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

Application Form for Emissions Units Programs

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SECTION I: ABOUT THIS ASSESSMENT

Background

Following the agreement at the 39th Assembly of the International Civil Aviation Organization (ICAO), governments and the aviation industry are getting ready to implement the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). Together with other mitigation measures, CORSIA will help achieve international aviation’s aspirational goal of carbon neutral growth from year 2020.

Aeroplane Operators will meet their offsetting requirements under CORSIA by purchasing and cancelling CORSIA eligible emissions units, which will be determined by the ICAO Council upon recommendations by its Technical Advisory Body (TAB), according to paragraph 20 d) of ICAO Assembly Resolution A39-3.

As an initial step, in November 2017, the ICAO Council provisionally approved CORSIA Emissions Unit Eligibility Criteria (EUC). Application of the EUC will serve as the basis for the Council’s decisions on CORSIA-eligible emissions units.

To make further progress on the application of the EUC, the ICAO Council requested its Committee on Aviation Environmental Protection (CAEP) to formally test emissions unit programs against the EUC. The results and recommendations of the informal testing were provided to the Council, including the recommendation for the EUC to be used by the TAB in this assessment process.

Subsequently, in March 2019, the ICAO Council unanimously approved the EUC for use by the TAB in undertaking its tasks. At the same time, the ICAO Council also approved the 19 members of the TAB and its Terms of Reference (TOR).

ICAO has invited emissions unit programs to apply for the assessment, which will involve collecting information from each program through this program application form.

Through this assessment, the TAB will develop recommendations on the list of eligible emissions unit programs (and potentially project types) for use under the CORSIA, which will then be considered by the ICAO Council to make its decision on CORSIA eligible emissions units.

This form is accompanied by Appendix A “Supplementary Information for Assessment of Emissions Unit Programs”, containing the EUC and Guidelines for Criteria Interpretation. These EUC and Guidelines are provided to inform programs’ completion of this application form, in which they are cross-referenced by paragraph number.

Program responses to this application form will serve as the primary basis for the assessment. Such assessment may involve e.g. clarification questions, an in-person interview, and a completeness check of the application, as further requested. Programs which are invited for an in-person interview will receive advance notice of the time and date of the interview.

The working language of the assessment process is English. If the program documents and information are not published in English, the program should fully describe in English (rather than summarize) this information in the fields provided in this form, and in response to any additional questions. Translation services are not available for this process. Those programs that need to translate documents prior to submission may contact the ICAO Secretariat regarding accommodation.
Disclaimer: The information contained in the application, and any supporting evidence or clarification provided by the applicant including information designated as “business confidential” by the applicant, will be provided to the members of the TAB to properly assess the Program and make recommendations to the ICAO Council. The application and such other evidence or clarification will be made publicly available on the ICAO CORSIA website for the public to provide comments, except for information which the applicant designates as “business confidential”. The applicant shall bear all expenses related to the collection of information for the preparation of the application, preparation and submission of the application to the ICAO Secretariat and provision of any subsequent clarification sought by the Secretariat and/or the members of the TAB. Under no circumstances shall ICAO be responsible for the reimbursement of such or any other expenses borne by the applicant in this regard, or any loss or damages that the applicant may incur in relation to the assessment and outcome of this process.
SECTION II: INSTRUCTIONS

Submission and contacts

A Program is invited to complete and submit the form, and any accompanying evidence, through the ICAO CORSIA website no later than close of business on 12 July 2019. Within seven business days of receiving this form, the Secretariat will notify the Program that its form was received.

If the Program has questions regarding the completion of this form, please contact ICAO Secretariat via email: officeenv@icao.int. Programs will be informed, in a timely manner, of clarifications provided by ICAO to any other program.

Form basis and cross-references

Questions in this form are derived from the criteria and guidelines introduced in Section I (above). To help inform the Program’s completion of this form, each question includes the paragraph number for its corresponding criterion or guideline that can be found in Appendix A “Supplementary Information for Assessment of Emissions Unit Programs”.

Form completeness

The Program is strongly encouraged to respond to all questions in this application form. If any question(s) in this form does not apply to the Program, please briefly explain the exception.

Where “evidence” is requested, programs are encouraged to substantiate their responses in any one of these ways (in order of preference):

- web-links to supporting documentation included along with the written summary response; with instructions for finding the relevant information within the linked source, if necessary;
- copying/pasting information directly into this form (no character limits) along with the written summary response;
- attaching supporting documentation to this form at the time of submission, with instructions for finding the relevant information within the attached document(s);

Please note that written summary responses are encouraged—supporting documentation should not be considered as an alternative.

To help manage file size, the Programs should limit supporting documentation to that which directly substantiates the Program’s statements in this form.

Form scope

The Program may elect to submit for analysis all or only a portion of the activities supported by the Program.

In the template provided by Appendix B “Program Scope Information Request”, the Program should clearly identify and submit along with this form information on the following:

a) activities that the Program submits for analysis by describing them in this form;

b) activities that the Program does not wish to submit for analysis, and so are not described in this form;
c) identification details (e.g., methodology date, version) for activities described in this form.

Information provided under “c” should allow for the unambiguous identification of all methodologies/protocols that the Program has approved for use as of the date of submission of this form.

**Program revision**

Where the Program has any immediate plans to revise the Program (e.g., its policies, procedures, measures) to enhance consistency with a given criterion or guideline, provide the following information in response to the relevant form question(s):

- Proposed revision(s);
- Process and proposed timeline to develop and implement the proposed revision(s);
- Process and timeline for external communication and implementation of the revision(s).

**“Linked” certification schemes**

This application form should be completed and submitted exclusively on behalf of the Program that was invited to participate in the assessment.

Some programs may supplement their standards by collaborating with other schemes that certify, e.g., the social or ecological “co-benefits” of mitigation. The Program can reflect a linked scheme’s procedures in responses to this form, where this is seen as enhancing—i.e. going “above and beyond”—the Program’s own procedures.

For example, the Program may describe how a linked scheme audits sustainable development outcomes; but is not expected to report the linked scheme’s board members or staff persons.

Programs should clearly identify any information provided in this form that pertains to a linked certification scheme and/or only applies when a linked certification scheme is used.

**Disclosure of program application forms**

Applications and other information submitted by emissions unit programs will be publicly available on the ICAO CORSIA website, except for materials which the applicants designate as business confidential.

The public will be invited to submit comments on the programs applications including regarding their consistency with the emissions units criteria (EUC), through the ICAO CORSIA website, for consideration by the TAB following its initial assessment of program applications.
## SECTION III: APPLICATION FORM

### PART 1: General information

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<thead>
<tr>
<th>A. Program Information</th>
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<td>Program name:</td>
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<tr>
<td>Official mailing address:</td>
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<td>Telephone #:</td>
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<tr>
<td>Official web address:</td>
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<th>B. Program Administrator Information</th>
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<td>Full name and title:</td>
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<td>Employer / Company (if not Program):</td>
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<td>E-mail address:</td>
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<td>Telephone #:</td>
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<th>C. Program Representative Information (if different from Program Administrator)</th>
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<td>Full name and title:</td>
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<td>Employer / Company (if not Program):</td>
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<td>E-mail address:</td>
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<td>Telephone #:</td>
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<th>D. Program Senior Staff / Leadership (e.g., President / CEO, board members)</th>
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<tbody>
<tr>
<td>List the names and titles of Program’s senior staff / leadership, including board members:</td>
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</table>
PART 2: Program summary

Provide a summary description of your program
PART 3: Emissions Unit Program Design Elements

Note—where “evidence” is requested in Part 3 and Part 4, the Program should provide web links to documentation. If that is not possible, then the program may provide responses in the text boxes provided and/or attached supporting documentation, as recommended in “SECTION II: INSTRUCTIONS—Form Completeness”.

Note—“Paragraph X.X” in this form refers to corresponding paragraph(s) in Appendix A “Supplementary Information for Assessment of Emissions Unit Programs”.

Note—Where the Program has any immediate plans to revise the Program (e.g., its policies, procedures, measures) to enhance consistency with a given criterion or guideline, provide the following information in response to the relevant form question(s):

- Proposed revision(s);
- Process and proposed timeline to develop and implement the proposed revision(s);
- Process and timeline for external communication and implementation of the revision(s).

3.1. Clear methodologies and protocols, and their development process

Summarize the Program’s processes for developing and approving methodologies, including the timing and process for revision of existing methodologies:

Provide evidence of the public availability of a) the Program’s current processes for developing methodologies and protocols and b) the methodologies / protocols themselves: (Paragraph 2.1)

3.2. Scope considerations

SECTION II: Application Form Scope includes questions related to this criterion. No additional information is requested here.

3.3. Offset credit issuance and retirement procedures

Are procedures in place… (Paragraph 2.3)

a) for unit issuance and retirement / cancellation? □ YES

b) related to the duration and renewal of crediting periods? □ YES

c) for unit discounting (if any)? □ YES

Provide evidence of the relevant policies and procedures related to a) through c) (if any, in the case of “c”), including their availability to the public:

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1 For this and subsequent “evidence” requests, evidence should be provided in the text box (e.g., web links to documentation), and/or in attachments, as recommended in “SECTION II: INSTRUCTIONS—Form Completeness”.

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3.4 Identification and Tracking

Does the Program utilize an electronic registry or registries? (Paragraph 2.4.2) □ YES

Provide web link(s) to the Program registry(ies) and indicate whether the registry is administered by the Program or outsourced to a third party (Paragraph 2.4 (e)):

Do / does the Program registry / registries…:

a) have the capability to designate the ICAO eligibility status of particular units? (Paragraph 2.4.3) □ YES

b) identify and facilitate tracking and transfer of unit ownership/holding from issuance to cancellation/retirement? (Paragraphs 2.4 (d) and 2.4.4) □ YES

c) identify unit status, including retirement / cancellation, and issuance status? (Paragraph 2.4.4) □ YES

d) assign unique serial numbers to issued units? (Paragraphs 2.4 (b) and 2.4.5) □ YES

e) identify in serialization, or designate on a public platform, each unique unit’s country and sector of origin, and vintage year? (Paragraph 2.4.5) □ YES

Summarize and provide evidence of the relevant policies and procedures related to a) through e), including their availability to the public:

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

Are policies in place to prevent the Program registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services? (Paragraph 2.4.6) □ YES

To address and isolate such conflicts, should they arise? (Paragraph 2.4.6) □ YES

Summarize and provide evidence of the relevant policies and procedures, including their availability to the public:

Are provisions in place…

a) ensuring the screening of requests for registry accounts? (Paragraph 2.4.7) □ YES

b) restricting the Program registry (or registries) accounts to registered businesses and individuals? (Paragraph 2.4.7) □ YES

c) ensuring the periodic audit or evaluation of registry compliance with security provisions? (Paragraph 2.4.8) □ YES
Summarize registry security provisions, including related to a) through c); and provide evidence of the relevant policies and procedures, including their availability to the public:
### 3.5 Legal nature and transfer of units

Does the Program define and ensure the underlying attributes and property aspects of a unit? *(Paragraph 2.5)*

☐ YES

Summarize and provide evidence of the relevant policies and procedures, including their availability to the public:

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### 3.6 Validation and verification procedures

Are standards and procedures in place for… *(Paragraph 2.6)*

- a) validation and verification processes?  ☐ YES
- b) validator and verifier accreditation?  ☐ YES

Provide evidence of the relevant policies and procedures related to a) and b), including their availability to the public:

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### 3.7 Program governance

Does the Program publicly disclose who is responsible for the administration of the Program, and how decisions are made? *(Paragraph 2.7)*

☐ YES

Provide evidence that this information is available to the public:

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<th>Evidence</th>
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Can the Program demonstrate that it has… *(Paragraph 2.7.2)*

- a) been continuously governed and operational for at least the last two years?  ☐ YES
- b) a plan for the long-term administration of multi-decadal program elements which includes possible responses to the dissolution of the Program in its current form?  ☐ YES

Provide evidence of the relevant policies and procedures related to a) and b):

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<th>Evidence</th>
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Are policies in place to prevent the Program staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of program services? *(Paragraph 2.7.3)*

☐ YES

To address and isolate such conflicts, should they arise? *(Paragraph 2.7.3)*  ☐ YES
Summarize and provide evidence of the relevant policies and procedures:

If applicable, can the Program demonstrate up-to-date professional liability insurance policy of at least USD$5M? *(Paragraph 2.7.4)*

Provide evidence of such coverage:

3.8 Transparency and public participation provisions

Does the Program publicly disclose… *(Paragraph 2.6)*

a) what information is captured and made available to different stakeholders? □ YES

b) its local stakeholder consultation requirements (if applicable)? □ YES

c) its public comments provisions and requirements, and how they are considered (if applicable)? □ YES

Provide evidence of the public availability of items a) through c):

Does the Program conduct public comment periods? □ YES

Provide evidence of the relevant policies and procedures:

3.9 Safeguards system

Are safeguards in place to address environmental and social risks? *(Paragraph 2.9)* □ YES

Summarize and provide evidence of the relevant policies and procedures, including their availability to the public:
3.10 Sustainable development criteria

Does the Program publicly disclose sustainable development criteria used (if any), and provisions for monitoring, reporting and verification in accordance with these criteria? (Paragraph 2.10)

Provide evidence of the public availability of any relevant policies and procedures:

☐ YES

3.11 Avoidance of double counting, issuance and claiming

SECTION III, Part 4.7—Are only counted once towards a mitigation obligation includes questions related to this criterion. No additional information is requested here.
PART 4: Carbon Offset Credit Integrity Assessment Criteria

*Note*—Where the Program has any immediate plans to revise the Program (e.g., its policies, procedures, measures) to enhance consistency with a given criterion or guideline, provide the following information in response to the relevant form question(s):

- Proposed revision(s);
- Process and proposed timeline to develop and implement the proposed revision(s);
- Process and timeline for external communication and implementation of the revision(s).

### 4.1 Are additional

What is the threshold for over-issuance risk beyond which the Program provisions or measures require a response? *(Quantify if possible)*

<table>
<thead>
<tr>
<th>Is additionality and baseline-setting assessed by an accredited and independent third-party verification entity, and reviewed by the Program? <em>(Paragraph 3.1)</em></th>
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<tr>
<td>□ YES</td>
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</table>

Summarize and provide evidence of the relevant policies and procedures, including their availability to the public:

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<tr>
<th>Does the Program utilize one or more of the methods cited in Paragraph 3.1.2, which can be applied at the project- and/or program-level? <em>(Paragraphs 3.1.2 - 3.1.3)</em></th>
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<tr>
<td>□ YES</td>
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Summarize and provide evidence of the relevant policies and procedures, including listing and describing any/all analysis / test types that the Program permits for use:

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<th>If the Program designates certain activities as automatically additional (e.g., through a “positive list” of eligible project types), does the Program provide clear evidence on how the activity was determined to be additional? <em>(Paragraph 3.1)</em></th>
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<tr>
<td>□ YES</td>
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Summarize and provide evidence of the availability to the public of relevant policies and procedures, including the criteria used to determine additionality:

<table>
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<th>Describe how the procedures described in this section provide a reasonable assurance that the mitigation would not have occurred in the absence of the offset program? <em>(Paragraph 3.1)</em></th>
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### 4.2 Are based on a realistic and credible baseline

Are procedures in place to issue emissions units against realistic, defensible, and conservative baseline estimations of emissions? *(Paragraph 3.2)* □ YES

Summarize and provide evidence of the relevant policies and procedures, including that baselines and underlying assumptions are publicly disclosed:

Are procedures in place to ensure that methods of developing baselines, including modelling, benchmarking or the use of historical data, use assumptions, methodologies, and values do not over-estimate mitigation from an activity? *(Paragraph 3.2.2)* □ YES

Summarize and provide evidence of the relevant policies and procedures:

Are procedures in place for activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration? *(Paragraph 3.2.3)* □ YES

Summarize and provide evidence of the relevant policies and procedures:

### 4.3 Are quantified, monitored, reported, and verified

Are procedures in place to ensure that…

a) emissions units are based on accurate measurements and valid quantification methods/protocols? *(Paragraph 3.3)* □ YES

b) validation occurs prior to or in tandem with verification? *(Paragraph 3.3.2)* □ YES

c) results of validation and verification are made publicly available? *(Paragraph 3.3.2)* □ YES

d) monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at specified intervals throughout the duration of the crediting period? *(Paragraph 3.3)* □ YES

e) mitigation is measured and verified by an accredited and independent third-party verification entity? *(Paragraph 3.3)* □ YES

f) *ex-post* verification of mitigation is required in advance of issuance of emissions units? *(Paragraph 3.3)* □ YES

Summarize and provide evidence of the relevant policies and procedures related to a) through f):
Are provisions in place… (Paragraph 3.3.3)

a) to manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures, and the Program and the activities it supports? □ YES

b) requiring accredited third-party(ies) to disclose any conflict of interest? □ YES c)

to address and isolate such conflicts, should they arise? □ YES

Summarize and provide evidence of the relevant policies and procedures:

Are procedures in place requiring that renewal of any activity at the end of its crediting period includes a reevaluation and update of baseline? (Paragraph 3.3.4)

Summarize and provide evidence of the relevant policies and procedures:

Are procedures in place to transparently identify units that are issued ex-ante and thus ineligible for use in the CORSIA? (Paragraph 3.3.5)

Provide evidence of the relevant policies and procedures:

4.4 Have a clear and transparent chain of custody

SECTION III, Part 3.4—Identification and tracking includes questions related to this criterion. No additional information is requested here.

4.5 Represent permanent emissions reductions

List any emissions sectors (if possible, activity types) supported by the Program that present a potential risk of reversal of emissions reductions, avoidance, or carbon sequestration:

What is the minimum scale of reversal for which the Program provisions or measures require a response? (Quantify if possible)
For sectors/activity types identified in the first question in this section, are procedures / provisions in place to require and support these activities to…

a) undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals? (Paragraph 3.5.2) □ YES

b) monitor identified risks of reversals? (Paragraph 3.5.3) □ YES
c) mitigate identified risks of reversals? (Paragraph 3.5.3) □ YES
d) ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA? (Paragraph 3.5.4)

Summarize and provide evidence of the relevant policies and procedures related to a) through d):

Are provisions in place that… (Paragraph 3.5.5)

a) confer liability on the activity proponent to monitor, mitigate, and respond to reversals in a manner mandated in the Program procedures? □ YES

b) require activity proponents, upon being made aware of a material reversal event, to notify the Program within a specified number of days? □ YES
c) confer responsibility to the Program to, upon such notification, ensure and confirm that such reversals are fully compensated in a manner mandated in the Program procedures? □ YES

Summarize and provide evidence of the relevant policies and procedures related to a) through c):

Does the Program have the capability to ensure that any emissions units which compensate for the material reversal of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA are fully eligible for use under the CORSIA? (Paragraph 3.5.6)

Summarize and provide evidence of the relevant policies and procedures:

Would the Program be willing and able, upon request, to demonstrate that its permanence provisions can fully compensate for the reversal of mitigation issued as emissions units and used under the CORSIA? (Paragraph 3.5.7) □ YES

4.6 Assess and mitigate against potential increase in emissions elsewhere

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

Are measures in place to assess and mitigate incidences of material leakage of emissions that may result from the implementation of an offset project or program? (Paragraph 3.6)
ze and provide evidence of the relevant policies and procedures: □ YES
Are provisions in place requiring activities that pose a risk of leakage when implemented at the project-level to be implemented at a national level, or on an interim basis on a subnational level, in order to mitigate the risk of leakage? (Paragraph 3.6.2) ☐ YES

Summarize and provide evidence of the relevant policies and procedures:

Are procedures in place requiring activities to monitor identified leakage? (Paragraph 3.6.3) ☐ YES

Summarize and provide evidence of the relevant policies and procedures:

Are procedures in place requiring activities to deduct from their accounting emissions from any identified leakage that reduces the mitigation benefits of the activities? (Paragraph 3.6.4) ☐ YES

Summarize and provide evidence of the relevant policies and procedures:

4.7 Are only counted once towards a mitigation obligation

Are measures in place to avoid the following, as defined in the corresponding Paragraphs, particularly with respect to registry-related protocols and/or oversight?

a) double-issuance? (Paragraphs 3.7.1 and 3.7.5) ☐ YES

b) double-use? (Paragraphs 3.7.2 and 3.7.6) ☐ YES

c) double-selling? (Paragraph 3.7.7) ☐ YES

Summarize and provide evidence of the relevant policies and procedures related to a) through c):

Are measures in place (or would the Program be willing and able to put in place measures) to avoid double-claiming as defined in Paragraph 3.7.3? ☐ YES

As resolved as in Paragraphs 3.7.8 – 3.7.9? ☐ YES

Summarize and provide evidence of any relevant policies and procedures:

If no measures are currently in place, describe what measures the Program would consider putting in place in relation to the guidelines in Paragraphs 3.7.3 and Paragraphs 3.7.8 – 3.7.9:
Are measures in place (or would the Program be willing and able to put in place measures) to…

a) make publicly available any national government decisions related to accounting for the underlying mitigation associated with units used in ICAO, including the contents of host country attestations described in the criterion guidelines (Paragraph 3.7.10)  □ YES

b) update information pertaining to host country attestation as often as necessary to avoid double-claiming? (Paragraph 3.7.10)  □ YES

c) monitor for double-claiming by relevant government agency(ies) that otherwise attested to their intention to not double-claim the mitigation? (Paragraph 3.7.11)  □ YES

d) report to ICAO’s relevant bodies, as requested, performance information related to, *inter alia,* any material instances of and Program responses to country-level double-claiming; the nature of, and any changes to, the number, scale, and/or scope of host country attestations; any relevant changes to related Program measures? (Paragraph 3.7.12)  □ YES

e) 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? (Paragraph 3.7.13)  □ YES

Summarize and provide evidence of any relevant policies and procedures related to a) through e):

If no measures are currently in place, describe what measures the Program would consider putting in place in relation to the guidelines in Paragraphs 3.7.10 – 3.7.13:

4.8 Do no net harm

Are procedures in place to ensure that offset projects do not violate local, state/provincial, national or international regulations or obligations? (Paragraph 3.8)  □ YES

Summarize and provide evidence of the relevant policies and procedures:

Provide evidence that the Program complies with social and environmental safeguards: (Paragraph 3.8)

Provide evidence of the Program’s public disclosure of the institutions, processes, and procedures that are used to implement, monitor, and enforce safeguards to identify, assess and manage environmental and social risks: (Paragraph 3.8)
PART 5: Program comments

Are there any additional comments the Program wishes to make to support the information provided in this form?
SECTION IV: SIGNATURE

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

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

As the Program Representative, I acknowledge that:

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

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

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

Signed:

________________________________________________________________________

Full name of Program Representative (Print) Date signed (Print)

________________________________________________________________________

Program Representative (Signature)

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