

Technical Advisory Body (TAB)

Public comments - 2024 Assessment cycle Applications and material changes

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Name:

Isabella Corpora

Organization:

Carbon Business Council

Date of receipt:

10 May 2024

TAB Public Comment Template Form

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Commenter Name: Isabella Corpora

Commenter Organization: Carbon Business Council

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Isometric	3.1. Clear methodologies and protocols, and their development process	2.1 - 2.11 (Apx. A)	Isometric has developed a suite of extremely rigorous protocols covering several of the main carbon dioxide removal (CDR) pathways. The high standards they have set for those protocols ensure clear, conservative and accurate quantification of carbon removals using the best available science, effectively taking into account uncertainties to deliver robust credits. Their process to develop the protocols has been informed by the latest science and is highly consultative, including drawing on their science

			network of 200+ experts in the carbon removal field, as well as through public consultations.
Isometric	PART 4: Carbon Offset Credit Integrity Assessment Criteria	2.1 - 2.11 (Apx. A)	Isometric's protocols include robust provisions to ensure additionality and establish clear and scientifically rigorous baselines for carbon removal activities. This includes clear delineation of project boundaries, rigorous energy accounting, conservative crediting, clear and stringent feedstock accounting, and many other factors. Isometric's close work with experts across different CDR pathways and modular approach to protocols ensures that their protocols are informed by the latest science and remain consistently up to date with best available science.
Isometric	3.8 Transparency and public participation provisions	2.1 - 2.11 (Apx. A)	Isometric's protocols include a 30-day public consultation on material changes to Protocols and Modules that are published on Isometric's Science Platform. This consultation period allows for scientists, policymakers, and commercialization leaders in the CDR ecosystem to provide their input and expertise. Isometric's clear protocols, which prioritize transparency and public participation, earn them a trustworthy reputation among the CDR and wider carbon crediting ecosystems.
Isometric	4.3 Quantification, monitoring, reporting, and verification	2.1 - 2.11 (Apx. A)	As part of the Isometric standard, each Protocol has Project-based standards outlining which system boundary and emission factors are acceptable and how they relate to the overall quantification of carbon credits. In addition to its current Protocols to ensure the proper monitoring, reporting, and verification (MRV) of all activities, Isometric also advocates for improvements in MRV standards across the industry, including being part of a series of policy efforts to support robust MRV. Isometric also has various procedures in place for identification and tracking.

Isometric	Other / general		Isometric is also a leader advocating for robust MRV in policy. They engage with industry associations, such as the Carbon Business Council, where Isometric participates in various working groups that craft sets of focused policy recommendations. These resources help highlight key challenges for the CDR ecosystem for policymakers and ecosystem actors to use when introducing new frameworks and legislation into the public domain. We regard Isometric's work and perspective as critical to bringing trust and transparency into the CDR industry and towards achieving a net zero economy.
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* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Name:

Nora Cohen Brown

Organization:

Charm Industrial

Date of receipt:

10 May 2024

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Commenter Name: Nora Cohen Brown

Commenter Organization: Charm Industrial

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Isometric	3.1. Clear methodologies and protocols, and their development process	3	Isometric undergoes an extensive development process for its protocols, and includes expert advice for industry, non profit, and academic experts to set a rigorous standard. Crucially, Isometric's business model does not provide for suppliers to contribute financially to protocol development, increasing integrity. In addition, there is a robust consultation process from both

			stakeholders and the public. Isometric is committed to excellence in its development process.
Isometric	PART 4: Carbon Offset Credit Integrity Assessment Criteria	4	Isometric has done extensive work to create the right boundaries for its protocol that ensure that carbon credits are only provided for approaches that meet additionality, permanence, and all other integrity standards. Isometric takes integrity seriously and sets a high bar for credit assessment. Isometric's business model for credit issuance and retirement is removed from the number of credits issued or transacted reducing the risk of over-crediting.
Isometric	Other / general		Isometric has a true focus on scientific integrity, and ensures that all protocol components are informed by expert input. Isometric's high standards would make them extremely qualified for CORSIA.

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Name:

Florian Reber

Organization:

Chloris Geospatial

Date of receipt:

29 April 2024

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Commenter Name: Florian Reber, Head of Partnerships, Chloris Geospatial, florian@chloris.earth

Commenter Organization:

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Ecosystem Restoration Standard	Question 4.3, page 63	"Are quantified, monitored, reported, and verified"	Dear ICAO Representatives, I am participating in this Public Comment on behalf of Chloris Geospatial, a leading organisation in the field of geospatial analysis and remote sensing with expertise in above-ground biomass and forest growth monitoring. We are writing to express our support

			<p>for the Ecosystem Restoration Standard (ERS) in its current application.</p> <p>ERS conducted a rigorous benchmark, which made use of best-in-class datasets to test the underlying quality and accuracy of the data, prior to selecting Chloris Geospatial as their aboveground biomass data provider.</p> <p>At Chloris Geospatial, we believe that ERS' innovative certification model is poised to bring more trust, integrity and funding to high-quality restoration projects around the world. By standardising carbon calculations at the standard level, ERS reduces the primary source of bias inherent in many carbon crediting programmes — the reliance on calculations made by project proponents.</p> <p>It's with this perspective that we recommend the ERS's Quantification Methodology for its adherence to stringent accounting and data quality principles.</p> <p>We support the ERS application and are confident that their methodologies will set new benchmarks in carbon credit quantification and ecosystem restoration.</p> <p>To learn more about the underlying Chloris Methodology, please access our technology documentation on https://www.chloris.earth/resources</p> <p>Thank you for considering our endorsement.</p>
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Name:

Shawn Gagne

Organization:

Cloverly

Date of receipt:

29 April 2024

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Commenter Name: Shawn Gagné, Director of Sustainability, Cloverly, +1-336-255-7921

Commenter Organization:

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment

<p>Ecosystem Restoration Standard (ERS)</p>	<p>Question 3.9 (page 49) Question 4.3 (page 62) and 4.4 (pages 63-68)</p>	<p>A safeguards system is implemented</p> <p>Units are:</p> <ul style="list-style-type: none"> - based on a realistic and credible baseline - quantified, monitored, reported, and verified 	<p>Dear ICAO Representatives,</p> <p>I am writing to express our strong support for the Ecosystem Restoration Standard (ERS) in its application for CORSIA accreditation. At Cloverly, we are committed to empowering businesses in the carbon market, and we believe that the methodologies developed by ERS are perfectly aligned with global sustainability goals. These methodologies not only meet but have the potential to significantly elevate the growth and reliability of the carbon market.</p> <p>Our recent comprehensive due diligence assessment across various market players highlighted ERS as one of the most rigorous and effective standards currently available, surpassing many established names in the sector.</p> <p>What distinguishes ERS is its holistic approach, which considers more than just carbon metrics. ERS requires that each certified project establishes precise, dynamic baselines and maintains continuous monitoring of both ecological restoration efforts and social impacts. This comprehensive oversight ensures that all projects contribute positively and measurably to environmental and community well-being.</p> <p>Given the strong alignment between ERS standards and our sustainability objectives, we are confident that the CORSIA accreditation of ERS would significantly strengthen the integrity and effectiveness of the carbon market. The robust framework provided by ERS is essential for enhancing the credibility and scalability of environmental environmental impact projects.</p> <p>We appreciate your consideration of our endorsement as you evaluate the ERS application for CORSIA accreditation.</p>
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Name:

Brian Toll

Organization:

EDAC Lab

Date of receipt:

29 April 2024

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Commenter Name: Brian Toll, Chief Operating Officer, EDAC Labs Inc. 7042 Virginia Manor Rd, Beltsville, Maryland, USA

Commenter Organization:

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Isometric	3.1. Clear methodologies and protocols, and their development process		As a technology provider, EDAC Labs appreciates the rigor and scientific basis for protocols provided by Isometric. EDAC Labs offers a CDR solution that can be quantitatively measured with very high accuracy, and qualitatively can conform to rigorous reporting and verification protocols. Isometric's methodologies provide a high benchmark for quality, which assures buyers that the removal is real and durable. This is the right standard for CORSIA.

Isometric	PART 4: Carbon Offset Credit Integrity Assessment Criteria		Isometric’s approach, which complies with ISO standards setting processes (including publishing drafts and public comment periods), is inclusive towards a wide variety of viewpoints, which is important to ensure scientific rigor. Additionally, the protocols are module-based, which enables responsiveness to industry needs and innovation. That is, there are many ways to achieve CDR today, and many innovations coming to the CDR marketplace. By providing a baseline protocol plus modules, it is easier for industry to comply, and easier/faster for new modules to be added in response to innovation.

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Name:

Natalia Dorfman

Organization:

Kita Earth Limited

Date of receipt:

28 April 2024

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Commenter Name: Natalia Dorfman, CEO, Kita Earth Limited. Natalia.dorfman@kita.earth

Commenter Organization:

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Ecosystem Restoration Standard	Question 3.9, pages 45-49.	Strong Safeguard System	Dear ICAO Technical Advisory Board Members, I am reaching out from Kita, a company dedicated to developing innovative carbon insurance solutions, to express our support for

			<p>the Ecosystem Restoration Standard (ERS) in its application for CORSIA accreditation.</p> <p>At the heart of our support is our admiration for ERS's comprehensive approach to risk assessment, specifically through its Risk Assessment Matrix (see page 70 of their application).</p> <p>The Risk Assessment Matrix rigorously analyses a multitude of potential project risks, totalling 124 risk categories. Each risk is evaluated on its likelihood and the severity of its consequences, ensuring a comprehensive and detailed risk assessment, which is instrumental for carbon insurers like us.</p> <p>As part of our collaboration with ERS, Kita is excited to work on building an innovative insurance mechanism to cover their buffer pool against default risk. This partnership underlines our shared commitment to supporting projects that are not only positively impacting carbon capture but also operationally secure over the long term.</p> <p>We believe that ERS's detailed and forward-thinking approach to risk assessment helps set a new standard for ecosystem restoration project certification.</p> <p>We believe ERS's methodologies to be well-aligned with the CORSIA program, and extend our full support for their application.</p>
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* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Name:

Sam Lampert

Organization:

Mirova

Date of receipt:

29 April 2024

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Commenter Name: Sam Lampert, Investment Director Mirova, samuel.lampert@mirova.com

Commenter Organization:

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
ERS - Ecosystem Restoration Standard	General support		Dear ICAO Representatives, I am writing on behalf of Mirova, a globally recognised asset manager committed to aligning its investment strategies with the objectives of the Paris Agreement. Our funds are classified as

			<p>Article 9 under SFDR regulations, and we have close to 30 billion euros in assets under management.</p> <p>We are pleased to extend our support for the Ecosystem Restoration Standard (ERS) in its application for CORSIA accreditation. Mirova actively participated in the ERS Public Consultation process, providing extensive and detailed feedback. We were impressed to see many of our suggestions thoughtfully integrated into the final standard, reflecting ERS's commitment to continuous improvement and stakeholder engagement.</p> <p>Our technical team has also conducted a thorough due diligence review of various carbon market standards, concluding that ERS stands out as one of the best options available today for assessing ecosystem restoration. ERS's rigorous approach and methodologies do not only align with, but often raise the bar on industry best practices.</p> <p>We believe that the CORSIA accreditation of ERS would be a significant step towards enhancing the quality and integrity of carbon market standards globally. We are confident that ERS's methodologies will contribute positively to the CORSIA programme.</p>

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Name:

Chris Sherwood

Organization:

Negative Emission
Platform

Date of receipt:

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Commenter Name: Chris Sherwood

Commenter Organization: Negative Emissions Platform

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Isometric	3.1. Clear methodologies and protocols, and their development process		Isometric has developed a strong reputation for the rigour of its protocol and is regarded in the CDR industry as one of the highest quality standards. The process Isometric has used for the development has been remarkable for its transparency and inclusivity.
Isometric	PART 4: Carbon Offset Credit Integrity Assessment Criteria		Isometric has addressed key aspects of the integrity assessment criteria in a particularly robust and scientific manner – notably additionality and permanence.

Isometric	Other / general		Isometric's model is winning plaudits from across the CDR community and seems likely to be highly influential as the sector develops.

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Name:

Michael Kelland and
Steve Rackley

Organization:

Planetary Technologies

Date of receipt:

26 April 2024

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Commenter Name: Michael Kelland

Commenter Organization: Planetary Technologies

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Isometric	3.1. Clear methodologies and protocols, and their development process		Isometric has effectively engaged the scientific community surrounding Ocean Alkalinity Enhancement to develop a clear, actionable and extremely rigorous protocol. The high standards used set a bar that ensures clear and accurate accounting for ocean based carbon removal using the best available science and taking into account uncertainties to conservatively deliver crediting that will stand the test of time even as the field evolves.

Isometric	PART 4: Carbon Offset Credit Integrity Assessment Criteria		Isometric’s protocols have explored every aspect of additionality and establish clear and scientifically valid baselines for the methodology that we have reviewed. In the context of Ocean Alkalinity Enhancement, this includes clear definition of project boundaries and includes all relevant GHG SSR’s. For our particular pathway it ensures that the production, transportation and use of feedstocks, the baseline of ocean CO2 flux, potential oceanic losses such as secondary precipitation and biotic calcification, and counterfactuals are fully included. Isometric’s approach of engaging with experts across protocol elements and the use of common modules within the protocols ensures that the best available science is used and is evolved in its own context. This brings the correct scientific expertise to each specific area and ensures that protocols do not become out of date or out of sync with each other.
Isometric	Other / general		

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Commenter Name: Steve Rackley

Commenter Organization: Planetary Technologies Inc

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Isometric	3.1. Clear methodologies and protocols, and their development process		<i>In addition to comments from Mike Kelland, Planetary; Isometric's OAE pathway specific protocol is supported by the overarching Isometric Standard and by the Alkalinity Characterization Module, ensuring that all technical, environmental, and social considerations that underpin credit integrity are addressed by project developers and independently verified.</i>
Isometric	PART 4: Carbon Offset Credit		

Name:

Dan Exton

Organization:

rePLANET

Date of receipt:

01 May 2024

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Commenter Name: Dr Dan Exton - Director of Strategy, RePLANET (dan.exton@replanet.org.uk)

Commenter Organization:

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Ecosystem Restoration Standard	Question 4.5, page 70-73.	Emission Units "Represent permanent emissions reductions"	Dear ICAO Representatives, I am writing to you on behalf of RePLANET, an organisation driving large-scale ecological restoration and protection through private sector funding. Our experience with various certification standards has led us to appreciate the quality and robustness of the Ecosystem Restoration

			<p>Standard (ERS), and we are eager to express our support for its application for CORSIA accreditation.</p> <p>Having submitted a project for ERS certification, we are keenly aware of the high standards it upholds. The ERS distinguishes itself as one of the most rigorous standards in the market, especially in terms of its safeguarding measures.</p> <p>Furthermore, our experience with the ERS team has been incredibly positive. So far, their efficiency has effectively cut our registration time in half compared to other standards, significantly accelerating our expected project's market launch. The fact this has been achieved in a way that doesn't sacrifice quality or robustness is very impressive, and represents a game changing advance for project developers like us.</p> <p>The accreditation of ERS by CORSIA would be a significant step forward for the carbon market. It would validate the high-quality standards set by ERS and encourage more project developers like us to engage in meaningful environmental restoration activities. It would also help to show the wider certification market what is possible with some innovative thinking and a willingness to strive for perfection – we are all aware of the urgent need to scale up the number of nature-based restoration projects globally, and solutions to the certification bottleneck is crucial to achieving that.</p> <p>We strongly advocate for the CORSIA accreditation of ERS, confident that it will enhance the integrity and efficacy of the carbon market.</p>
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Name:

Cedric Rimaud

Organization:

SMBC Group

Date of receipt:

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Commenter Name: Cedric Rimaud

Commenter Organization: SMBC Group

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Example: ABC Program	Example: Section 3.9	Example: Safeguards System (paragraph 2.9)	
Asia Carbon Institute	Part 1	Organisational Chart	ACI demonstrates high levels of oversight, with a Stakeholder Panel, an International Advisory Group, an International Experts Panel and a Vetting Committee.
Asia Carbon Institute	Part 2	Programme Summary	ACI proposes a credible alternative to international standards, being located in Singapore, in the heart of Asia, and being an

			independent, not-for-profit organization. Its objective is to support the regional carbon markets in Asia.
Asia Carbon Institute	Question 3.1	Methodologies	The ACI Program Manual provides a credible list of existing methodologies and a process for adapting existing methodologies for new projects. It also provides a clear process of revising existing methodologies and developing further methodologies.
Asia Carbon Institute	Question 3.2	Scope considerations	ACI accommodates projects across 16 different sectors, with a worldwide implementation and covers the greenhouse gases that are defined under IPCC's guidelines for national Greenhouse Gas inventories. As such, it is considered global and credible.
Asia Carbon Institute	Question 3.3	Offset credit issuance and retirement procedures	ACI has created 15 steps to issue offsets. In particular, we note that a consultation with relevant stakeholders is included, as well as the validation by an ACI accredited VVB, the review by an independent expert and the confirmation by ACI management before issuance. The adequate retirement and cancellation procedures are in place. In that, ACI's procedures are adequate.
Asia Carbon Institute	Question 3.4	Identification and Tracking	The outsourcing to EcoRegistry ensures that there is continuity and proper resources for the identification and tracking of the carbon offsets. The link with Climate Action Data Trust also ensures the proper safeguarding of information.
Asia Carbon Institute	Question 3.5	Legal nature and transfer of units	The criteria are sufficient.
Asia Carbon Institute	Question 3.6	Validation and verification procedures	Proper requirements and procedures are in place for the accreditation of VVBs.
Asia Carbon Institute	Question 3.7	Governance	ACI demonstrates high level of disclosure and transparency. All methodologies and project documents will be available publicly, allowing the scrutiny of external stakeholders, as well as the review by others looking to develop new methodologies.

Asia Carbon Institute	Question 3.8	Transparency and public participation	The information will be available for consultation through the ACI website and EcoRegistry. This shows a strong level of disclosure and transparency.
Asia Carbon Institute	Question 3.9	Safeguards system	The ACI methodologies will go through an E&S review.
Asia Carbon Institute	Question 3.11	Avoidance of Double Counting	ACI's checks appear adequate to prevent double counting. They include verifying project ownership, assigning unique serial numbers, and obtaining host country statements. The guidelines also set protocols for dealing with incidents of double counting, including temporary invalidation of disputed credits, stakeholder notification, and a three-tier penalty framework.
Asia Carbon Institute	Question 4.1	Additionality	ACI's methodologies follow best practice for additionality assessment. This is an important part of the process of crediting carbon offsets to any project.
Asia Carbon Institute	Question 4.2	Realistic and credible baseline	The use of the historical, hypothetical modelling and benchmarking approaches are credible to ensure a credible baseline, aligned with the CDM methodology.
Asia Carbon Institute	Question 4.4	Chain of custody	The use of blockchain technology is a credible solution to ensure the chain of custody of carbon offsets.
Asia Carbon Institute	Question 4.5	Permanence	The evaluation of the permanence of carbon offsets is adequately documented and credible.
Asia Carbon Institute	Question 4.6	Leakage	The requirement by the VVB to review the risk of leakage is included and appears to be sufficient.
Asia Carbon Institute	Question 4.7	Only counted once	Both ACI and the VVB have an obligation to document that the carbon offsets are only counted once. The procedures in place are sufficient to avoid double counting.
Asia Carbon Institute	Question 4.8	No net harm	The compliance with local regulations is included at a minimum, but an E&S assessment must also be conducted to ensure that any negative impacts are minimized.

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)

Name:

Ben Rattenbury

Organization:

Sylvera

Date of receipt:

10 May 2024

TAB Public Comment Template Form

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Commenter Name: Ben Rattenbury, VP Policy, Sylvera, ben@sylvera.io

Commenter Organization:

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
Ecosystem Restoration Standard (ERS)	Question 3.7, page 37	Programme governance	Dear ICAO Representatives, I am writing to you on behalf of Sylvera, a leader in providing advanced data analytics and project ranking to help businesses and governments navigate carbon markets effectively.

			<p>In our extensive analysis, we have found that only a small fraction of the ARR projects assessed achieve an 'A' or higher rating on our scale. This finding highlights a critical need for more rigorous standards and methodologies to uplift the integrity of ARR projects on the carbon market.</p> <p>One of the things that sets ERS apart, and why we advocate for its accreditation, is its innovative business model. By charging fees per hectare per year, ERS effectively eliminates any potential conflicts of interest. This approach significantly improves the integrity of the certification process, curbing the overestimation of carbon credit issuances, a challenge commonly faced in this sector.</p> <p>Second, ERS has developed a rigorous and consistent standard for estimation of carbon stocks using Earth observation, to minimise potential bias in the estimation of these stocks (and thus sequestration potentials). This again reduces the likelihood, arising from the inherent interest of developers, in overstating permitted credit issuance.</p> <p>We believe that integrating ERS standards into the carbon market, particularly under the CORSIA framework, could markedly enhance the overall credibility and reliability of ARR projects. ERS's meticulous and transparent methodologies align with our vision of a more accountable and effective carbon market.</p>

Name:

Sven Kolmetz

Organization:

Project Developer

Forum

Date of receipt:

6 June 2024

6 June 2024

TAB@icao.int

Subject: Conditional approval to VERRA, Gold Standard and CAR for CORSIA Phase 1

To whom it may concern,

We welcome ICAO providing for a public consultation period on the material updates submitted by programmes for 2024. This letter is being sent in parallel to the Public Comments Form.

This letter is a follow up on the letter submitted to ICAO on [15th] April 2024, for which the PD Forum has not received a response.

We reiterate our concerns expressed in our letter of [15th] April 2024 regarding ICAO's requirement for project developers to bear the financial and policy risk of reversal. This is for the two main reasons below:

1) It undermines host country governments

Concerns of revocation risk undermine the capacity of host parties to comply with the Article 6 processes. We believe that host governments should be actively engaged and should participate in the decision-making process of how host country revocations are dealt with. As a network of Project Developers working across the Global South, we find host country governments to be committed to the Article 6 process. While there remain some capacity gaps, the progress towards Article 6 operationalisation in many countries, including developing countries and LDCs, has been positive and should be applauded. Members of the PD Forum have already started to receive Letters of Authorisation from countries and carbon regulations are progressing at an admirable rate. We firmly believe that with full operationalisation of the 6.2 and 6.4 mechanisms under the UNFCCC, host country governments have the capacity to authorise and thus, correspondingly adjust emission reductions and/or removals.

2) It places undue liability on project developers, which may stifle investment and project development

Many carbon project developers in developing nations are small, with tight margins, operating at an entirely different scale to an international airline, the United Nations and host national governments. Enforcing liability for revocation on project developers will impose a high burden of risk and is likely to stifle investment in much-needed carbon projects. This will be disproportionately true in Least Developed Countries which might be perceived as highest "risk" by the global insurance markets, but are most in need of carbon investment for sustainable development.

We believe it is the duty of the host country to submit its GHG inventory and periodically update the status of achievement of its targets under the NDC. In all these situations, we see that it is ultimately the responsibility of the host country to appropriately and adequately record the inventory of its GHG emissions, and to correspondingly adjust the reductions that were authorised for use by other countries/parties.

In a situation where host parties do not follow the rules under the Paris Agreement, the United Nations, via ICAO and UNFCCC, should be responsible for enforcement given their status and responsibility on the global stage. We would hope to see the United Nations take on greater accountability to ensure that host parties carry through all adjustments within the timelines as laid out by UNFCCC. This approach will ensure that airline offsetting investments are adequately secured.

Given ICAO is a UN body, we are surprised that ICAO is undermining the processes and policies developed by its fellow UN bodies through the UNFCCC and COP.

Working together to bring CORSIA eligible credits to the market

In the long term we hope to constructively engage with ICAO and the UNFCCC to develop a supra-national method of enforcing Article 6 which is more suitable than reliance on small private companies.

In the short term, however, we acknowledge that ICAO is firm with its position on the risk being borne by project developers. We believe that the material updates submitted by Verra and Gold Standard, the two largest registries, meet the demands of ICAO and they should be approved swiftly. We therefore want to constructively engage with ICAO in supplying ICAO's member states and airlines with CORSIA eligible credits at the earliest opportunity.

Accordingly, we call for ICAO and the TAB to schedule a meeting at the earliest opportunity to approve the conditionally approved registries, rather than delay approval to Q4 2024. As ICAO gave the registries less than 6 weeks to respond, we would hope that ICAO can work to a similar timeline and approve in short order, rather than wait for 5/6 months. Such delay serves no purpose, besides extending uncertainty and confusion for airlines and project developers alike. ICAO's lengthy consultation processes threaten to undermine the potential of CORSIA and create substantial financial and policy uncertainty for airlines.

Furthermore, we encourage ICAO to engage with the registries and project developers on an ongoing basis in case of any concerns or issues with the material updates from the registries.

The PD Forum is open to collaboration and engagement with ICAO and looks forward to playing a role in CORSIA as the offsetting scheme moves from a voluntary programme to a mandatory programme.

Your sincerely,

Dr. Sven Kolmetz (on behalf of the members of PD Forum)

- ✓ Will be available on pd-forum.net
- ✓ Will be available to the press



Name:

Rory McDougall

Organization:

DelAgua Group
Limited

Date of receipt:

4 June 2024

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Commenter Name: Rory McDougall

Commenter Organization: DelAgua Group Limited

Programme Name	Reference in Programme Application Form	Emissions Unit Criteria reference*	Comment
VCS	CORSIA Label Guidance v1.0	N/A	We encourage ICAO to publish this guidance document now to allow for Project Developers to prepare for CORSIA labelling before full approval of VCS.
VCS	Change 3	Avoidance of Double Counting, Issuance and Claiming	We encourage ICAO to engage with the registries and project developers on an ongoing basis, rather than limit interaction to formal documents and public consultation periods. VCS is asking for dialogue with ICAO and ICAO should engage accordingly.

VCS	Change 3	Avoidance of Double Counting, Issuance and Claiming	It is unclear from the submission at what point the CORSIA Accounting Representation will be required. Corresponding adjustment insurance will likely be linked to serial IDs and the price payable for the credit, which is generated upon transfer to a third party by the developer. As a result, such a Representation will most likely only be possible after a sale/transfer of credits, not beforehand; this practical/administrative timing gap should be acceptable to all parties.
VCS	Change 3	Avoidance of Double Counting, Issuance and Claiming	Any claim made by an airline/end-user under the certificate of insurance should be capped at the price received by the project developer. If the project developer sells a CORSIA credit to a third party at \$10 with that third party then selling that same credit to an airline at [\$15], the project developer's liability should be limited to \$10, unless that third party has taken additional insurance out cover the \$5 differential. The project developer has received no financial benefit for that markup and accordingly should not be expected to cover any losses in relation to it.

* Please refer to [Programme Application Form, Appendix A - Supplementary Information for Assessment of Emissions Unit Programs](#)