal nature and transfer of units; Offset credit issuance and retirement procedures; Clear methodologies and protocols, and their development process; Additionality; Realistic and credible baselines; Permanence; Leakage; Avoidance of double counting, issuance and claiming; Only counted once towards a mitigation obligation.

4.3.13.4 TAB would like to encourage BCS to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all of the EUC. TAB will assess the programme again once changes to the programme procedures are in place, corresponding to each criterion listed in para. 4.3.13.3 above, and the programme provides such information to TAB in line with a future call for applications.

4.3.14 **KCCI Carbon Standard (KCS)**

Criteria consistency

4.3.14.1 TAB recommends that eligibility decisions regarding KCS should not be taken at this time. TAB found that KCS's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2024 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards.

4.3.14.2 TAB found that KCS demonstrated technical consistency with the contents of the following criteria: Legal nature and transfer of units; Validation and verification procedures; Carbon offset credits must be quantified, monitored, reported, and verified; Clear and transparent chain of custody; Clear methodologies and protocols, and their development process; Scope considerations.

Areas for further development

4.3.14.3 TAB found that KCS demonstrated technical consistency with some, but not all, contents of the following criteria: Program governance; Identification and tracking; Transparency and public participation provisions; Safeguards system; Sustainable development criteria; Do no net harm; Offset credit issuance and retirement procedures; Additionality; Realistic and credible baselines; Permanence; Leakage; Avoidance of double counting, issuance and claiming; Only counted once towards a mitigation obligation.

4.3.14.4 TAB would like to encourage KCS to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all of the EUC. TAB will assess the programme again once changes to the programme procedures are in place, corresponding to each criterion listed in para. 4.3.14.3 above, and the programme provides such information to TAB in line with a future call for applications.

4.3.15 **Puro.earth**

Criteria consistency

4.3.15.1 TAB recommends that eligibility decisions regarding Puro.earth should not be taken at this time. TAB found that Puro.earth's procedures, standards, and related governance arrangements that were in place and assessed by TAB in 2024 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards.

4.3.15.2 TAB found that Puro.earth demonstrated technical consistency with the contents of the following criteria: Legal nature and transfer of units; Transparency and public participation provisions; Sustainable development criteria; and Clear methodologies and protocols, and their development process.

Areas for further development

4.3.15.3 TAB found that Puro.earth demonstrated technical consistency with some, but not all, contents of the following criteria: Program governance; Carbon offset credits must be quantified, monitored, reported, and verified; Safeguards system; Do no net harm; Identification and tracking; Validation and verification procedures; Clear and transparent chain of custody; Scope considerations; Offset credit issuance and retirement procedures; Additionality; Realistic and credible baselines; Permanence; Leakage; Avoidance of double counting, issuance and claiming; Only counted once towards a mitigation obligation.

4.3.15.4 TAB would like to encourage Puro.earth to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all of the EUC. TAB will assess the programme again once changes to the programme procedures are in place, corresponding to each criterion listed in para. 4.3.15.3 above, and the programme provides such information to TAB in line with a future call for applications.

4.3.16 **Riverse**

Criteria consistency

4.3.16.1 TAB recommends that eligibility decisions regarding Riverse should not be taken at this time. TAB found that Riverse's procedures, standards, and related governance arrangements that were in place

and assessed by TAB in 2024 were partially consistent with the contents of the EUC, for emissions units generated under the programme for mitigation that occurred from 1 January 2021 onwards.

4.3.16.2 TAB found that Riverse demonstrated technical consistency with the contents of the following criteria: Legal nature and transfer of units; Transparency and public participation provisions; Sustainable development criteria; Validation and verification procedures; Carbon offset credits must be quantified, monitored, reported, and verified; and Clear methodologies and protocols, and their development process.

Areas for further development

4.3.16.3 TAB found that Riverse demonstrated technical consistency with some, but not all, contents of the following criteria: Program governance; Safeguards system; Do no net harm; Offset credit issuance and retirement procedures; Identification and tracking; Clear and transparent chain of custody; Scope considerations; Additionality; Realistic and credible baselines; Permanence; Leakage; Avoidance of double counting, issuance and claiming; Only counted once towards a mitigation obligation.

4.3.16.4 TAB would like to encourage Riverse to re-engage in TAB's assessment process once it is confident that its procedures are in a steady state and meet all of the EUC. TAB will assess the programme again once changes to the programme procedures are in place, corresponding to each criterion listed in para. 4.3.16.3 above, and the programme provides such information to TAB in line with a future call for applications.

4.3.17 Applicants not possible to assess

4.3.17.1 TAB was unable to fully assess the following applicant organizations at this stage, due to either their early stage of development, or because key elements of an emissions unit programme, in line with the EUC and TAB's interpretations, were not in place at the time of TAB's assessment:

- Asia Carbon Institute (ACI) (see details in Section 4.3.18)
- C-Capsule (see details in Section 4.3.19)
- Carbon Asset Solutions (CAS) (see details in Section 4.3.20)
- Ecosystem Restoration Standard (ERS) (see details in Section 4.3.21)
- International Carbon Registry (see details in Section 4.3.22)
- POPL Standard (see details in Section 4.3.23)

4.3.18 Asia Carbon Institute (ACI)

General findings

4.3.18.1 TAB was unable to fully assess Asia Carbon Institute against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB's assessment. In particular, ACI had no unique methodologies nor a project pipeline at the time of application and some procedures remained under development during TAB's assessment. ACI may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

4.3.19 C-Capsule

General findings

4.3.19.1 TAB was unable to fully assess C-Capsule against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB’s assessment. In particular, C-Capsule had no public registry at the time of application and its procedures continued to evolve during TAB’s assessment. C-Capsule may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

4.3.20 **Carbon Asset Solutions (CAS)**

General findings

4.3.20.1 TAB was unable to fully assess CAS against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB’s assessment. In particular, several required procedures and processes were not in place and publicly disclosed at the time of application and these procedures continued to evolve during TAB’s assessment. CAS may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

4.3.21 **Ecosystem Restoration Standard (ERS)**

General findings

4.3.21.1 TAB was unable to fully assess ERS against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB’s assessment. In particular, ERS was planning to undertake significant changes to its procedures during TAB’s 2024 Assessment Cycle, such that TAB would be unable to conclude its assessment of the updated procedures in line with its agreed Work Programme and Timeline. ERS may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

4.3.22 **International Carbon Registry (ICR)**

General findings

4.3.22.1 TAB was unable to fully assess ICR against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB’s assessment. In particular, the programme does not have unique methodologies and several required procedures and processes were not in place at the time of application. ICR also launched a major revision of its procedures in July 2024, such that TAB would be unable to conclude its assessment of the updated procedures in line with its agreed Work Programme and Timeline. ICR may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

4.3.23 **POPLE Standard**

General findings

4.3.23.1 TAB was unable to fully assess POPLE Standard against the EUC because key elements of an emissions unit programme, in line with the EUC and section 7.12–7.13 of the TAB Procedures, were not in place at the time of TAB’s assessment. In particular, procedures and processes for preventing double-claiming against nationally determined contributions under the Paris Agreement were not in place at the

time of application. POPLÉ may re-apply for assessment once it has requirements, procedures and systems in place that are responsive to all the EUC.

4.4 CRITERIA INTERPRETATIONS

4.4.1.1 The following discussions were undertaken by TAB Members to agree on interpretations of the EUC or their guidelines, in order to find consensus on TAB recommendations, including those presented in Section 4.3 of this report. Where TAB discussed and agreed to specific interpretations in order to apply a criterion or guideline to the wide variety of programmes assessed, this section also presents those interpretations.

4.4.1.2 TAB reaffirmed the relevance of Criteria interpretations in successive TAB Reports, which are compiled into a document titled *Clarifications of TAB's Criteria Interpretations Contained in TAB Reports* and published on the TAB website for transparency. Reflecting on this work, TAB noted with appreciation that programmes continue to make progress in enhancing their procedures to bring them more clearly in line with the EUC. TAB looks forward to reviewing this continuing progress during its forthcoming assessment cycles.

4.4.2 Criteria: Multiple

4.4.2.1 Carbon dioxide removal (CDR) activities are designed to remove CO₂ from the atmosphere and store it durably in, geological, terrestrial, or ocean reservoirs, or in products.

4.4.2.2 Several CDR activity types are already widely practiced, including in carbon credit markets, namely afforestation, reforestation, some improved forest management, agroforestry and soil carbon sequestration.²⁷ Experiences with these activity types have informed best practices for quantification, monitoring, reporting and verification of CO₂ removals, as well as for applicable laws and regulations; environmental and social safeguards; procedures to address risks of non-permanence and carbon leakage; etcetera. These experiences and best practices informed existing international rules and guidelines, including the CORSIA Emissions Unit Criteria, the IPCC Guidelines for National Greenhouse Gas Inventories, and decisions adopted under the UNFCCC and its related legal instruments, including Articles 4, 6 and 13 of the Paris Agreement.

4.4.2.3 During its 2024 assessment cycle, TAB assessed a few emissions unit programmes that focus primarily on novel carbon dioxide removal (CDR) methods, for example: biochar, direct air capture with carbon capture and storage (DACCS), bioenergy with carbon capture and storage (BECCS), enhanced weathering (EW), 'blue carbon management'²⁸, ocean fertilization and ocean alkalinity enhancement (OAE). Some other emissions unit programmes are also beginning to develop methodologies and projects for some of these types of activities.

4.4.2.4 TAB noted that the CORSIA Emissions Unit Criteria and Guidelines are relevant for these novel CDR activity types and discussed some possible particularities regarding their application. For example, TAB noted possible intersections with the criteria Safeguards system, No net harm, Carbon offset credits must be quantified, monitored, reported, and verified, Realistic and credible baselines, Permanence, Leakage, and Only counted once towards a mitigation obligation. TAB also noted that, for some novel CDR activity types, existing examples of demonstration-scale activities are few and only very recent, such that international rules and best practices remain in a state of evolution. TAB also noted that novel CDR

²⁷ IPCC AR6 WGIII SPM para C.11.1, last sentence.

²⁸ This is distinct from peatland and coastal wetland restoration, which is already widely practiced.

demonstration activities typically have high costs, such that they are unlikely to displace more established activity types in the near term.

4.4.2.5 In this regard, TAB discussed the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (2023), which notes that “the deployment of CDR to counterbalance hard-to-abate residual emissions is unavoidable if net zero CO₂ or GHG emissions are to be achieved.” The report also notes that “[e]nablers of CDR include accelerated research, development and demonstration, improved tools for risk assessment and management, targeted incentives and development of agreed methods for measurement, reporting and verification of carbon flows.”²⁹

4.4.2.6 The IPCC, at its 60th session (January 2024), requested its Task Force on National Greenhouse Gas Inventories to develop a new *Methodology Report on Carbon Dioxide Removal Technologies, Carbon Capture Utilization and Storage* by 2027, as part of the IPCC’s Seventh Assessment Cycle. The Task Force aims to, among other things, identify gaps relating to CDR activities within the *2006 IPCC Guidelines on National GHG Inventories* and/or identify areas where elaboration of the Guidelines would be desirable.

4.4.2.7 In light of these considerations, TAB resolved to continue to apply the EUC in the manner described in its Criteria interpretations, to further clarify these interpretations where appropriate, and to monitor ongoing developments, including in the Article 6 context and the IPCC’s Methodology Report.

4.4.3 **Criterion: Realistic and credible baselines**

4.4.3.1 The criterion Carbon offset credits must be based on a realistic and credible baseline states, among other things, that “[t]he baseline is the level of emissions that would have occurred assuming a conservative ‘business as usual’ emissions trajectory...”.

4.4.3.2 TAB recalled para. 6.5.17 of its September 2022 report to Council, in which TAB resolved to interpret this criterion’s reference to “conservative” to mean that procedures should provide for baselines that are set “in a conservative way and below the business-as-usual emissions projections”, as referenced in the reporting requirements in the Article 6.2 Guidance.³⁰ In C-DEC 231/2 (11 March 2024), Council approved a recommendation from the Committee on Aviation Environmental Protection (CAEP) to incorporate this interpretation into a new Guideline.

4.4.3.3 TAB also recalled that the Article 6.4 guidelines state that methodologies may “recognize suppressed demand”.³¹ Such methodologies typically set baselines slightly above a conservative ‘business as usual’ (BAU) projection in contexts where emissions are historically low due to underdevelopment, *e.g.*, by using optimistic growth assumptions and/or ‘minimum service levels’ in emissions models. As noted in para. 6.5.15 of TAB’s September 2022 Report to Council, there is limited clarity on how to interpret the new ‘below BAU’ provisions in contexts of suppressed demand.

4.4.3.4 TAB discussed recent developments in tools and methodologies for determining the fraction of woody biomass that can be established as non-renewable biomass (fNRB). This variable is used in baseline formulae for activities that reduce or displace the use of non-renewable biomass. An October 2023 information note for the CDM Executive Board³² and a January 2024 paper in the journal *Nature*

²⁹ IPCC AR6 WGIII SPM para C.11 first sentence and C.11.1, first sentence.

³⁰ Decision 2/CMA.3, Annex, para 18(h)(ii)

³¹ Decision 3/CMA.3, Annex, para 33

³² Document number CDM-MP92-A07, available at https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20231012184345703/MP92_EA07_Information%20Note_fNRB%20values_collated.pdf

*Sustainability*³³ found that older methods for calculating fNRB likely overestimate emissions reductions for these activities. Some of these activities also incorporate elements of suppressed demand.

4.4.3.5 Reflecting on these considerations, TAB noted that continuous improvement is a normal feature of GHG estimation, including in the context of carbon credit markets, and that at least one emissions unit programme is adjusting its approach.

4.4.3.6 TAB resolved to continue monitoring ongoing developments on this matter, including in the Article 6 context. TAB also resolved to take these developments into account during its 2025 re-assessment cycle, which will inform its recommendations to Council on eligible emissions units during the 2027-2029 compliance period.

4.4.4 **Criteria: Additionality, Realistic and credible baselines and Leakage**

4.4.4.1 The criterion Additionality requires, among other things, that CORSIA eligible emissions units represent GHG mitigation “that exceed[s] any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario”. To that end, it requires programmes to have procedures in place that “provide reasonable assurance that the emissions reductions would not have occurred in the absence of the offset programme.”

4.4.4.2 A related criterion Realistic and credible baselines requires, among other things, that “methods of developing baselines, including modeling, benchmarking or the use of historical data, use assumptions, methodologies, and values that do not over-estimate mitigation from an activity.” A baseline is the emissions level against which quantities of emissions reductions or removals are calculated. In March 2024, Council adopted a new EUC Guideline requiring that baselines be set “*below* business-as-usual”, in line with recent rules and guidance under Article 6 of the Paris Agreement.³⁴

4.4.4.3 TAB recalled that concerns have been long raised about some methodologies, tools and approaches for quantifying emissions units from renewable electricity generation, particularly relating to the criteria Additionality and Realistic and credible baselines. For example, there have been questions about assumptions used for baseline grid emissions factors, investment rates of return, the role of complementary policy incentives and defining common practice in this rapidly evolving sector. Concerns about the use of grid emissions factors in baseline-setting also relate to the risk of emissions Leakage, for example, when these activities take place in contexts of increasing energy demand. TAB noted that these concerns affect some, but not all, emissions units issued for renewable electricity generation. Several programmes have taken steps in light of these concerns: some have improved their tools and methodologies, others have limited their use to certain applications, and some have exited the electricity sector entirely. A few programmes continue to use tools and methodologies that are similar to, or even less conservative than, conventional approaches.

4.4.4.4 In this context, TAB recalled that the Conference of Parties serving as the Meeting of the Parties to the Paris Agreement (CMA) has requested the Article 6.4 Supervisory Body to, among other things, review existing Clean Development Mechanism (CDM) methodologies and tools with a view to applying them with revisions, as appropriate, and/or developing similar tools under the new Article 6.4

³³ Annelise Gill-Wiehl et al., “Pervasive over-crediting from cookstove offset methodologies”, *Nature Sustainability* 7, 191-202 (2024). Available at <https://www.nature.com/articles/s41893-023-01259-6>

³⁴ For further discussion on “below business as usual”, see section 6.5.13 to 6.5.17 of TAB’s September 2022 Report to Council and section 4.4.3 to 4.4.6 of TAB’s January 2023 Report to Council. The relevant excerpts are compiled in the document “Clarification of TAB’s criteria interpretation contained in TAB Reports” on the ICAO TAB website https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/TAB2024/Clarifications_March2024.pdf >

mechanism.³⁵ Renewable electricity activities using existing CDM tools and methodologies may continue to do so, with approval from the host country, “until the earlier of the end of its current crediting period or 31 December 2025.”³⁶ TAB noted that this ongoing review covers CDM tools and methodologies that other emissions unit programmes have incorporated or adapted, including for activities in the electricity sector.

4.4.4.5 In accordance with section 7.9 of its Procedures, TAB follows “a prudent, conservative, and risk-averse approach to evaluation, given that all decisions will be marked by some degree of uncertainty, in order to recommend for use units from emissions unit programmes that meet the EUC with a very high degree of confidence.” While acknowledging that the scale of an activity is not necessarily a proxy for integrity, in order to limit the risk to the CORSIA scheme, TAB recommends in this report that, for the time being, only small-scale activities involving grid-connected renewable electricity generation/supply should be eligible during CORSIA’s first phase (2024-2026 compliance period).

4.4.4.6 Mindful of these considerations, TAB resolved to continue to monitor ongoing developments on this matter, including in the Article 6 context, with the aim of providing further recommendations on programmes supporting these activity types in the course of its near-term assessments, and to take these developments into account during its 2025 re-assessment cycle, which will inform its recommendations to Council on eligible emissions units during the 2027-2029 compliance period.

4.4.5 **Criterion: Permanence**

4.4.5.1 The criterion Permanence states that “Carbon offset credits must represent emissions reductions, avoidance, or carbon sequestration that are permanent. If there is risk of reductions or removals being reversed, then either (a) such credits are not eligible or (b) mitigation measures are in place to monitor, mitigate, and compensate any material incidence of non-permanence.”

4.4.5.2 As noted in section 4.3.2.1 to 4.3.2.6 of its January 2020 Report to Council, emissions unit programmes take multi-pronged approaches to mitigating reversal risks, many of which are captured in the EUC Guidelines, and should be assessed as a package. The Guidelines identify key aspects of a complete Permanence package, including: *Risk assessment, Reversal risk monitoring and mitigation, Reversal notification and liability, Extent of compensation provisions, Replacement unit eligibility, and Review of compensation measure performance.*

4.4.5.3 In its assessments of emissions unit programmes since 2019, TAB noted that several programmes use “reserve accounts” or “buffer pools” as part of their packages of procedures to address reversal risk. Under such approaches, a portion of the units issued for an activity are set aside by the programme. In the event of a reversal of mitigation from the activity, *e.g.*, due to a natural disturbance or human actions, the reserved/pooled units are used to compensate for other units that were affected by a reversal event. TAB noted that the required contributions to reserves/pools vary widely between programmes, activity types and individual activities. TAB also noted that some reserves/pools are dedicated to a single activity or activity proponent, while others are shared across all activities supported by the programme, and some programmes use combinations of reserves/pools.

4.4.5.4 The EUC Guideline on *Extent of compensation provisions* states, among other things, that “[t]he programme should have provisions in place to ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA.” While

³⁵ UNFCCC Decision 3/CMA.3, para. 5

³⁶ UNFCCC Decision 3/CMA.3, Annex, para. 73(d)

emphasizing that TAB assesses Permanence procedures as a package, TAB noted some best practices that can help programmes demonstrate their willingness and ability to fully compensate for the reversals:

1. Programme tools/guidance to support activities to undertake reversals risk assessments are required and provided at the programme-level (not only at the methodology level).
2. Reversal risk assessments identify all material risk factors/causes; quantify their respective scales and likelihoods; require mitigation and monitoring for each factor/cause; and produce an aggregate risk rating for each activity, which is updated specified time intervals and/or milestones based on monitoring data. The extent, frequency and duration of monitoring can vary depending on the materiality of the reversal risk.
3. The data from reversal risk assessments and monitoring are documented and subject to third-party validation/verification, and their results inform the required contributions by each activity to the reserve account / buffer pool.
4. Risk reserves/pools that are larger, and that cover a diversity of activities, activity types, activity proponents and activity locations/jurisdictions, are better able to manage higher risks than smaller, more activity-specific reserves/pools.
5. The Programme should commit to compensate for any reversal of mitigation from an event that exceeds the holdings of the reserve account / buffer pool.

4.4.6 **Criterion: Only counted once toward a mitigation obligation**

Guideline: Comparing unit use against national reporting

4.4.6.1 The Guideline Comparing unit use against national reporting states that “[t]he programme should 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.”

4.4.6.2 As noted in section 6.5.14 of TAB’s September 2022 Report to Council, the host country’s national reporting obligations are triggered upon the “first transfer” of a mitigation outcome authorized for international mitigation purposes, which the host country may specify as either (1) the authorization, (2) the issuance or (3) the use or cancellation of the mitigation outcome.³⁷ Section IV of the Article 6.2 Guidance requires host countries to report information at specific intervals on the mitigation outcomes they have first transferred, including in the Initial report; Annual information, and the Biennial Transparency Report.

4.4.6.3 TAB noted that a programme’s procedures for *Comparing unit use against national reporting* would typically cover the time period from when a CORSIA-eligible unit was “first transferred” until the Programme has verified that that the unit is correctly reflected in the quantities of mitigation outcomes and corresponding adjustments reported pursuant to paragraph 23(a) to (k) of the Article 6.2 Guidance (Annex to Decision 2/CMA.3).

³⁷ Decision 2/CMA.3, Annex, para. 2(b)

4.4.6.4 TAB considered the possibility that a host country might then attempt to undo its corresponding adjustment in a subsequent BTR, e.g., in the BTR that covers the end year of the NDC implementation period and determines whether or not the country has achieved its NDC.³⁸ TAB noted that these ‘final’ BTRs will not be due until 2032 and are subject to an Article 6 Technical Expert Review, which should be able to detect any time-series inconsistencies. TAB concluded that such inconsistencies could be addressed on a case-by-case basis at that time.

4.4.6.5 In light of these considerations, TAB resolved to continue to apply the EUC in the manner described in its Criteria interpretations, to further clarify these interpretations where appropriate, and to monitor ongoing developments, including in the Article 6 context. TAB also resolved to re-assess the implementation of this Guideline no later than during its 2032 re-assessment cycle, which would inform its recommendations on eligible unit programmes for the 2033-2035 compliance period.

Guideline: Reconciliation of double-claimed mitigation

4.4.6.6 The EUC guideline on *Reconciliation of double-claimed mitigation* states that “[t]he programme should 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.” In C-DEC 231/2 (11 March 2024), Council approved a recommendation by the CAEP to further specify that this Guideline applies “including in the instance that the application is withdrawn.”

4.4.6.7 In section 4.4.13 to 4.4.14 of its January 2024 report to Council, TAB discussed the status of implementation of this Criterion by emissions unit programmes:

“In its assessments to date, TAB has found that two programmes have procedures in place that fully demonstrate this criterion, including its guideline on *Reconciliation of double-claimed mitigation*. TAB has also found that some other programmes only partially demonstrated consistency with this guideline’s requirement to ‘compensate for, replace, or otherwise reconcile double-claimed mitigation.’ In the latter cases, TAB could identify scenarios in which the programme, or the proponents of the activities it supports, could refuse – or be unable – to fully compensate for, replace or otherwise reconcile the double-claimed mitigation. These scenarios would leave the affected Aeroplane Operator liable for replacing units that it had purchased and cancelled in good faith.”

Responsibility to reconcile double-claiming

4.4.6.8 During TAB’s 2024 assessment cycle, some applicant programmes proposed to prevent double-claiming by removing or declining to apply a CORSIA-eligibility label *before* the unit is cancelled for use in the relevant CORSIA compliance period. Under this approach, once a programme determines that the host country is unable or unwilling to apply a corresponding adjustment, the programme would at least temporarily prevent the unit(s) cancellation for use in CORSIA and the affected Airline Operator would need to find replacement units to meet its CORSIA obligations. TAB determined that such an approach would not be consistent with decisions by Council.

4.4.6.9 Emissions Unit Programmes do not have the discretion to unilaterally narrow their Scope of CORSIA-eligibility for a given compliance period. Rather, the *Convention on International Civil Aviation*

³⁸ Decision 2/CMA.3, Annex, para. 23(l).

defines CORSIA Eligible Emissions Units as “those units described in the ICAO document titled “CORSIA Eligible Emissions Units”³⁹ As noted in that document, “[t]he programme must provide for and implement its registry system to identify its CORSIA eligible emissions units *as defined in this document*.”⁴⁰ (Emphasis added) The programme is also required to cancel any such units for the purpose of offsetting requirements under the CORSIA within 1–3 business days of receiving a cancellation request from an Aeroplane Operator or their designated account holder.⁴¹

4.4.6.10 In accordance with C-DEC 222/10 (March 2021), if a programme wishes to “initiate a phase-out of, or cessation of support for, a methodology or activity type that was explicitly permitted in the programme’s Scope of Eligibility, and for which a phase-out of, or cessation from, use in CORSIA may also be appropriate”, then this is considered a “a non-severe programme development” that must be reported to TAB as a material change.⁴² Any resulting narrowing of the programme’s *Scope of Eligibility* applies “from the start of the next three-year compliance period”, such that the affected units remain “valid and eligible for use to meet CO₂ offsetting requirements under the compliance period that was active at the time.” In such cases, the programme’s responsibilities under the Guideline *Reconciliation of double-claimed mitigation* continue to apply until all reporting for that compliance period is complete.⁴³

4.4.6.11 If any emissions unit within a programme’s *Scope of Eligibility* for a particular CORSIA compliance period cannot be cancelled for use in that compliance period, for reasons relating to double-claiming, then the Guideline on *Reconciliation of double-claimed mitigation* does apply.⁴⁴ TAB recalled for emphasis that this Guideline clearly and explicitly assigns responsibility to “the programme, or proponents of the activities it supports” and not to Aeroplane Operators.⁴⁵

Use of third-party guarantees

4.4.6.12 In section 4.4.14 of TAB’s January 2024 report to Council, TAB noted that, for all CORSIA-eligible emissions units generated in respect of mitigation that occurred in 2021 onward, programmes must have procedures in place that:

require clear a commitment by programme, or proponents of the activities it supports, to compensate for, replace, or otherwise reconcile any double-claimed mitigation associated with that unit, and

provide reasonable assurance that they have the capability to deliver on that commitment.

4.4.6.13 In this context, TAB noted a recent proliferation of insurance products designed to ‘guarantee’ that a carbon credit will remain valid and not be double claimed by the host country.⁴⁶ These products commit to pay monetary or in-kind compensation to the policy beneficiary for events affecting a unit’s integrity or market eligibility, such as a host country being unwilling or unable to apply a corresponding

³⁹ Convention on International Civil Aviation, Annex 16, Volume IV, Chapter 4, paragraph 4.2.1

⁴⁰ ICAO document ‘CORSIA Eligible Emissions Units’, footnote 3

⁴¹ *Emissions Unit Programme Registry Attestation*, section 7.4 – 7.5.

⁴² Appendix C to C-WP/15158, paras. 1.1 b), adopted by Council per C-DEC 222/10.

⁴³ Appendix C to C-WP/15158, paras. 2.1, adopted by Council per C-DEC 222/10.

⁴⁴ For further clarity, the requirement for programmes to reconcile double-claimed mitigation issued as CORSIA-eligible units only applies for units used in the same CORSIA compliance period for which they are eligible. It does not necessarily apply to other use cases where the same unit’s eligibility has yet to be determined, e.g., future CORSIA compliance periods, or that are not governed by ICAO.

⁴⁵ For an introduction to the concept of assigning liability, see World Bank Group, “A guide to developing domestic carbon crediting mechanisms”, *Partnership for Market Readiness* (2021), section 10.2.1 (page 97-98).

⁴⁶ For example, AXA XL, Howden Group, Kita Earth Limited, Oka the Carbon Insurance Company, the World Bank Multilateral Investment Guarantee Agency, etc.

adjustment to prevent double-claiming. Although the Guideline assigns responsibility to the programmes to reconcile double-claimed mitigation associated with CORSIA-eligible units (or ensure that their activity proponents are required and able to do so), such insurance products may, in some cases, help the programme provide reasonable assurance of their capability to reconcile double-claimed mitigation, in line with the Criteria interpretation in section 4.4.14 of TAB's January 2024 report to Council.

4.4.6.14 TAB noted for emphasis that it only assesses emissions unit programmes, and that third-party guarantees/insurance are not strictly necessary to prevent double-claiming. However, when a programme's procedures allow for the use of third-party insurance/guarantees in relation to this Guideline, the programme should have procedures in place to require and confirm that such products, among other things:

1. Cover all units that have *Eligible Unit Dates* within the relevant CORSIA compliance period, to which the host country Letter of Authorization applies,
2. The coverage is effective from when the Programme applies a CORSIA-eligibility labels to the emissions units, at least until the Programme has verified that the corresponding adjustments were applied for all units used in the relevant CORSIA compliance period (see section 4.4.6.13 above),
3. Be underwritten by a highly reputable third party that is not affiliated with the host country government or the project proponents of the activity;
4. Should remit either a CORSIA-eligible unit (in kind), or a cash amount sufficient for the programme or the activity proponents to purchase a CORSIA-eligible unit at the time it is needed.

4.4.6.15 In any case, the programme must have procedures in place to ensure that a CORSIA-eligible unit was indeed cancelled to reconcile the double-claimed mitigation from the perspective of the atmosphere. Emissions unit programmes (not Aeroplane Operators) are the entities accountable to ICAO's relevant bodies for the integrity of emissions units generated according to their procedures, including their performance on the avoidance of double claiming.

— END —