INTERNATIONAL CARBON REGISTRY

Review #3

Version 1.0

SUMMARY

The following document outlines an assessment (Review #3) of whether the International Carbon Registry (ICR) meets ICROA's Carbon Crediting Programme Endorsement Review Criteria (version 3.1). The review was carried out between 1 December 2024 and 21January 2025, and is based on the documents submitted to ICROA by ICR on 22 November 2024, as well as responses to clarification questions received on the 15 and 19 January 2025.

Review #2 was carried out between 15 August and 13 September 2024, and was based on the documents submitted to ICROA by ICR on 26 July 2024. Clarifications on several questions were provided on 4 September 2024. The results of this review can be found in Annex 1.

Review #1 was carried out between 6 March and 23 April 2024, and was based on the documents submitted to ICROA by ICR on 26 February 2024. The results of this review can be found in Annex 2.

The outcome of Review #3 is that ICR meets ICROA's endorsement criteria. However, ICR has undergone significant updates in the second half of 2024, affecting, among others local stakeholder consultation procedures, and environmental and social risk assessment. This means that the projects certified before these updates were made will not meet ICROA's endorsement criteria. Any projects seeking certification from 15 October 2024 will need to apply the new requirements.

Requirement	Outcome	Explanation
1) Independence	🟢	ICR requires all VVBs to have an impartiality policy and procedures to manage impartiality in place. In its 3rd application, ICR further strengthened this by issuing new agreements for VVBs to sign that stipulate the requirements for impartiality of their assessment.
2) Governance	🟢	*Not reassessed (criteria fulfilled in Review #2)*. However, the requirements for methodology development have been strengthened to stipulate that experts should be involved in methodology development. In addition, methodologies and associated tools will be reviewed at least every 5 years.
4) Validation and verification	🟢	*Not reassessed (criteria fulfilled in Review #1 and Review #2)*
5) Carbon Crediting Principles	🟢	Real: ICR issues ex-ante credits, although these cannot be retired until after they are verified ex-post. The registry distinguishes between inactive (ex-ante) and active (ex-post) credits. ICRs 3rd application clarified that only ex-post credits are eligible to compensate for non-performance events. Permanent: to determine the contribution to a buffer adjustment account, ICR allows project risk assessments to be conducted by a third party. To mitigate any identified risks, proponents are now specifically required to implement mitigation actions. In

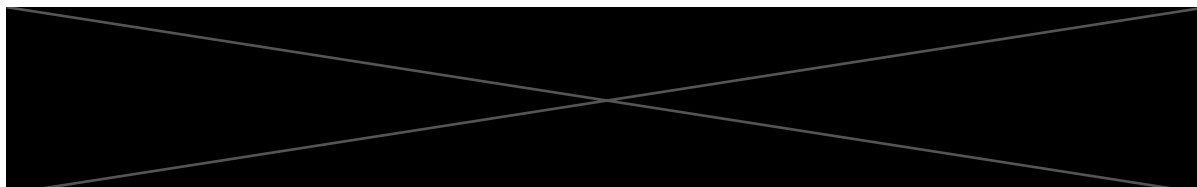| Requirement	Outcome	Explanation
		addition, any reversal events must be compensated for in credits (rather than cash).
		Additional: In ICR's 3rd application, the programme clarified that it does not pre-define certain project types as automatically additional.
		Measurable: the methodologies developed under ICR are reviewed by a VVB, and undergo public consultation. The most recent version of program documentation requires methodologies to be based on peer-reviewed and scientifically proven methods. ICR also allows methodologies from GHG programs endorsed by ICROA, CORSIA or ICVCM.
6) Environmental and social impacts	🟡	In its 3rd application, ICR has updated program documents to require projects to identify and mitigate all environmental and social risks with the ICR Tool for assessment of Environmental and Socio-economic Safeguards (ICR ESS Tool), which is based on the CDM' Sustainable Development co-benefits tool. However, as it is only recently published, the updated risk assessment procedure has not yet been applied by projects. The review team are therefore unable to assess evidence that these new procedures are being followed, which is the reason to award an orange outcome.
		However, any projects seeking certification from 15 October 2024 will need to apply the new requirements.
7) Stakeholder considerations	🟡	Program level consultation: *Not reassessed (sub criteria fulfilled in Review #2)*
		Project level consultation: Project-level stakeholder consultations are required, and a procedure for how these should be conducted is defined. However, since this is a new requirement ICR's currently certified projects have not conducted project-level stakeholder consultations. The review team are therefore unable to assess evidence that these new procedures are being followed, which is the reason to award an orange outcome.
		However, any projects seeking certification from 15 October 2024 will need to apply the new requirements.
8) Scale	🟢	*Not reassessed (criteria fulfilled in Review #1)*
9) Additional considerations	🟢	*Not reassessed (criteria fulfilled in Review #1)*

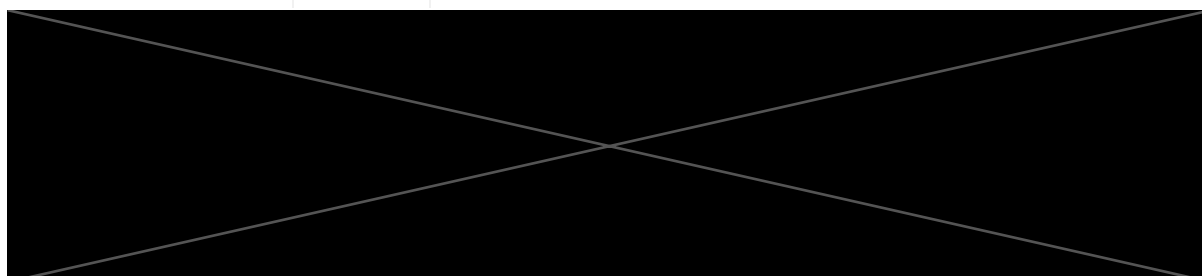# INTERNATIONAL CARBON REGISTRY

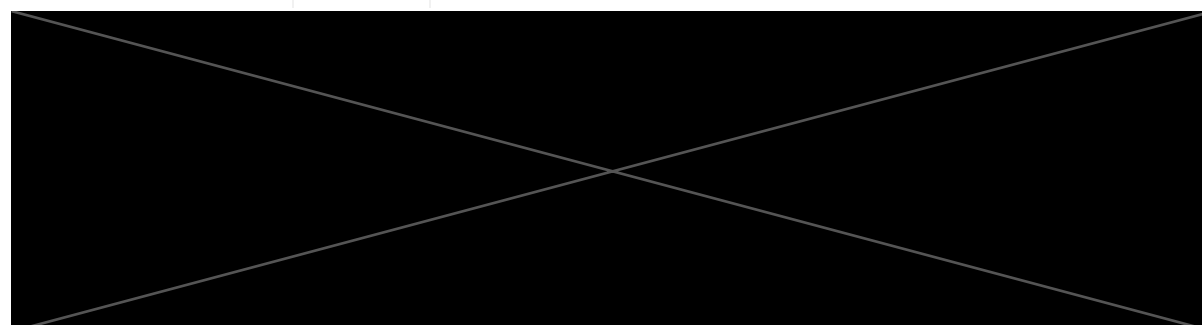Review #2

Version 1.0

CLIMATE
FOCUS

SUMMARY

The following document outlines an assessment (Review #2) of whether the International Carbon Registry meets ICROA's Carbon Crediting Programme Endorsement Review Criteria (version 3.1). The assessment was carried out between August 15 and September 13, and is based on the documents submitted to ICROA by the International Carbon Registry on July 26. Clarifications on several questions were provided on September 4.

Requirement	Outcome	Explanation
1) Independence	🟢	ICR requires all VVBs to have an impartiality policy and procedures to manage impartiality in place. ICR does not require VVBs to sign a COI policy, stating that the accreditation principles as outlined in ISO 14065 should be sufficient. However, a statement on impartiality has been added to the ICR VVB Agreement, althogh this does not evidence that the Programme does not have a COI with VVBs.
4) Validation and verification	🟢	ICR has extended their VVB oversight procedures, and has included a rule on the maximum number of sequential verifications by a single 'verification team': "The verification team members shall not be involved in more than five consecutive verifications or up to five years monitoring whichever comes first".

INTERNATIONAL CARBON REGISTRY

Review #1

15 May 2024

Version 1.1

CLIMATE FOCUS

SUMMARY

The following document outlines an assessment of whether the International Carbon Registry meets ICROA's Carbon Crediting Programme Endorsement Review Criteria (version 3.1). The assessment was carried out between March 6 and April 23, and is based on the documents submitted to ICROA by the International Carbon Registry on February 26. Clarifications on several questions were provided on April 12.


| Requirement	Outcome	Explanation
1) Independence	🟢	A COI and impartiality statement needs to be signed by Board members, the CEO, Management, all other personnel and program advisory panel members. The COI policy includes how COIs are prevented, disclosed and dealt with when they arise. VVBs are required to have an impartiality policy in place, which should be applied to the relevant ISO standard for VVBs. The Programme evidences that it is independent from project developers and the market.
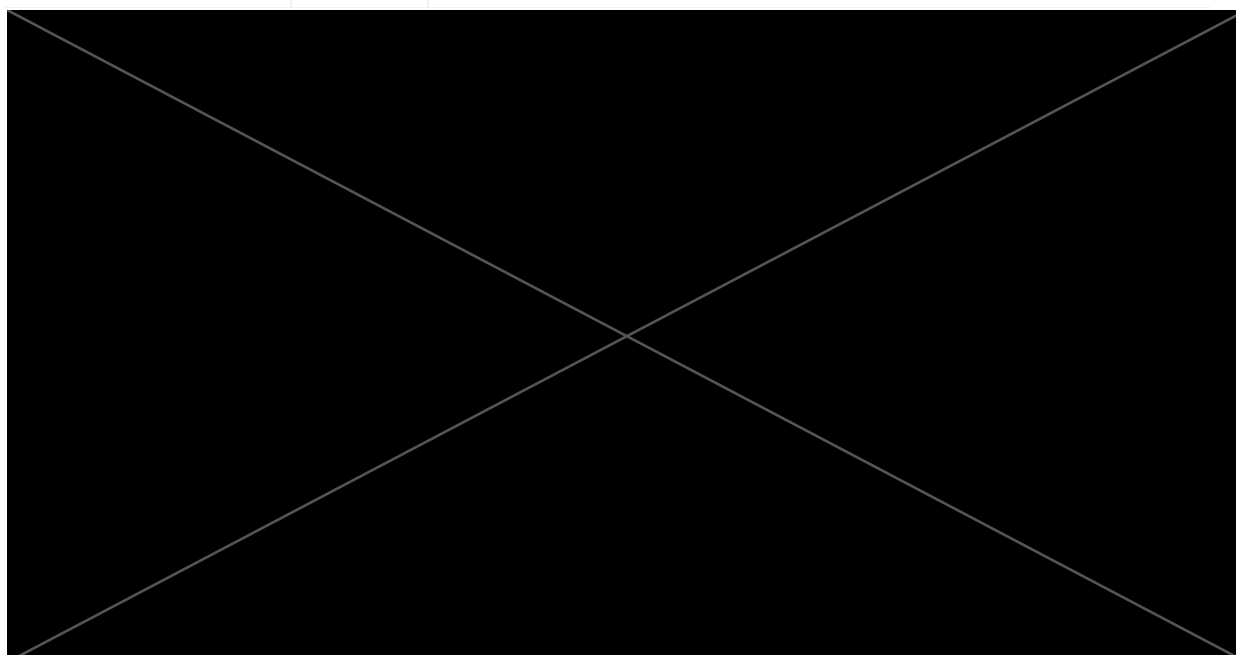
3) Registry	🟢	The registry is publicly available and in English. It includes a registry of credits and all project documentation. On projects with Icelandic documentation, the lack of English language is sufficiently justified. There are procedures in place to guard against Conflicts of Interest (CoI) between the registry operator and the standard.
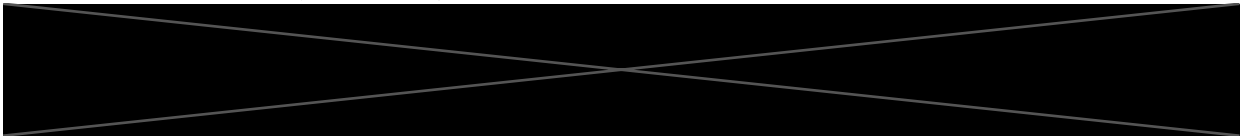
Requirement	Outcome	Explanation
8) Scale	🟢	The Programme has 13 projects registered and issued 700,000 ex-post credits.
9) Additional considerations	🟢	Relatively little information is available online about the Programme. Any media coverage is neutral or positive.

CARBON CREDITING PROGRAMME ENDORSEMENT APPLICATION FORM

Instructions *(may be deleted upon submission)*
- Before applying, the Carbon Crediting Programme ("Programme") should review and understand all criteria in the Programme Endorsement Review Criteria ("Criteria") and requirements outlined in the Programme Endorsement Procedure Guide.
  - *Applicants are encouraged to review and apply the criteria as a framework for refining their crediting programs prior to submitting an application. Aligning with these criteria before submission is essential to improving the likelihood of a successful endorsement.*
- Throughout the application process, you must refrain from externally communicating any association with ICROA, including publishing any statements such as "pending ICROA endorsement."
- Important: All Programmes, new and currently Endorsed, are required to proactively inform ICROA of any updates or changes to the Standard's programme operations or methodologies and provide information regarding the impacted criteria. The IETA Secretariat will review the changes and determine whether a full third-party assessment is required to evaluate compliance with the Criteria.

Contact Information
Please complete the following table with up-to-date contact information.

Name of Programme	International Carbon Registry
Contact Person	Guðmundur Sigbergsson
Contact Email	Guðmundur Sigbergsson
Date of Submission	20. November 2024
Version of Submission	5 (3rd submission)
Brief Overview of Programme (max 150 words)	The International Carbon Registry (ICR) specializes in managing its greenhouse gas (GHG) program and providing registration services for climate projects and issuance of carbon credits and certificates. It employs ISO-standardized protocols to enhance the integrity and reliability of carbon credit issuance and verification, ensuring projects meet stringent quality and integrity standards. This focus supports the voluntary carbon market's credibility and advances ICR's GHG program, delivering tangible environmental and social benefits. Through

	its work, ICR is critical in promoting sustainable practices and using carbon markets strategically to mitigate climate change impacts.
	Relevant website pages for the operation of the ICR program are:
	[ICR homepage](#)
	[ICR program documentation](#)
	[ICR registry public platform](#)
	[ICR registry backend](#) (needs access)

Third application introduction

The International Carbon Registry (ICR) submits this application for its 3rd assessment towards ICROA endorsement, following extensive revisions in response to findings from prior assessments and public consultations. ICR is confident that the ICR program ensures credibility, integrity, and transparency in all transactions with ICCs issued, validation, and verification, safeguarding environmental and social integrity and is in the forefront of standards and technical advancement in the VCMs.
ICR submitted an application for ICROA endorsement for the second assessment after ICR had made revisions to the ICR program during the first assessment and during a public consultation on proposed program revisions

After the public consultation, ICR received the second assessment report from ICROA. ICR considered the comments raised in the assessment report as contribution to the public consultation. In September ICR responded specifically to the comments raised. The response by ICR is further to support this ICR's application and should be considered for any clarifications raised under the second assessment.

In mid October 2024 ICR published the documents subject to the public consultation where ICR had considered all comments raised during the public consultation and the findings of the assessment report.

The press release due to the publication of the revised documentation may be found under ICR's documentation page where changes from the public consultation and the final documentation are transparently disclosed and explained.ICROA can further see all changes made to the public consultation documents in track changes under the public consultation page.

[Welcome to ICR documentation | ICR Program](#)

[Program Revision - July 2024 | ICR Program](#)

For clarity of this application all information provided under *"Changes from first to second assessment"* ICROA can consider them implemented unless *"Changes from last submission"* states otherwise.

ICR is currently in the final stages of connecting with the CAD trust. All connections have been established and the test environment has been tested. ICR will finalize the connection before the end of the year.

APPLICATION QUESTIONS

1. ## Independence

   ### 1.1 Conflicts of Interest

   1.1.1 Provide evidence of the procedure in place to identify and mitigate conflicts of interest (COI) between staff, board members, contractors, and the projects developed under the Programme.

   First submission response

   Conflict of interest (COI) is a particular facet of impartiality, which represents a wider principle. The International Carbon Registry (ICR) is committed to upholding impartiality, thereby addressing COI within its scope. To ensure this, the ICR has established an impartiality policy that is binding for all individuals involved with the ICR and its initiatives. This policy guarantees that all affiliates of the ICR maintain integrity and avoid any conflicts of interest, aligning with the registry's commitment to transparency and ethical standards in carbon management.

   The International Carbon Registry (ICR) is committed to upholding the highest standards of impartiality and objectivity in all its validation, verification, and registration activities related to climate projects. It ensures impartiality by identifying and managing conflicts of interest, maintaining independence and objectivity in judgments, and providing transparent information to all stakeholders. Confidentiality and non-discrimination are pivotal, with all information treated with utmost confidentiality and equal treatment assured for all involved parties. Continuous monitoring and improvement of impartiality policies, along with encouragement for reporting concerns and thorough investigation of complaints, highlight ICR's dedication to maintaining trust and credibility in its services, adhering to international standards and guidelines,

   All individuals involved with the ICR, including personnel, board members, program advisory panel members, and others, are required to sign the impartiality statement. This step is crucial in demonstrating their commitment to maintaining impartiality within their respective roles. Documentation of all these signatures is carefully recorded in the ICR QMS.

   The policy on impartiality is readily available on the ICR's Quality Management System (QMS) and ICR program documentation. Additionally, the ICR's procedures for the management of impartiality are also detailed within the QMS, ensuring a transparent and consistent approach to upholding impartiality throughout the organization's activities.

   Impartiality policy
   Procedure for Management of Impartiality (needs access)

   Changes from first to second assessment

Impartiality statement template has been published on ICR documentation page under policies and document library.

Revised documentation:	NA
Paragraph	NA
Link	https://documentation.carbonregistry.com/documentation/about-icr/leadership/policies/impartiality-policy https://documentation.carbonregistry.com/documentation/icr-program/document-library/documents#impartiality-statement

Changes from last submission
No changes

1.1.1 Provide evidence of the COI declaration for all staff, board members and contractors to sign, and provide evidence that the COI declaration has been signed by the relevant parties.

Within the ICR QMS, documentation for all impartiality statement signatures is available. Upon request, ICR can grant ICROA access to its internal QMS, where these signatures are carefully recorded.

ICR establishes formal agreements with all projects and all approved VVBs (Validation and Verification Bodies) it collaborates with.

These project agreements include specific provisions regarding the relationship between the involved parties:

The relationship of the parties is that of independent contractors dealing at arm's length. Except as otherwise stated in this agreement, nothing in this agreement shall constitute the parties as partners, joint ventures, fiduciaries, or co-owners, or constitute either party as the agent, employee, or representative of the other, or empower either party to act for, bind or otherwise create or assume any obligation on behalf of the other. Neither party shall hold itself out as having authority to do the same.

The standard project agreement is available on ICR's documentation page.

For VVBs, ICR enters into a specific VVB agreement with each entity. Within this standard VVB agreement, there is a provision detailing the nature of the relationship between the parties involved.

The relationship of the Parties is that of independent contractors dealing at arm's length. Except as otherwise stated in this Agreement, nothing in this Agreement shall constitute the Parties as partners, joint ventures, fiduciaries, or co-owners, or constitute either Party as the agent, employee, or representative of the other, or empower either Party to act for, bind or otherwise create or assume any obligation on behalf of the other. Neither Party shall hold itself out as having authority to do the same.

Changes from first to second assessment

No changes

Changes since last submission
No changes

1.1.2 Provide evidence of the COI declaration for all staff, board members and contractors to sign, and provide evidence that the COI declaration has been signed by the relevant parties.

Within the ICR QMS, documentation for all impartiality statement signatures is available. Upon request, ICR can grant ICROA access to its internal QMS, where these signatures are carefully recorded.

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Changes from first to second assessment

No changes

Changes since last submission
No changes

1.1.3 **Provide evidence that the Programme does not have conflict of interest with validation and verification bodies (VVBs) and project developers. Describe how, and at what frequency, the Programme checks to ensure no COIs are present.**

All accredited VVBs are required to have an impartiality policy and procedures in place to manage impartiality in accordance with the standards set by ISO 17029 and ISO 14065. These standards provide detailed requirements for the management of impartiality. A third-party Accreditation Body evaluates both the procedures and their implementation during ongoing accreditation audits to ensure compliance.

Project proponents and developers, unlike VVBs, are not subjected to third-party accreditation for their services. The structure of the ICR program, like other GHG programs, aims to address impartiality issues, including both perceived and actual concerns. Given the unregulated nature of Voluntary Carbon Markets (VCMs), establishing trust through transparent business processes and arm's length decision-making is essential for maintaining credibility.

ICR, as the owner of the registration framework, sets the rules for project compliance, relying on ISO as a standard-setting body. Projects seeking registration with the ICR, and issuance of ICCs must undergo validation and verification to ensure they meet the criteria outlined in the ICR requirements document and ISO 14064-2.

Although ICR is not a VVB itself, it partners with competent and accredited VVBs to assess project conformity. These VVBs adhere to ISO 14064-3 and ICR's validation and verification specifications, along with the structural requirements of ISO 14065.

To ensure VVBs' competency in project assessment, they are accredited under ISO 17029/14065 (or CDM/6.4), with an Accreditation Body, a member of the International Accreditation Forum, confirming their competence.

In summary, project registration with ICR requires compliance with the ICR requirements document and ISO 14064-2. Projects are subject to independent third-party assessments by accredited VVBs to maintain impartiality and ensure a professional review. This arm's length decision-making process ensures the impartiality of the registration process.

Furthermore, ICR maintains an impartiality policy and procedures for managing impartiality. During the final registration and/or issuance of ICCs, ICR reviews all project documentation. Should any risk of impartiality be identified, ICR addresses these concerns during the review process and follows the QMS procedure on impartiality, ensuring the integrity and trustworthiness of the registration framework.

Impartiality policy
Procedure for Management of Impartiality (needs access)
ISO 17029:2019 (see section 4.3 and 5.3)
ISO 14065:2020 (see section 4.3 and 5.3)

Changes from first to second assessment

ICR believes that a need for a special COI or impartiality signing from VVBs is not required as their accreditation principles is to provide impartial assessment/service as outlined in ISO 14065. ICR has however created a paragraph in a revised VVB agreement that ICR intends to request all VVBs to sign in the coming months. Further, ICR has updated ICR definitions providing a definition of impartiality.

Revised documentation:	VVB Agreement v6.0
Paragraph	2.3
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/7.-support/7.5-documented-information/documents#agreements (needs access)

Revised documentation:	ICR definitions
Paragraph	Impartiality
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F0gbGbWJeIBh7nwissl0o%2FICR%20Definitions%20v3.0.pdf?alt=media&token=c0eb44ae-e7ab-4c13-89da-31aff203fd77

Changes since last submission

ICR has now sent out new agreements for VVBs to sign that includes the stipulates the requirements for impartiality of their assessment: *"The VVB declares that the VVB will ensure impartiality and avoid conflict of interest within all its activities relating to its Services to the ICR program and for all personnel related to the Service. The VVB recognizes the importance of providing Service where impartiality is managed and conflicts of interest are identified, disclosed, and managed appropriately."*

1.1.4   Describe how carbon credits from the Programme go to market and the stakeholders involved.
    Describe the Programme's revenue structure and confirm the Programme is not exposed to the sale price of a carbon credit.

ICR generates revenue through a variety of fees, including account fees, project review fees, issuance fees, and fees for secondary transfers. The complete fee schedule is transparently provided on ICR's documentation website. Importantly, ICR's financial model is designed to be independent of the sale price of ICCs, ensuring no exposure to market price fluctuations of carbon credits and impartiality risk.

ICR fee schedule

Changes from first to second assessment
No changes

Changes since last submission
No changes

1.2   Project Development

1.2.1   Describe the Programme's role in the development of carbon credit projects, if any. Confirm the Programme owner / operating entity does not act in the capacity of a project developer.

ICR maintains a strict boundary in its operations by not engaging in project development or offering consulting services to project proponents or developers, covering both project and methodology development spheres.

Changes from first to second assessment
No changes

Changes since last submission
No changes

1.3   Marketplaces

1.3.1   Describe the Programme's role in the sale of carbon credits, if any. Confirm the Programme does not pursue buyers, act in a brokering capacity, or actively market carbon credits.

ICR abstains from engaging in the trading of instruments registered within the registry and refrains from marketing any carbon credits. Instead, its efforts are focused on advocating for the ICR program and the standards that underpin it. To this end, ICR publishes newsletters that may feature information about specific projects. However, the content of these communications is carefully curated to offer insights into the projects' activities and their contributions to climate change mitigation, without promoting or marketing the projects themselves.

On the ICR documentation page, information on how to connect via APIs to the platform, for example marketplaces.

API connectivity

Changes from first to second assessment
No changes

Changes since last submission
Documentation relating to API connectivity, marketplace integrations and smart contracts on-chain have been improved. Only documentation relating to how marketplaces can integrate with us. No changes to ICR acting as brokering or marketing credits. The information is only presented as additional transparent guidelines on how the ICR registry operates. See:

https://documentation.carbonregistry.com/documentation/carbonregistry.com/marketplaces

https://documentation.carbonregistry.com/documentation/carbonregistry.com/on-chain

https://documentation.carbonregistry.com/documentation/carbonregistry.com/api

1.3.2 If the Programme has a marketplace, describe how the marketplace functions. Provide evidence that the Programme does not set the price of carbon credits that are sold on its marketplace.

Operating a marketplace and having a stake in the sales of carbon credits present significant impartiality and integrity risks for both ICR and the broader Voluntary Carbon Market (VCM). ICR does not operate a marketplace nor does it plan to establish one. Nonetheless, ICR's registry technology is designed for seamless integration with third-party marketplaces via API connections, facilitating transactions without ICR having any commercial interest in these integrations. This approach underscores ICR's commitment to maintaining high standards of impartiality and integrity within the VCM ecosystem.

Changes from first to second assessment
No changes

Changes since last submission
No changes

2. Governance

2.1 Effective Governance

2.1.1 Share the Programme's publicly available organisation chart that shows the governance structure, including the makeup of the Board. Describe the responsibilities of the Board.

The organizational chart for ICR is accessible on the documentation and QMS page of ICR's website, providing clear visibility into the structure of the organization.

Procedures established by the ICR board delineate the responsibilities of the board members in relation to the oversight and management of the ICR program, ensuring accountability and effective governance.
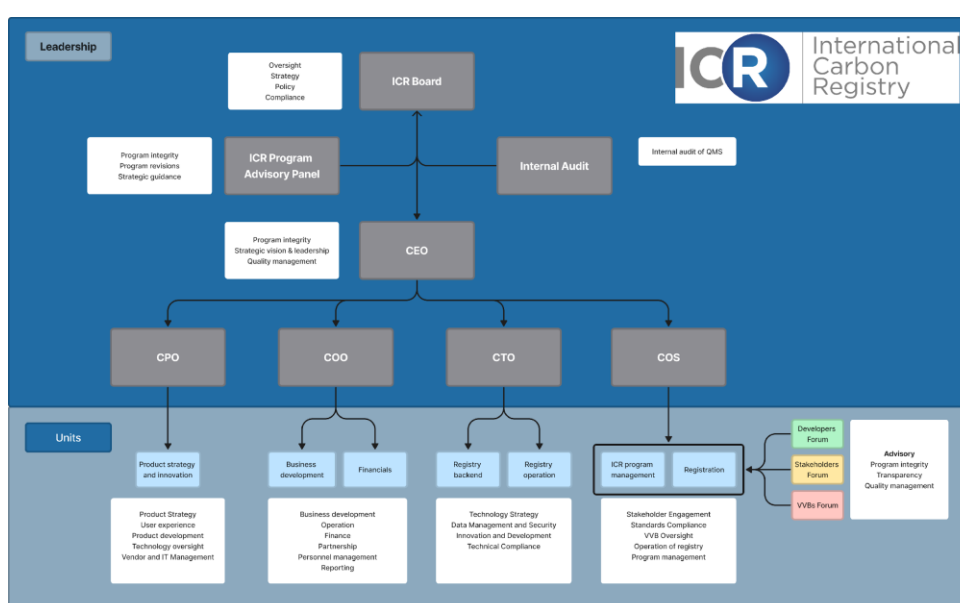

Figure 1: Organizational chart

The ICR board shall meet as necessary but no less than biannually for discussion of the operations of the ICR program management. All documentation for the ICR board meetings shall be made available to members in due time.
The ICR board controls the ICR under the guidance and recommendations of the PAP and ICR CEO. In this context, the ICR board shall:

- *Set out the strategic direction of the ICR and actively seek expansion opportunities.*
- *Follow carbon market developments.*
- *Make decisions on further documentation for the ICR program, as appropriate.*
- *Make decisions on any revisions, amendments, or additions to requirements and procedures.*
- *Approve new methodologies and/or revisions.*
- *Set out requirements for approval of VVBs, following accreditation standards, further:*
  - *Decisions on suspension, and withdrawal of approval.*
  - *Operationalization of procedures and standards for approval.*

- *Identify barriers to implementing activities and mitigations of barriers to support funding of project activities, as necessary.*
- *Review the operation of the ICR program with input from internal audit.*
- *Approve and make requirements, processes, methodologies, and standards publicly available.*
- *Develop and maintain the ICR registry for project activities containing information on registered project documentation and information on all ICCs issued.*
- *Address issues relating to ICR documentation.*
- *Carry out any other issues regarding the operation of the ICR program.*

In addition to the duties outlined in the ICR board procedures, the ICR board also oversees the management of a Quality Management System (QMS), where it is tasked with the annual responsibility of conducting a management review. This entails a systematic evaluation of ICR's performance, effectiveness, and alignment with strategic objectives. The review process incorporates an assessment of quality objectives, audit outcomes, and pertinent data to ensure continuous improvement.

Detailed information regarding the leadership structure of ICR is available under ICR documentation, including the roles, responsibilities, and authorities of the ICR board, ensuring transparency and accountability within the organization's governance framework.

Under leadership on ICRs program documentation page information about the governance is publicly available also ICR board procedures and the ICR program advisory panel.

Leadership
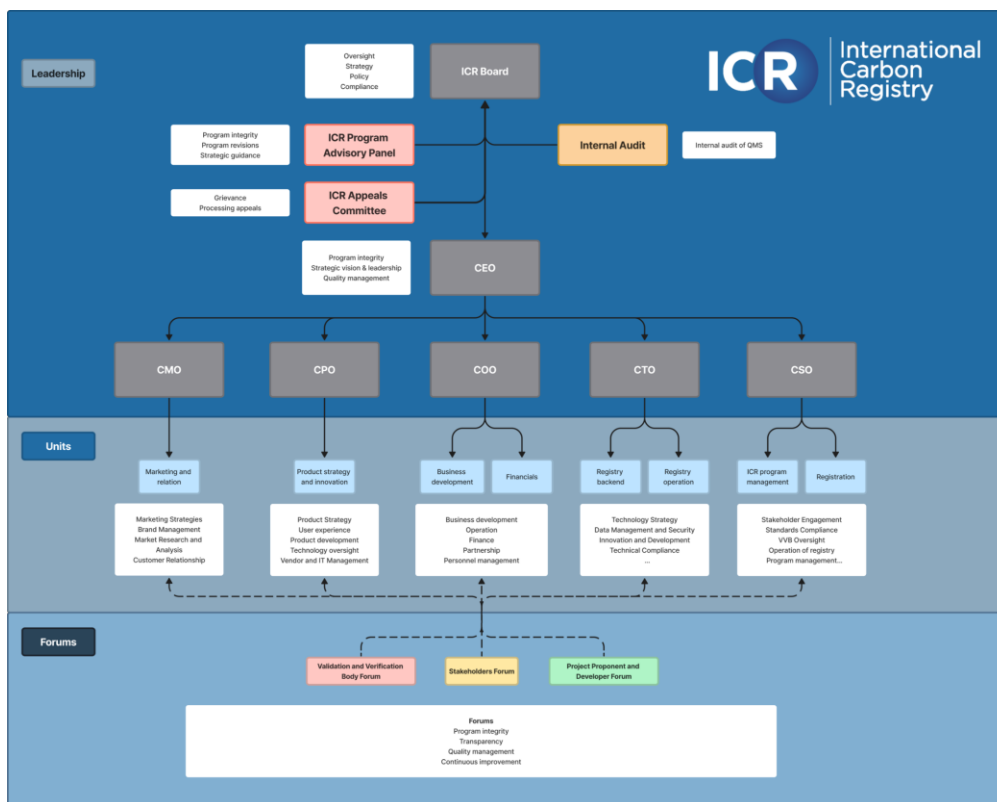Organizational Roles, Responsibilities, and Authorities
ICR Board Procedures
ICR Program Advisory Panel

Changes from first to second assessment
As the ICR team has expanded a new org. chart can be found on ICR's website, also below. Further details on how forums input should funnel into all units of the ICR is provided in more clarity. Guðmundur Sigbergsson has now been appointed as a CEO, Ólafur Torfason COO and Rannveig A. Guicharnaud has been hired as a CSO.

Revised documentation:	NA
Paragraph	NA
Link	https://documentation.carbonregistry.com/documentation/about-icr/leadership/organizational-roles-responsibilities-and-authorities

https://documentation.carbonregistry.com/documentation/about-icr/leadership/organizational-roles-responsibilities-and-authorities/leadership |

Changes since last submission
No changes

2.1.2 Provide evidence of the publicly available description of how appointments are made to leadership, committees, and groups.

In the leadership section of ICR's Quality Management System (QMS), detailed information is provided on how panels and forums play a crucial role in the development of the ICR program. This section outlines the mechanisms through which these groups

contribute insights, feedback, and expertise, fostering continuous improvement and innovation within the program.

ICR´s leadership comprises the CEO, COO, CTO, CPO, COS, and the ICR´s board, and it is considered top management. The leadership commits to continuous development and implementation of the QMS by:
a) *Taking responsibility for the effectiveness of the QMS;*
b) *Ensuring that the quality policy and objectives are set for the QMS and its processes, which are consistent with the external strategy and context of the company;*
c) *Ensuring the integration of the QMS requirements and the requirements of the standard ISO 14064-2, ISO 14064-3, ISO 14065, and ISO 14066 with other activities of the company, as applicable;*
d) *Promoting personnel and external party awareness of the QMS;*
e) *Ensuring that necessary resources are available for the QMS;*
f) *Communicating the importance of effective quality management, compliance with the management system requirements, and meeting the requirements of the standards ISO 14064-2, ISO 14064-3 ISO 14065, and ISO 14066;*
g) *Ensuring that the QMS achieves the intended results;*
h) *Participating, guiding, and supporting personnel and external parties in contributing to the effectiveness of the QMS;*
i) *Promoting continuous improvements;*
j) *Supporting the appropriate management roles of others to demonstrate their leadership as appropriate for their areas of responsibility.*

The procedure of ICR's board review includes ensuring the satisfaction of its customers by identifying their needs and expectations. These are translated into requirements that ICR shall meet to ensure customer satisfaction. At the same time, ICR ensures that the interests it needs to protect are secured, including impartiality and the requirements made to ICR according to laws, rules, and standards, including ISO 14065, where relevant.

This is done by ensuring that:
a) *Customer and relevant legal and regulatory requirements are determined, understood, and always met;*
b) *Risks and opportunities that may affect the consistency of the service provided by ICR and the ability to increase customer satisfaction are identified, assessed, and addressed;*
c) *Impartiality is maintained in all respects;*
d) *The emphasis on increasing customer satisfaction is maintained;*
e) *The emphasis is placed on continually meeting the requirements of the standard ISO 9001.*

The positions of CEO, COO, CTO, CPO, and COS were established by the founding members of ICR and carbonregistry.com, marking the initial leadership appointments within the organization. Subsequent appointments to the Program Advisory Panel (PAP) are managed according to the ICR Program Advisory Panel procedure, ensuring a structured and transparent process for selecting members who contribute to the advisory functions of the program.

The PAP consists of 3 – 5 technical experts, referred to as members. Members shall possess strong knowledge about the ISO 14060 family of standards, and GHG program procedures, including the development of projects, application and development of methodologies, modules, and tools, and the responsibilities of validation/verification bodies. They shall be familiar with trends in carbon market dynamics, e.g., policies, organizational demand, and the market mechanism. Members can be project proponents, developers, interested parties, organizations, or auditors but shall maintain impartiality in all their advisory to the ICR. All members shall sign an impartiality statement.

Information about how the board is comprised is available in ICR's articles of association.

See further
Articles of Association
Organizational Roles, Responsibilities, and Authorities
ICR Board Procedures
ICR Program Advisory Panel

Changes from first to second assessment
ICR has hired a Chief Marketing Officer. The CMO leads marketing efforts and ensures that marketing strategies align with ICR's goals. Please see further here.

ICR has published terms of reference (ToR) of the ICR appeals committee. The ToR includes information about how the committee is appointed.

ICR has revised its articles of association where paragraphs 15, 16 and 17 have been amended to address comments raised during clarification of the ICR program.

New documentation:	ICR Terms of Reference Appeals Committee v1.0
Paragraph	3
Link	https://documentation.carbonregistry.com/documentation/about-icr/leadership/organizational-roles-responsibilities-and-authorities/committees/icr-appeals-committee-terms-of-reference

Revised documentation:	ICR Articles of Association
Paragraph	15, 16, 17
Link	https://documentation.carbonregistry.com/documentation/about-icr/articles-

	of-association-for-international-carbon-registry-ehf.

Changes since last submission
No changes

2.1.3 Confirm the Programme complies with all laws and regulations related to the business in the jurisdiction in which it is registered as a business. Provide evidence, as available.

ICR maintains a reputable status and details regarding its public registration in Iceland are accessible through the Icelandic tax authorities www.skattur.is. Upon request, ICR is prepared to furnish a statement from the Icelandic tax authorities to affirm its standing.

Changes from first to second assessment
No changes

Changes since last submission
No changes

2.1.4 Describe how the Programme transparently makes decisions. Provide evidence of decision-making provisions in the bylaws or Terms of Reference of specific decision-making forums.

ICR's program documentation, which is publicly accessible, provides comprehensive details on the decision-making processes of the ICR board and the operational framework of the ICR Program Advisory Panel.

Furthermore, the roles and responsibilities, along with the authorities of the leadership team, are transparently outlined in the QMS, where the public can access detailed information about the leadership structure.

For the forums managed by ICR, detailed terms of reference are established for each, covering objectives, roles and responsibilities, eligibility criteria, operational guidelines, communication protocols, and more. These terms of reference are readily available within ICR's program documentation and ICR's QMS, ensuring transparency and clarity on the governance and operational standards of these forums.
See ICR program documentation under leadership and further in ICR Board procedures and ICR Program Advisory Panel.

See further information here:
Articles of Association
Organizational Roles, Responsibilities, and Authorities
ICR Board Procedures
ICR Program Advisory Panel

Changes from first to second assessment

Articles of Association have been amended and the organizational chart.

Revised documentation:	Articles of Associations
Paragraph	15,16, 17
Link	https://documentation.carbonregistry.com/documentation/about-icr/articles-of-association

Revised document	Organizational chart
Paragraph	NA
Link	https://documentation.carbonregistry.com/documentation/about-icr/leadership/organizational-roles-responsibilities-and-authorities

Changes since last submission
No changes

2.1.5   Provide evidence of publicly available procedures and quality control mechanisms to enforce procedures. Describe how these procedures were developed and which standards they are based upon (i.e., ISO 9001, 31000).

ICR has recently implemented a management system for the ICR program in alignment with the ISO 9001:2015 and intends to have it certified by a 3rd party certification body in 2024. The processes and procedures related to the ICR QMS, along with governance information, are publicly accessible on the ICR website. However, certain details remain confidential and are not disclosed publicly to safeguard security and privacy. The publicly accessible QMS documentation is available through the ICR program documentation website. Additionally, upon request, ICROA may be granted access to the internal QMS of ICR, allowing for a deeper insight into the organization's quality management practices.

ICR QMS

Changes from first to second assessment

ICR has revised some of its QMS processes and procedures to address comments raised from the last submission. ICR will not seek ISO 9001:2015 certification in 2024 but will aim to start the certification process in 2025.

Changes since last submission

No changes

2.2 Transparency and Publicly Available Information

2.2.1 Provide evidence that the following information is publicly available on the Programme's website and/or in standalone, version-controlled documents:

- **Operating procedures that include, at minimum, how Programme rules are drafted and revised and how committees are formed, as well as how these are approved by the board.**
- **Methodology development procedures that include, at minimum, requirements for expert involvement and public consultation, and a description of the frequency at which methodologies are updated.**
- **A grievance and redress mechanism that is accessible to project developers, project stakeholders, and the public, and includes, at minimum, a description of how grievances will be addressed by the Programme.**

All relevant procedures, requirements, and program-related information are publicly available on the ICR program documentation page. This includes publicly accessible QMS procedures and processes that are integral to the operation and management of the ICR program in addition to program related documentation, criteria, processes, templates etc.

ICR has established forums to facilitate ongoing engagement with stakeholders. These forums are:

a) ICR VVB Forum
b) ICR Project Proponents/Project Developers (PP/PD) Forum
c) ICR Stakeholder Forum

Each forum's terms of reference detail the eligibility criteria for participation and operation procedures.

Committees can be formed within these forums to address specific issues in detail, should forum members identify a need for targeted discussion.

For the development and approval of methodologies, ICR mandates adherence to the ICR Methodology Requirements and the ICR Methodology Approval Process. ICR also provides a methodology template. Methodologies shall align with ISO 14064-2 standards (at the methodology level, not the project level) and meet specific criteria for the climate solution/technology, as well as follow defined procedures to comply with program requirements. VVBs are tasked with assessing methodologies at the methodology level to ensure they meet both ISO 14064-2 standards and ICR requirements.

Methodologies must be validated by a VVB that is in agreement with ICR and accredited according to ICR requirements (ISO 14065 or CDM/6.4) for the methodology's sectoral scope.

A 30-day public consultation period is mandatory for all methodologies, which shall then be applied to a project, real or just for demonstration of the methodology application only.

Upon validation, ICR conducts a completeness review of the methodology documentation and submits it for ICR board approval. The board's approval focuses on the adherence to the methodology approval process by the methodology developer, VVB, and ICR, rather than on the content of the methodology itself.

ICR's Grievance Policy, accessible on the ICR documentation page, outlines how interested parties can submit complaints through the ICR grievance process. Additionally, there is a procedure for customer feedback and complaints aimed at capturing, addressing, and learning from customer interactions to ensure responsiveness and foster continuous improvement. The process for handling complaints and appeals related to ICR's decisions is detailed and publicly available for transparency. This structured approach underscores ICR's commitment to stakeholder engagement and quality management within the carbon registry framework.

ICR VVB Forum
ICR Project Proponents/Project Developers (PP/PD) Forum
ICR Stakeholder Forum
ICR Process requirements
ICR Methodology Requirements
ICR Methodology approval process
ICR Grievance Policy
ICR Grievance Process
ICR validation and verification specifications
Public stakeholder procedure (Needs access)
Management of change (Needs access)

Changes from first to second assessment
ICR procedure Management of Change has been amended to include more details about program revision and referring specifically to a new Public consultation process that has been published in ICR's QMS. In addition, on the ICRs appeals committee, terms of reference have been published that outline the appointment of members.

Revised documentation:	ICR procedure - Management of change
Paragraph	4

Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-management-of-change (needs access)

New documentation:	ICR process - Public consultation
Paragraph	All
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/ghg-program-management/public-consultation (needs access)

New documentation:	ICR appeals committee terms of reference
Paragraph	All
Link	https://documentation.carbonregistry.com/documentation/about-icr/leadership/organizational-roles-responsibilities-and-authorities/committees/appeals-committee

ICR has strengthened the ICR methodology approval process. Relating to review of methodologies, if they are not considered to reflect best practices, scientific consensus etc. Also stipulation on periodic review of methodologies developed under ICR. This includes a detailed process on frequency of review of methodologies, details about public consultation, withdrawn methodologies and addressing the scientific rigorness of methodologies. ICR has further revised the length of Public consultation of methodologies to 30 days. ICR has also revised the ICR validation and verification specifications to further guide VVBs on the validation process of methodologies.

ICR has revised ICR validation and verification specifications where during risk assessment for validation/verification VVBs shall consider if methodologies align with best practices, on the basis of the best available scientific knowledge, and technical advancements.

Revised documentation:	ICR methodology requirements
Paragraph	3
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfldoGcZZdvap67xjb5h1%2Fuploads%2FElQs2TI1ea136oA8z1nH%2FICR%20Methodology%20Requirements%20v3.0.pdf?alt=media&token=e944c540-caa7-4e50-b92d-f9231342bf23

Revised documentation:	ICR methodology approval process
Paragraph	1.5, 2.2, 2.3, 3
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfldoGcZZdvap67xjb5h1%2Fuploads%2FPYzwoHM6ghAWl37edsQ8%2FICR%20Methodology%20Approval%20Process%20v3.0.pdf?alt=media&token=0c025e38-813f-4a40-832f-b8983ee798ac

Revised documentation:	ICR validation and verification specifications
Paragraph	6.1.2.3, 6.1.2.7, 7.1.1, 7.1.4.1, 11
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfldoGcZZdvap67xjb5h1%2Fuploads%2FvJS5GWjMIyUpq2GnvDZt%2FICR%20validation%20and%20verification%20specifications%20v2.0.pdf?alt=media&token=937f71e3-f91e-41bd-967d-4b1ebde339a0

New documentation:	ICR process - Public consultation
Paragraph	All document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/ghg-program-management/public-consultation (needs access)

Changes since last submission

ICR has added a stipulation that methodologies are to have expert involvement in the final documentation post public consultation to ensure credibility and technical accuracy.

ICR initially considered specifying expert involvement in methodology development unnecessary, as the requirement inherently implies the involvement of experts. ICR recognized that omitting this requirement could lead to confusion and varied interpretations. To ensure clarity and align with ICROA requirements, the published version of the ICR Methodology Requirements v.3.0 explicitly includes a provision for expert involvement in the text.

See section 5 paragraph 3 ICR methodology requirements v3.0.

"Methodologies may be developed by project proponents, stakeholders, or ICR and should include participation by sectoral experts. Methodologies shall be validated by a VVB, accredited for the sectoral scope the methodology applies to and be approved by ICR through the ICR methodology approval process, confirming application under the ICR program and its conformity to the requirements herein, and ISO 14064-2. Methodologies shall demonstrate how they meet the requirements in this document and ISO 14064-2 at a methodology level. Methodologies shall be written clearly and concisely."

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR methodology requirements
Paragraph	5
Link	https://documentation.carbonregistry.com/documentation/icr-program/methodology-

	development/criteria/icr-methodology-requirements-v3.0

Revised documentation:	ICR requirement document
Paragraph	1.4
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised documentation:	ICR methodology requirements
Paragraph	3
Link	https://documentation.carbonregistry.com/documentation/icr-program/methodology-development/criteria/icr-methodology-requirements-v3.0

Revised documentation:	ICR methodology approval process
Paragraph	1.5, 2.2, 2.3, 3
Link	https://documentation.carbonregistry.com/documentation/icr-program/methodology-development/procedural/icr-methodology-approval-process-v3.0

Revised documentation:	ICR validation and verification specifications
Paragraph	6.1.2.3, 6.1.2.7, 7.1.1, 7.1.4.1, 11
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

2.2.2 If the Programme references other Standards (i.e., CDM additionality tool, methodologies), describe the process in place to ensure that changes to the referenced Standards are reflected in the Programme's processes.

ICR references particularly the ISO 1406x series of standards and supplementing IAF documentation relating to validation, verification, auditing and accreditation.

ICR acknowledges further and incorporates elements from other programs, with a particular emphasis on the Clean Development Mechanism (CDM). It endorses the use of active methodologies and suggests that proponents can utilize tools to show compliance with the criteria. ICR is committed to an ongoing review process of new methodologies, revisions, and tools to evaluate their relevance and applicability.

It is important to highlight that the standards for validation include ISO 14064-2 and the specific requirements set by ICR. Additionally, project-specific criteria may broaden the scope of validation, incorporating, for instance, methodologies approved by ICR as part of the validation criteria. This approach ensures a comprehensive and rigorous assessment, aligning with both ICR's standards and international best practices.

A methodology refers to a systematic approach or set of procedures used to quantify and measure GHG emissions mitigations. These methodologies provide a standardized framework for estimating, monitoring, and verifying emission mitigations, allowing for consistent and comparable results across different projects. These methodologies typically establish criteria and prescribe procedures for projects to follow for data collection, quantification, monitoring, and reporting of GHG emissions mitigations for projects ex-ante and ex-post.

If approved methodologies do not cover the project activities, the project proponent may develop a project by establishing methodological criteria and procedures according to the requirements of ISO 14064-2 and the ICR requirement document, e.g.:
- *Boundary*
- *Baseline*
- *Additionality*
- *Quantification*
- *Monitoring*

When establishing methodological criteria and procedures, ISO 14064-2 states in section 6.1 that project proponents shall identify, consider and use all relevant criteria and procedures for every stage of the GHG project cycle where these are available. Here, consideration of section 0.3 in ISO 14064-2 is relevant.

If criteria and procedures are not available, the project proponent shall use relevant current good practice guidance. The project proponent shall select and apply established criteria and procedures from a recognized origin, if available. Often methodologies developed under GHG programs are considered a recognized origin.

The evaluation of changes in referenced documentation involves a collaborative effort among the Project Developer (PD), the Validation and Verification Body (VVB), and ICR.

The PD is required to utilize the latest version of best practices from a recognized source or furnish justification for the applicability of an older version. In turn, the VVB is responsible for evaluating the application of any tools and methodologies during assessment to ensure they conform to the validation criteria.

Furthermore, as part of the final project registration and/or the issuance of instruments in the registry, ICR conducts a review for completeness. This review includes examining the application of any tools to confirm adherence to required standards.

Moreover, ICR continuously monitors and evaluates the status of methodologies, ensuring they remain in alignment with the management of change as outlined in the ICR QMS. This systematic approach guarantees that all components contributing to the validation and registration processes are up-to-date and meet ICR's quality standards.

See references to tools in both ISO 14064-2 and the ICR requirement document. Further ICR methodology approval process stipulates periodical review of approved methodologies.

Public stakeholder procedure (Needs access)
Management of change (Needs access)
ICR Methodology approval process
ICR requirement document
ISO 14064-2

Changes since first to second assessment
ICR has updated the ICR Procedure - Regulatory and Legal Compliance and included identification of relevant standards referred to in the ICR program in regular review. This relates then to the ICR Procedure on Management of Change (please see above).

For approved program methodologies (CDM). ICR has revisited the ICR approved methodologies to reflect the intention of the ICR to approve generally all the latest versions to the CDM methodologies and tools as outlined in the ICR requirement document (5.3.1). The same applies to the ICR requirement document that has been revised to address approval of CDM methodologies, modules and tools.

Revised documentation:	ICR requirement document
Paragraph	1.4
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FIdoGcZZdvap67xjb5h1%2Fuploads%2F5ecDWFW3LcUpu819e8RO%2FICR%20Requirement%20Document%20v6.0.pdf?alt=media&token=3518c344-0e0e-4079-8bc8-89029523163d

Revised documentation:	ICR approved methodologies
Paragraph	All document
Link	Approved methodologies	ICR Program (carbonregistry.com)

Revised documentation:	ICR Procedure - Regulatory and Legal Compliance
Paragraph	Legal Review and Analysis, Documentation of Compliance Requirements
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-regulatory-and-legal-compliance

Changes since last submission

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR requirement document
Paragraph	5.3.1
Link	ICR_Requirement_Document_v6.0	ICR Program

3. Registry

3.1 Describe the registry provider and relationship to the Programme. Provide evidence the registry is publicly available and available internationally.

ICR operates a registry system developed by Mojoflower ehf., which operates and runs the registry platform and the CarbonRegistry.com website. Mojoflower is a company based in Iceland. In February 2024, ICR and Mojoflower ehf. went under joint ownership of Gaia group ehf. and Loftslagsskrá Íslands ehf. had a name change to International Carbon Registry ehf. Both entities are now wholly owned by Gaia Group ehf., positioning ICR and Mojoflower ehf. as sister companies. This close collaboration between the two companies enhances their operational synergy and effectiveness in the GHG program operation and carbon registry domain. More details about the organizational structure are available on the ICR program documentation page. Information about all companies is readily available on Icelandic Tax Authorities pages/company register. https://www.skatturinn.is/fyrirtaekjaskra/
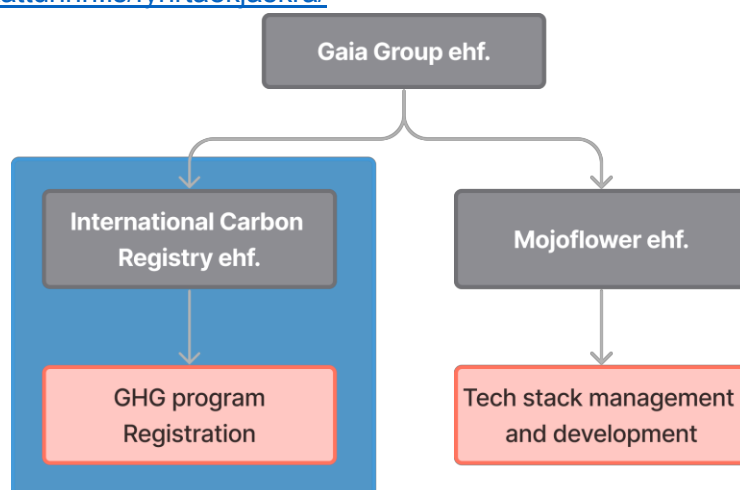

Figure 2: Relationship with registry provider.

The registry platform is accessible to anyone with an internet connection at www.carbonregistry.com. The site features a comprehensive hierarchy of the registry accessible through www.carbonregistry.com/explore, organized into several key sections:
- **Projects**: Provides an overview of projects along with their registration status.
- **Methodologies**: Displays methodologies in a format akin to the CDM methodology booklet, offering detailed insights.
- **Sectors**: Gives an overview of the various sectors covered by the registry.
- **Credits**: Lists the credits that have been issued, including details on each.
- **Organizations**: Presents information on organizations holding a registry account, including optional details such as credit inventory, associated projects, and more.
- **Insights**: Features posts from organizations or projects, sharing updates or findings.

All information available publicly from projects is accessible on the platform. Additionally, the registry's credit database leverages public blockchain technology for all credit issuances, transactions, and retirements/cancellations, with data verifiable on TheGraph

at https://thegraph.com/hosted-service/subgraph/skjaldbaka17/carbon-registry-main-test.
More details on how ICR employs blockchain technology for credit issuance and transactions are provided on the ICR documentation page at https://documentation.carbonregistry.com/documentation/on-chain/how-it-works, offering a deeper understanding of the registry's operational framework.

Changes from first to second assessment
No changes

Changes since last submission
ICR has introduced a new feature called the Carbon Directory where different stakeholders can establish a profile. A service designed to help stakeholders to explore, connect, and engage with organizations, companies, and professionals across the carbon industry. Currently, organizations that have been through the Know Your Business (KYB) and Know Your Customer (KYC) processes are allowed to list themselves publicly on this page. For more information, visit:
https://www.carbonregistry.com/directory
This is a new feature allowing for better communication within the carbon space. The registry is still operating from www.carbonregistry.com. No changes have been made to the functionality of the registry, public access, etc.
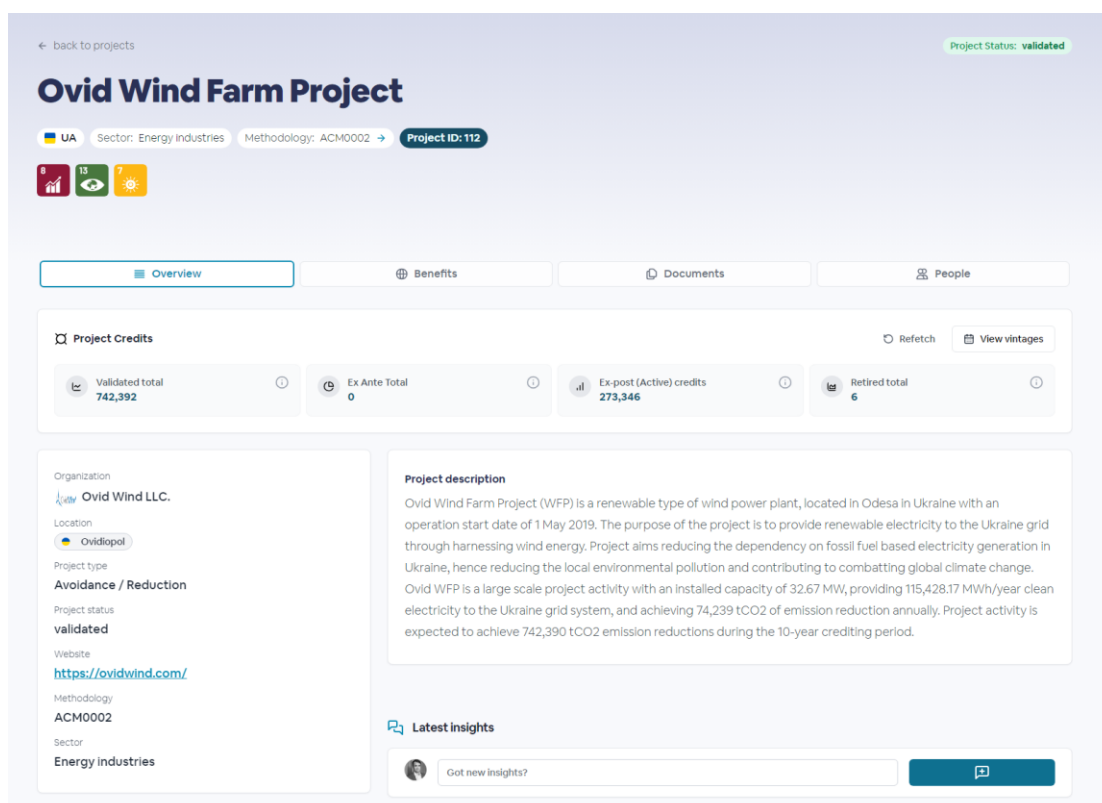
3.2   Provide evidence that the registry provides public access to underlying project information including, at minimum, project descriptions, monitoring reports, and validation and verification reports.

Through the public platform, accessible information includes Project Design Documents (PDDs), Monitoring Reports (MR), Validation Reports (ValR), and Verification Reports (VerR). The ICR process requirements detailed information are mandated to be publicly accessible, ensuring transparency and accountability.
For further details on the transparency and procedural guidelines of the ICR program, please refer to: https://documentation.carbonregistry.com/documentation/icr-program/procedures. Additionally, to explore projects and access the specified documents directly, visit: https://www.carbonregistry.com/explore/projects.

Links to a project that has been validated and monitoring verified is below.
https://www.carbonregistry.com/explore/projects/ad2dec62-85d2-46b9-884f-fd2180453b0

Here, a summary page of the project, along with validated GHG emission mitigation, issued credits, retirements, documentation, benefits, etc., can be found.

See:

ICR Process requirements

ICR registry user guide

Changes from first to second assessment
No changes

Changes since last submission
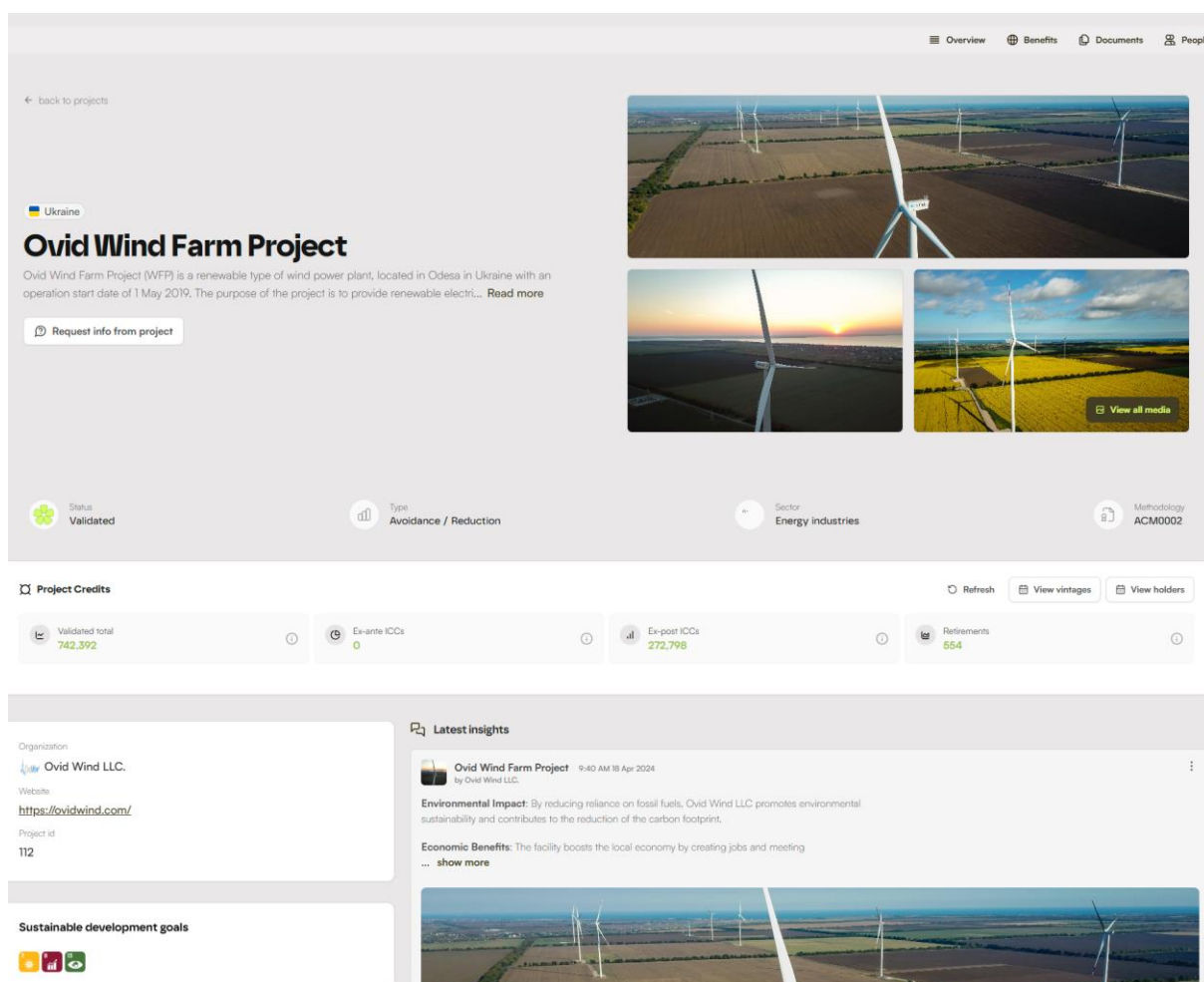
Figure 1: project page new version of registry platform

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR process requirements
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

3.3 Provide evidence that the registry individually identifies units through unique serial numbers.

Project owners who wish to issue credits initiate a credit issuance request through the registry system. This request includes linking a monitoring and verification report. An ICR

admin thoroughly reviews the reports, ensuring that the requested amount of credits aligns with the verified data. Based on this evaluation, the admin either approves or declines the request.

Once the "mint new credits" request is approved, new tokens (credits) are minted (issued) that correspond to the token ID of the project's contract. This minting process takes place on the blockchain, ensuring transparency and traceability. As a result, anyone can verify the issuance of new credits by examining the blockchain and confirming the updated token balances linked to the project.

The aforementioned process utilizes blockchain technology and the registry system to establish an auditable and transparent framework for issuing and validating carbon credits. By employing token IDs, data structures, and the oversight of ICR admin, the integrity, verifiability, and reliability of the issued credits are ensured. This approach fosters accountability and facilitates the adoption of sustainable practices.

It is important to note that the registry relies on the blockchain as the sole authoritative record for the registration of issued carbon credits. There is no centralized database for this purpose. Therefore, the credits that exist on the blockchain are the only ones that have been officially issued by ICR.

Serial numbers play an important role in ensuring the integrity and traceability of carbon credits. Even though the tokenization of credits on a chain ensures the uniqueness of a project and credit, a credit serial number further serves as a consistent unique identifier assigned to each vintage of each project, representing a reduction, avoidance, or removal of CO2-e. The serial number ensures that each credit is distinct and traceable. Relying on serial numbers helps prevent double counting and fraud. It ensures that a specific carbon credit can be tracked throughout its lifecycle, from issuance to retirement, essential for maintaining credibility.

The serialization helps to easily see the attributes of the credits and to compare projects. The serialization structure is provided for below.

Component	Order	Type	Length	Range	Comment
Credit identifier	1	Letter	3	Text	Fixed value. Unique registry identifier. (ICC, FCC)
Project country	2	Letter	3	ISO 3166-1	Three letter country code for the project (e.g., Iceland is ISL).
Project country dialing code	3	Numeric	3	1-999	Three digit country code for the project (e.g., Iceland is 354).
Project ID	4	Numeric	4	1-9999	Registry assigned identifier for the project, unique in the registry.
Sector	5	Numeric	2	1-16	Sectors from CDM
Type	6	Letter	1	A,R,H	Avoidance, Removal, Hybrid

Host country attestation	7	Numeric	1	1;0	1 = Yes, 0 = No attestation
Vintage (Year)	8	Numeric	4	0-9999	The vintage year of the credits.
Multiple project activities	9	Numeric	3	0-999	ID of a sub-project. If not multiple project activities, this identifier is not used.

Example: ICC-ISL-354-33-13-A-0-2022

GHG program: *International Carbon Registry*
Project country*: Iceland*
Dialing code: *354*
Project ID: *33*
Sector: *Waste handling and disposal*
Type: *Avoidance*
Host country attestation: *No approval for ITMO transfer.*
Vintage*: 2022.*
Multiple project activities: *Not a Multiple project activity.*

Further information on how blockchain is used for the tokenization of credits and how they're managed on-chain is available on the ICR program documentation page.

Information about serialization is available in the ICR process requirements and user guide. See:

ICR Process requirements

ICR registry user guide

Changes from first to second assessment
No changes

Changes since last submission
The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR process requirements
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

3.4 Provide evidence that the registry can identify credit status including, at minimum, "issued", "retired", and "canceled".

The ICR definitions section offers clear explanations of key terms such as issuance, retirement, cancellations, ex-ante, and ex-post (Active) ICCs. The processes for issuing, retirements, and cancellations are comprehensively described in the ICR process requirements, ensuring stakeholders understand the framework.

For practical guidance on interacting with ICCs of varying statuses, the ICR registry user guide serves as a valuable resource. It provides step-by-step instructions on how to engage with ICCs, whether they're issued, retired, or cancelled.

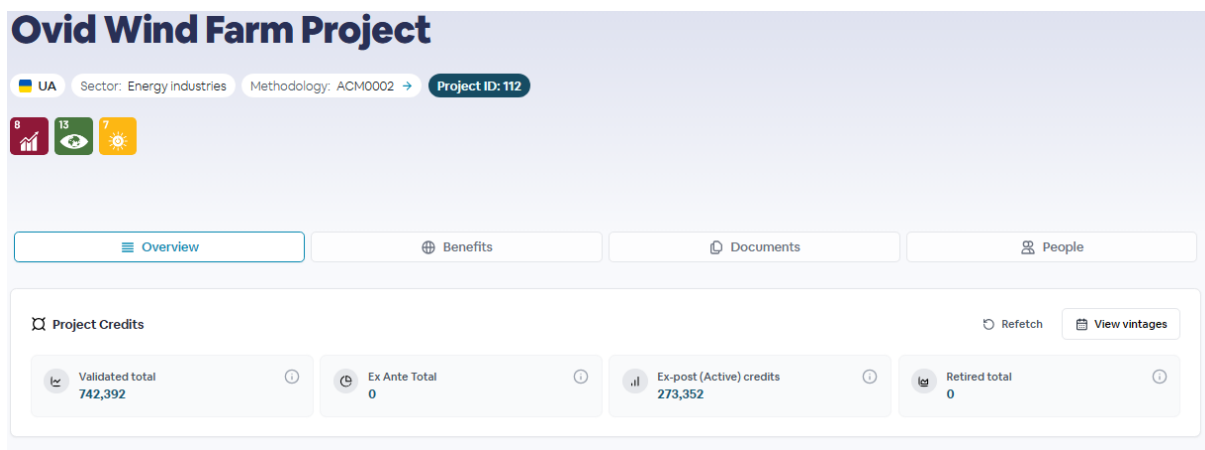*Figure 3: overview of different statuses*
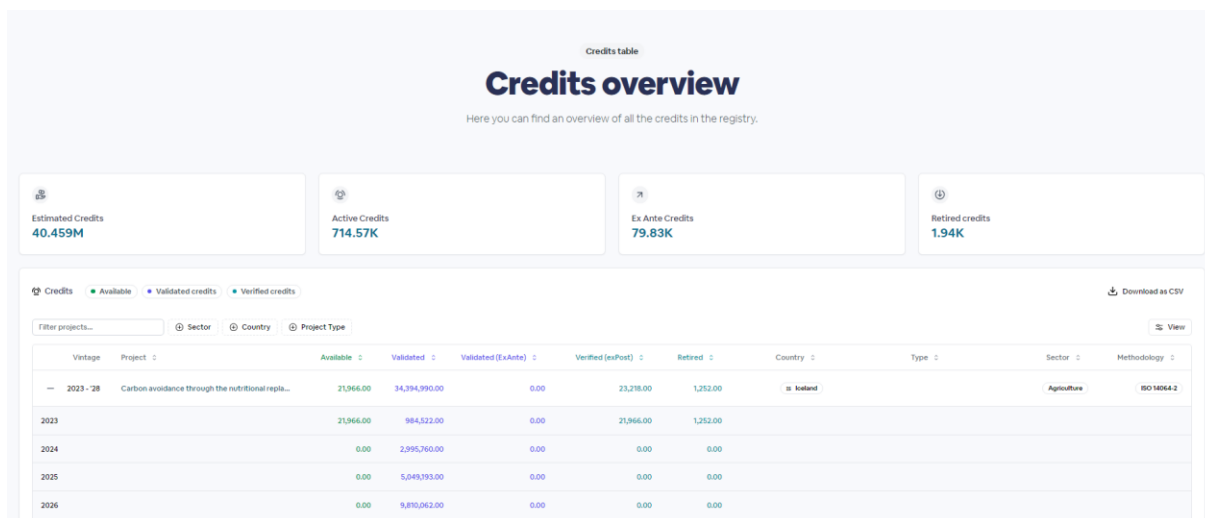
Figure 4: Credits page

Access to credit inventory can be accessed here:

https://www.carbonregistry.com/explore/credits

Further information relating to credit inventory for each project is also available on each project page and clicking "View vintages" from the overview page.

https://www.carbonregistry.com/explore/projects/ad2dec62-85d2-46b9-884f-fd218a0453b0
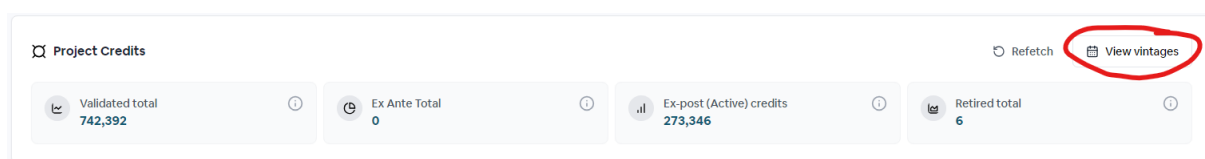
See further in ICR process requirements and ICR user guide and ICR definitions.

See:

ICR Process requirements

ICR registry user guide

ICR definitions

Changes from first to second assessment

ICR is constantly improving the registry platform and has made minor improvements to the platform since the last submission. ICR anticipates to release a bigger update on the registry platform in mid-august with improvements relating to credit actions and delivery, better details of public organizational accounts and credit inventory along with transactions table.

Changes since last submission

ICR has regularly released updates to the registry platform public platform and the backend of the registry. ICR recently released the Carbon Directory where stakeholders can have accounts and share information about their involvement in carbon markets, e.g. developers, marketplaces, insurance providers, rating agencies etc. ICR also released a site where all transactions with credits can be found, essentially aggregating credit actions on the database (Polygon blockchain) in a user-friendly format. This includes information about issuances, transfers, retirements, conversions, cancellations. the carbon directory sits outside the actual registry. The information is provided solely to highlight improvements made to public access to information about companies involved in the carbon space as well making information more accessible. No changes made to disclosure of credits other than general improvements.

Figure 2: Carbon Directory

Figure 3: Transactions table

3.5 Provide evidence that the registry has publicly available rules and procedures that include, at minimum, all account holders undertake and pass "know your customer" checks, and a description of how the registry operators guard against conflicts of interest.

The Terms and Conditions for both Users and Organizations on the ICR platform provide comprehensive information regarding Know Your Customer (KYC) and Know Your Business (KYB) requirements. Additionally, the ICR process requirements document outlines the procedures for KYC and KYB compliance. While ICR permits both users and organizations to maintain unverified status, this significantly limits their functionality within the platform. Specifically, no projects can be registered until the organization holding the account has completed KYB verification, and the authorized representative has undergone KYC verification. Detailed information on these requirements and procedures can be found at:

- Terms and Conditions
- ICR Process Requirements
- ICR user guide
- ICR registry

For KYC/KYB processes available in ICR QMS, ICR utilizes a third-party digital service provided by Taktikal, which is also employed for the facilitation of electronic signatures. This integration ensures a seamless and secure verification process for all users and organizations engaging with the ICR platform.
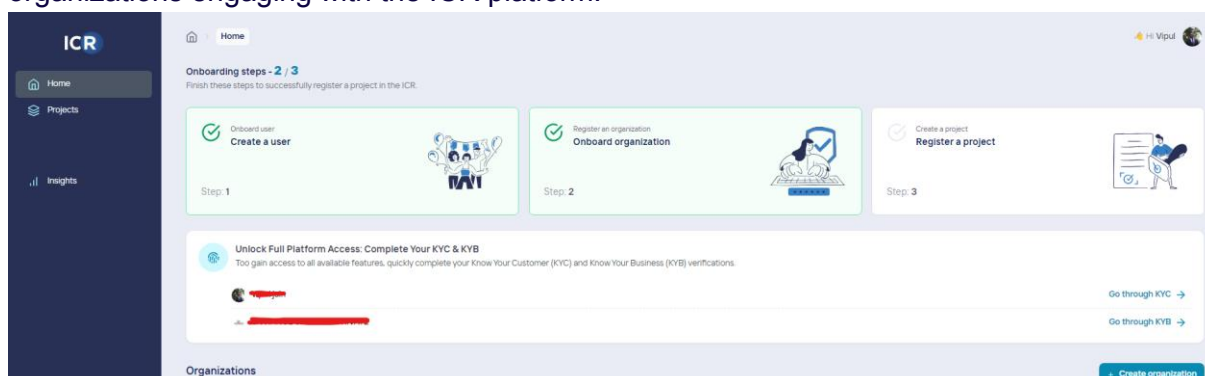
Figure 5: Onboarding new users/organizations and KYC/KYB process flow

Changes from first to second assessment
ICR has updated its Terms and conditions

Revised documentation:	Terms and conditions
Terms and conditions	All document
Link	ICR Terms and Conditions - Organizations	ICR Program (carbonregistry.com)

Changes since last submission

Revised documentation:	ICR process requirements
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

3.6 Provide evidence that registry functions, programme documents, and methodologies are available in English.

All documentation of the ICR is in English, as specifically addressed in the introduction to the ICR process requirements. Further from ICR documentation site all information is provided in English.

ICR program documentation site

ICR Process Requirements

Changes from first to second assessment
No changes

Changes since last submission
The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR process requirements
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

3.6.1 Confirm understanding that where the Assessor seeks evidence that is not available in English (i.e., when doing spot checks of project documents) ICROA may have to charge the Programme a fee to have the relevant document translated.

On the registry platform, users will encounter projects registered with ICR as well as those following the Icelandic Forest Carbon Code (FCC). The FCC is a GHG program for afforestation projects in Iceland, developed and managed by the Icelandic Forest Service a governmental institution that works with and for the government, but also the public and other interested parties, on the subjects of research, development, consultation and distribution of knowledge within forestry. It's important to note that documentation for FCC projects is primarily in Icelandic. The Chief Science Officer (CSO) of ICR serves on the board of the FCC, and a decision has been made to translate all FCC documentation into English to enhance accessibility. However, as of now, projects

registered under the Icelandic Forest Carbon Code remain documented in Icelandic and are not included within the scope of this application.

Changes from first to second assessment
No changes

Changes since last submission
No changes

4. Validation and Verification

4.1 Third-party validation and verification

4.1.1 Provide evidence that all projects are verified to a reasonable level of assurance as defined in ISO 14064-3

ICR has layers of documentation. Part relates to projects and part to validation and verification. ICR has specifications for VVBs to follow when validating projects and verifying mitigations. ICR validation and verification specifications have been developed with the structure of ISO 14064-3 in mind. All VVB shall follow ISO 14064-3 for validation for conformity to ISO 14064-2, but for requirements in the ICR requirement document, the ICR validation and verification specifications address ICR-specific requirements. Relating to the level of assurance of verification in ICR validation and verification specifications, you find in section 5.1.3.1 stipulation for a reasonable level of assurance.

See ICR program documentation under validation and verification.

Validation and verification

Changes from first to second assessment
No changes

Changes since last submission
ICR Validation and verification specifications have been updated to version 2.0

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR Validation and verification specifications
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

4.2 VVB Qualifications

4.2.1 Provide the list of approved VVBs and a link to where this is published on the Programme's website.

All VVBs ICR has made agreements with are listed in the registry. https://www.carbonregistry.com/explore/organizations?orgTypes=validationBody. Links to their accreditation and term can be found on each VVB profile. In addition information about projects they're involved, GHG emission mitigations validated and verified in is available publicly.

Changes since last submission
No changes

Changes since last submission
Now approved VVBs are listed under the Carbon Directory. Only approved VVBs are listed as a VVB on the Carbon Directory.

The Carbon Directory

4.2.2 Confirm the organisation has at least two organisations approved as VVBs, or an explanation of why not, if fewer than two are approved.

As of the submission date of this application, ICR has established agreements with 16 VVBs. Additionally, two more VVBs are currently under evaluation.
See list of VVBs.
https://www.carbonregistry.com/explore/organizations?orgTypes=validationBody

Changes since last submission
ICR has now 19 agreements with VVBs.

Changes since last submission
ICR now has agreements with 20 VVBs and 3 other VVBs are in the process of being approved as a VVB.

4.2.3 Provide evidence of the publicly available list of qualifications for VVBs that includes, at a minimum,
- **requirements that VVBs must be accredited under a relevant accreditation programme, such as ISO 14065, CDM/A6.4 Accreditation programme, etc.**
- **that VVBs may only perform validation and/or verification activities for the sectoral scope for which they have been accredited.**

Validation and verification bodies (VVBs) are eligible to provide validation and verification services under the ICR if they have signed an agreement with ICR and are accredited under an ICR approved GHG program and/or accredited under ISO 14065 by an accreditation body that is a member of the International Accreditation Forum (IAF).
The VVB shall hold such accreditation or approval for validation or verification (as applicable) for the sectoral scope(s) applicable to the project. Where the project falls

under more than one sectoral scope, the VVB shall hold accreditation or approval for validation or verification (as applicable) for all relevant sectoral scopes.

VVBs are eligible to conduct validation of methodology under the methodology approval process. The VVB shall hold accreditation for validation for the sectoral scope(s) applicable to the methodology. Where the methodology falls under more than one sectoral scope, the VVB shall hold accreditation for validation for all relevant sectoral scopes.

Information about eligibility of VVBs can be found throughout the ICR documentation. For example, in the ICR requirement document, ICR validation and verification section of the documentation page and finally in ICR validation and verification specifications.

The requirements are both for project validation and for methodology validation. See further

Validation and verification
ICR validation and verification specifications
ICR Requirement Document

Changes from first to second assessment
Approved GHG programs have been limited to CDM. As VVBs are accredited with other previously approved programs for ISO 14065 and referring specifically to Verra or GS is irrelevant.

Revised documentation:	ICR definitions
Paragraph	Approved GHG programs
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F0gbGbWJeIBh7nwissl0o%2FICR%20Definitions%20v3.0.pdf?alt=media&token=c0eb44ae-e7ab-4c13-89da-31aff203fd77

Changes since last submission

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR Validation and verification specifications
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-

	verification/criteria/icr-validation-and-verification-specifications-v2.0

Revised documentation:	ICR requirement document
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised documentation:	ICR definitions
Link	https://documentation.carbonregistry.com/documentation/icr-program/definitions/icr-definitions-v3.1

4.2.4 Describe how, and at what frequency, the Programme checks the qualifications of the Programme's approved VVBs against the list of requirements.

ICR's QMS procedures mandate that the ICR regularly confirm the accreditation status of its VVBs. To fulfill this requirement, ICR has conducted biannual checks to ensure ongoing compliance and accreditation status.

Furthermore, as part of its internal audit processes, an essential component involves assessing conformity with supplier criteria. This practice is aimed at maintaining high standards of quality and compliance within ICR's operations.

For more detailed information on the internal audit process and supplier management, refer to the specific procedures outlined in ICR's QMS.

ICR Internal audit (needs access)
ICR Supplier management (needs access)

Changes from first to second assessment

ICR has revised project review processes to check the status of accreditation of VVB during project review and issuance as seen in ICR process requirements and in internal procedures and processes. This is also addressed in ICR supplier management where regular checks on qualification of the VVBs are stipulated. Further see procedure for evaluation and managing VVB performance.

Revised documentation:	ICR - Procedure for Registration Approval of Projects at ICR
Paragraph	4.3
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-for-registration-approval-of-projects-at-icr

Revised documentation:	ICR Process - Monitoring and Verification
Paragraph	all document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/monitoring-and-verification

Revised documentation:	ICR Process Requirements
Paragraph	7.5 and 8.4
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2Fbqe4NxsXnn3q9ASFh3Ph%2FICR%20Process%20Requirements%20v6.0.pdf?alt=media&token=329f0281-b954-4672-b189-d9fe7382ba5a

Revised documentation:	ICR Process - Project review

Paragraph	All document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/registration/project-review

Revised documentation:	ICR Procedure - Supplier management
Paragraph	2, 3, 4
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-supplier-management

New documentation:	ICR - Procedure for Evaluating and Managing VVB Performance
Paragraph	all document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-supplier-management/icr-procedure-for-evaluating-and-managing-vvb-performance

Changes since last submission

The following documents have now been published after the public consultation and findings from the second assessment. Changes made to the referred sections are minimal, focusing on alignment and application of ICR definitions. See

Revised documentation:	ICR Process Requirements
Paragraph	7.5 and 8.4
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

4.2.5 If applicable, describe the rules that outline the scenarios when it is acceptable to have validation or verification completed by a qualified individual (sole proprietor). Describe what qualifications are required of the individual.

ICR does not permit individuals to perform validation or verification activities, as it is practically impossible for an individual to adhere to the requirements outlined in ISO 14064-3. Additionally, ICR mandates that all Validation and Verification Bodies (VVBs) must hold accreditation under CDM/6.4 or ISO 14065 standards, accreditations that cannot be obtained by individuals. This policy ensures that all validation and verification work is conducted to the highest standards of rigor and integrity, leveraging the expertise and resources of accredited organizations.

See criteria for eligibility for VVBs in ICR program.
Validation and verification
ICR validation and verification specifications
ICR Requirement Document

Changes from first to second assessment
No changes

Changes since last submission
The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR requirement document
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised documentation:	ICR validation and verification specifications
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

4.3 Programme Oversight of VVBs

4.3.1 Provide evidence of the publicly available procedure for providing oversight to VVBs that includes, at minimum:

- **Requirements for the VVB to prove independence from the Programme, market, and project.**
- **At least two individuals involved in validation and/or verification of each project (peer review)**
- **Minimum requirements for site visits are specified**
- **A rule on what number of sequential verifications are allowed before the project must be verified by a new VVB.**
- **Procedure for spot checks on quality of validation/verification reports, and mitigation plan**

Validation and Verification Bodies (VVBs) engaged in validation and verification activities are required to adhere to ISO 14064-3 standards and the specific validation and verification specifications set by ICR. Additionally, the structural integrity of VVBs is governed by ISO 14065, which outlines requirements for ensuring their impartiality in project validation and verification. These internal procedures and practices of VVBs are accredited by Accreditation Bodies (ABs), ensuring that VVBs maintain impartiality and independence from the programs, markets, and projects they evaluate.

ICR itself does not perform validation or verification as it is not accredited by an AB for such activities. The impartiality and independence required by ISO 14065/17029, and accredited by an AB that is a member of the International Accreditation Forum (IAF), are deemed sufficient for maintaining the necessary separation from the program, market, and projects.

In line with ISO 14064-3, validation and verification processes involve at least two individuals, ensuring an audit team is in place for each project, and all projects/mitigations undergo an independent review, as detailed in sections 5.2 and 8 of ISO 14064-3.

ISO 14064-3 also mandates on-site visits (sections 6.1.2.4, 6.1.4, 6.1.5, especially 6.1.4.2, 7.1.5, 7.1.6), and the ICR's validation specifications provide additional guidelines regarding site visits. ICR references IAF documentation for managing

remote on-site visits and extraordinary events, allowing VVBs to conduct remote assessments under certain conditions, which must be justified in a risk assessment and disclosed.

ICR currently does not impose a rule on the maximum number of sequential verifications by a single VVB before a new VVB must be engaged. Instead, ICR relies on the impartiality procedures of VVBs, which include rotating different auditors and/or independent reviewers to prevent conflicts of interest (COI) during the crediting period. As part of ICR's supplier management procedure and project review process, checks are made to ensure that VVBs have rotated auditors. Should there be concerns regarding compromised impartiality, ICR will take appropriate action. If ICR were to mandate rotation, it would focus on rotating auditors and independent reviewers rather than VVBs, as changing VVBs does not guarantee new individual auditors or reviewers for the project.

All publicly available information can be found in ISO 14064-3 and IAF MD and IF documents.
IAF MD 4
IAF MD 6
IAF ID 3
IAF ID 12

Changes from first to second assessment
ICR has revised documentation and included requirements for oversight of VVBs. In that all VVBs need to adhere to mandatory annual performance meetings with ICR and in the VVB agreement there's now included a statement from the VVB in impartiality of their services for conducting their services. ICR believes that setting a limitation on the number of verification of VVB is not sufficient to prevent the same individuals participating in audits. ICR trusts VVBs to manage their "rotation" of auditors and technical reviewers to prevent impartiality issues. In addition to this ICR has established a rule for maximum number of audits the audit team is involved with and the technical reviewer the same. This is specifically stipulated in a revised VVB agreement and in ICR validation and verification specifications. Processes and procedures for project registration have also been revised to support oversight of VVBs where, e.g. a review of validation/verification findings are included in the review.

ICR has expanded the project review processes and procedures to address oversight of quality of assessments. In addition ICR has now included mandatory performance meetings with VVBs as stipulated in VVB agreements and ICR validation and verification specifications.

ICR has implemented in the completeness review issuance of a review report where the PDD/MR and ValR/VerR are compared for consistency and feedback from ICR provided. ICR has in the VVB agreement v6.0 made participation in the VVB forum mandatory.

ICR has expanded the onboarding process of VVBs. It now includes sharing an agenda for onboarding meetings and during the meeting the principles that ICR is built on are discussed in detail.

ICR has expanded its supplier management procedure with a procedure on evaluation and management of VVB performance which includes ongoing monitoring and annual meetings to discuss performance of the VVB.

In ICR process requirements ICR has clarified details on assessment of conformity that can entail a random check or initiate an assessment due to concerns raised.

Revised documentation:	VVB Agreement
Paragraph	2.3, 3.3
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/7.-support/7.5-documented-information/documents#agreements

Revised documentation:	ICR validation and verification specifications
Paragraph	5.2, 8, 12.1, 12.2
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FvJS5GWjMIyUpq2GnvDZt%2FICR%20validation%20and%20verification%20specifications%20v2.0.pdf?alt=media&token=937f71e3-f91e-41bd-967d-4b1ebde339a0

Revised documentation:	ICR Process requirements
Paragraph	13
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2Fbqe4NxsXnn3q9ASFh3Ph%2FICR%20Process%20Requirements%20v6.0.pdf?alt=media&token=329f0281-b954-4672-b189-d9fe7382ba5a

Revised documentation:	ICR Process - Validation and verification body approval
Paragraph	3
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/validation-and-verification-body-approval

Revised documentation:	ICR Procedure - Supplier management
Paragraph	2, 3, 4
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-supplier-management

Revised documentation:	ICR Process - Monitoring and Verification
Paragraph	all document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/monitoring-and-verification

Revised documentation:	ICR Process - Project review
Paragraph	All document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/registration/project-review

Changes since last submission

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR validation and verification specifications
Paragraph	5.2, 8, 12.1, 12.2
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

Revised documentation:	ICR Process requirements
Paragraph	13
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

4.3.2 Provide evidence that the procedure described in Section 4.3.1 is being followed.

The validation and verification report template adheres to the structure prescribed by ISO 14064-3, ensuring that all site visits are comprehensively documented within the validation and verification reports. During ICR's review process, every piece of documentation is meticulously examined. Should any observations arise from this

review, the responsible Validation and Verification Body (VVB) is prompted to address these observations with appropriate responses, maintaining the integrity and thoroughness of the validation and verification process.

See for ICR validation, verification and joint validation and verification templates.

[Validation report (ValR)](#)
[Verification report (VerR)](#)
[Validation and verification report](#)
[ICR registry](#)

Changes from first to second assessment
Please see recently approved projects, especially see ICR review reports.
https://www.carbonregistry.com/explore/projects/rahima-bay-sustainable-190
https://www.carbonregistry.com/explore/projects/dammam-drt-sustainable-137
https://www.carbonregistry.com/explore/projects/agroecologyitaly-reducing-ghg-48?tab=documents

In addition, ICR has developed a review report template for the ICR review.

New document:	ICR review report template
Paragraph	documents listed
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-for-registration-approval-of-projects-at-icr

Changes since last submission
More projects have completed registration and review reports can be found under each project's documentation.

[Carbon Registry | Projects Overview](#)

4.3.3 Describe the capacity building support the Programme provides to the VVBs, including onboarding, training, and explanations of what the VVB must look at when completing validations and verifications.

When onboarding new Validation and Verification Bodies (VVBs), ICR facilitates an introductory meeting to acquaint them with the program's framework, the criteria for validation and verification, and the specific requirements of the ICR. This session provides a comprehensive overview to ensure VVBs are well-informed about their roles and responsibilities within the program.

Throughout the assessment processes, VVBs may encounter instances requiring clarification on certain aspects. In these situations, they are encouraged to reach out to ICR, which promptly provides the necessary clarifications to support the VVBs' activities.

Moreover, ICR has crafted detailed specifications for validation and verification to address areas where ISO 14064-3 might not provide sufficient guidance on assessing compliance with ICR program-related requirements. These specifications are designed to ensure clarity and consistency in the application of standards across all validations and verifications conducted within the ICR framework and a communication channel with ICR relating to further clarifications .

ICR has recently established a VVB forum. The objectives of the ICR VVB Forum are as follows:
▪ Collaborative Exchange: To provide a platform for VVBs to exchange experiences, insights, and expertise in validation and verification.
▪ Joint Improvement: To collaborate on initiatives that contribute to improving validation and verification practices and the ICR Program.
▪ Informed Awareness: To stay informed about developments, standards, and guidelines in the field of validation and verification.
▪ Credibility Enhancement: To enhance the consistency and reliability of validation and verification activities conducted by VVBs.
▪ Mission Support: To support the mission of the ICR in promoting accountability and transparency.

Forum meetings shall be held quarterly but in addition to scheduled meetings ICR has communication channels for forum members to engage and access updates. See further:

Validation and verification

ICR validation and verification specifications

VVB forum

Changes from first to second assessment
ICR has revised documentation and included requirements for oversight of VVBs. In that all VVBs need to adhere to mandatory annual performance meetings with ICR and in the VVB agreement there's now included a statement from the VVB in impartiality of their services for conducting their services.

ICR has expanded the onboarding process of VVBs. It now includes sharing an agenda for onboarding meetings and during the meeting the principles that ICR is built on are discussed in detail.

ICR has expanded its supplier management procedure with a procedure on evaluation and management of VVB performance which includes ongoing monitoring and annual meetings to discuss performance of the VVB.

ICR has revised ICR validation and verification specifications including details on training and oversight of the VVB.

New document:	See revised documentation in section 4.3.2, 4.3.1.
Paragraph	See revised documentation in section 4.3.2, 4.3.1
Link	See revised documentation in section 4.3.2, 4.3.1

Changes since last submission
The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR validation and verification specifications
Paragraph	4.3.2, 4.3.1.
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

4.3.4 Provide evidence of the procedure that ensures VVBs operate to the spirit of the Standard and projects are working towards the goals of the Programme.

Addressing this query necessitates a focus on the core principles embedded within the ISO 17029/14065 accreditation standards. These principles are foundational to ensuring the integrity, transparency, and reliability of the accreditation process. By adhering to these standards, organizations commit to upholding high levels of impartiality, competence, and consistency in their operations. The ISO 17029/14065 framework emphasizes the importance of a systematic approach to quality management, ensuring that all activities are conducted with a commitment to excellence and continuous improvement. Engaging with these principles not only enhances the credibility of the accreditation but also reinforces the trust stakeholders place in their capabilities to deliver services that meet or exceed the established international benchmarks.

Principles of standards establishes the overall mission of the standard. From ISO 17029 in section 4.

4.1 General

4.1.1 The principles described in this clause provide the basis for the requirements specified in this document. These principles should be applied as guidance for decisions that sometimes need to be made for unanticipated situations. Principles are not requirements.

4.1.2 The overall aim of validation/verification is to give confidence to all parties that a validated/ verified claim fulfils the specified requirements. The value of validation/verification is the confidence that is established by an impartial evaluation by a competent validation/verification body.

4.1.3 Parties that have an interest in validation/verification include, but are not limited to:

a) clients of the validation/verification bodies;

b) programme owners;

c) users of the validated/verified claims;

d) regulatory authorities.

4.2 Principles for the validation/verification process

4.2.1 Evidence-based approach to decision making

The process deploys a method for reaching reliable and reproducible validation/verification conclusions and is based on sufficient and appropriate objective evidence. The validation/verification statement is based on evidence collected through an objective validation/verification of the claim.

4.2.2 Documentation

The validation/verification process is documented and establishes the basis for the conclusion and decision regarding conformity of the claim with the specified requirements.

4.2.3 Fair presentation

Validation/verification activities, findings, conclusions and statements, including significant obstacles encountered during the process, as well as unresolved, diverging views between the validation/ verification body and the client are truthfully and accurately reflected.

4.3 Principles for validation/verification bodies

4.3.1 Impartiality

Decisions are based on objective evidence obtained through the validation/verification process and are not influenced by other interests or parties.

Threats to impartiality can include but are not limited to the following.

a) Self-interest: threats that arise from a person or body acting in their own interest. A concern related to validation/verification, as a threat to impartiality, is financial self-interest.

b) Self-review: threats that arise from a person or body reviewing the work done by themselves.

c) Familiarity (or trust) : threats that arise from a person or body being too familiar with or trusting of another person instead of seeking evidence for validation/verification body, and not the validation/verification body, has the

responsibility for the claim and its conformity with the applicable specified requirements. The validation/verification body has the responsibility to base a validation/verification statement upon sufficient and appropriate objective evidence.

4.3.6 Responsiveness to complaints

Parties that have an interest in validation/verification have the opportunity to make complaints. These complaints are appropriately managed and resolved.

Responsiveness to complaints is necessary in order to demonstrate integrity and credibility to all users of validation/verification outcomes.

4.3.7 Risk-based approach

Validation/verification bodies need to take into account the risks associated with providing competent, consistent and impartial validation/verification. Risks can include, but are not limited to, those

associated with:

a) the objectives of the validation/verification and the programme requirements;

b) competence, consistency and real as well as perceived impartiality;

c) legal, regulatory and liability issues;

d) the client organization, where validation/verification is being carried out, and its management system, operating environment, geographic location, etc.;

e) the susceptibility of any parameter included in the claim to generate a material misstatement, even if there is a control system implemented;

f) the level of assurance to be achieved and the corresponding evidence-gathering used in the validation/verification process;

g) perception of interested parties;

h) misleading claims or misuse of marks by the client;

i) risk control and opportunities for improvement.

And from ISO 14065

4.4 Conservativeness

When the body assesses comparable alternatives, preference is given to the alternative that is cautiously moderate.

4.5 Professional scepticism

Attitude based on recognition of the potential circumstances able to cause material misstatements in an environmental information statement.

NOTE ISO 14066:2011, Annex A, provides guidance on evidence and the application of professional scepticism. This annex applies equally to the validation and verification of all environmental information.

The ICR requirements document reflects the principles as delineated in section 2, closely aligning with the rigorous standards of ISO 14065. ABs conduct periodic audits of VVBs to ensure adherence to their established procedures and the fundamental principles of ISO 14065, such as impartiality, competence, and consistency.

All VVBs collaborating with ICR maintain their accreditation status with their respective ABs, underscoring their ongoing compliance with the high standards set forth by international accreditation guidelines. This continued accreditation is a testament to the VVBs' commitment to quality and integrity in their operations.

See further
ISO 14064-3
ISO 17029
ISO 14065
IAF MD6
ICR requirement document (principles)

Changes from first to second assessment

Please consider section 4.3.1 - 4.3.3.

Changes since last submission

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR requirement document
Paragraph	4
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

5. Carbon Crediting Principles

5.1 Unique

5.1.1 Provide evidence of the procedure in place that ensures carbon credits are not double counted.

Double counting, claiming and issuance are specifically defined in ICR definitions. See ICR definitions in ICR program documentation page.

Double claiming means when the same GHG emission mitigation outcome is claimed by two different parties towards achieving its targets, e.g., once by the country in which the mitigation outcome occurs, and once by the party using a carbon credit.

Double counting means when GHG emission mitigation outcome is counted more than once. Double counting can occur through double issuance, double use, and/or double claiming.

Double issuance means when more than one carbon credit is issued for the same mitigation outcome, e.g., when the same mitigation activity is registered under two different crediting standards.

Double use means when the same instrument is counted twice towards achieving climate change objectives, e.g., if a party uses the same instrument to meet two different objectives.

In ICR requirements document double counting is addressed in section 3.8.

Projects registered with ICR shall not issue instruments for the same GHG emission mitigations with another GHG program or scheme, e.g. renewable energy certificates. Projects registered with other GHG programs may apply for transfer registration to ICR or be jointly registered. When registering with ICR, all previous documentation regarding the project activities shall be made available for ICR and the VVB and the project shall complete a gap validation. The project shall not issue ICCs for the same monitoring period as issued in

the corresponding GHG program or scheme. The ICR process requirements discuss requirements for transitioning from other GHG programs.

If the project boundary overlaps with a project of a similar nature registered with the ICR program or another GHG program, the project proponent shall demonstrate that there is no double counting of impacts.

The project proponent shall not account for any GHG emission mitigations resulting for the project activities for any ICCs retired by another organization for their own GHG reporting.

The project proponent shall report the baseline emissions, but may report separately on any instruments issued from the project activities. If the project proponent wants to report publicly actual GHG emissions he shall retire ICCs if they want report and account for the benefit associated with the project implementation.

Where GHG emission mitigations will be used for reporting purposes under the accounting rules set out by the Paris Agreement or other emission trading programs (such as CORSIA) operating under the accounting framework of the Paris Agreement (international trading), they shall conform to all relevant requirements of that market, including measures to prevent double claiming, i.e. corresponding adjustment. Project proponents shall provide evidence that the GHG emission mitigations generated by their project, and used for reporting, have fully conformed (or will conform) with all

relevant market requirements. This evidence shall be utilized to designate ICCs that meet the specific market criteria.
Requirements for projects to secure a label representing its benefits, are set out in ICR process requirements.

Further for host-country attestation section 3.10 addresses requirements for host-country attestation.
Projects that intend to be eligible for international trading shall obtain and submit a letter of assurance and authorization from the national authorized entity of the host country or countries where the emission mitigations occur, for corresponding adjustment. The project proponent shall use, or rely on the ICR letter of assurance template. See further second last paragraph of section 3.8

In the context of the Paris Agreement, where all participating countries are subject to obligations, double counting presents a challenge. To fully mitigate the risk of double counting, it is imperative that all projects receive host country approval. ICR recognizes that double claiming can be considered acceptable, provided that the claiming organization transparently discloses that the impacts being claimed are intended to support the host country's Nationally Determined Contribution (NDC). This approach ensures that while contributions to emission reductions are recognized, they are also aligned with the host country's climate action commitments, maintaining the integrity of global efforts to combat climate change.

Offsetting claims standards such as ISO 14068-1:2023 issued by ISO and ÍST 92:2022 Carbon offsetting, issued by Icelandic Standards Organization, addresses claims by organizations for example with requirements such as:

5.2.5 Claims
Organizations should disclose the nature of their compensation claims. Claims may be
1) supporting the NDC of host-country of the GHG project, i.e., non ITMO.
2) Supporting the NDC of the organizations domicile i.e., ITMO, or
3) not supporting NDCs when organizations voluntarily retire ITMO credits or
4) supporting GHG project implementations and credits generated lie outside of the scope of the host-country NDC.

See further
ICR requirement document
ÍST 92:2022
Compensation

Changes from first to second assessment
To further expand on processes on double counting under section 5.8 (previously 3.8) of the ICR requirement document ICR has provided further guidance in the ICR validation and verification specifications on assessment of double counting. ICR has also published a new document, ICR Article 6.2 procedures, which relate to procedures ICR has developed to address any double claim for credits under international transfers (ITMOs) requiring corresponding adjustments. This is also included in revised processes and procedures.

New document:	ICR Article 6.2 procedures
Paragraph	all document
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FWzTYTKFpG8E6YIMKSWIu%2FICR%20Article%206-2%20procedures%20v1.0.pdf?alt=media&token=4c4bd28c-9939-49b0-b850-472715d83f8c

Revised document	ICR validation and verification specifications
Paragraph	6.1.3.6.5
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FvJS5GWjMIyUpq2GnvDZt%2FICR%20validation%20and%20verification%20specifications%20v2.0.pdf?alt=media&token=937f71e3-f91e-41bd-967d-4b1ebde339a0

Revised document	ICR Process - Project review
Paragraph	all document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/registration/project-review

Revised document	ICR Process - Monitoring and verification
Paragraph	all document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/registration/monitoring-and-verification

Revised document	ICR - Procedure for Registration Approval of Projects at ICR
Paragraph	all document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-for-registration-approval-of-projects-at-icr

Changes since last submission

The following documents have now been published after the public consultation and findings from the second assessment. This change only relates to guiding where to find the information from public consultation ICR process requirements after the completion of the public consultation. Changes made are mainly formatting and application of ICR definitions. See spaces/fIdoGcZZdvap67xjb5h1/uploads/79I0wP15Ibebva9KFjLw/ICR validation and verification specifications v2.0 After PC comments.pdf and spaces/fIdoGcZZdvap67xjb5h1/uploads/ieu0U3zJmlODSexExGbJ/ICR Article 6-2 procedures v1.0 After PC.pdf

New document:	ICR Article 6.2 procedures

Paragraph	all document
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-article-6-2-procedures-v1.0

Revised document	ICR validation and verification specifications
Paragraph	6.1.3.6.5
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

5.2 Real

5.2.1 Provide evidence that carbon credits are measured, monitored, and verified ex-post. Identify any methodologies under the Programme that issue carbon credits ex-ante.

ICR allows both issuances of ICCs ex-ante and verified ex-post. ICR does not identify specific methodologies that projects need to follow to issue ex-ante but rather relates to level of additionality of the project involved. See further benchmarking of additionality or insurance cover of the project involved in the ICR requirement document. Non-performance risk is evident in all ex-ante issuances, therefore ICR requires projects to deposit to an adjustment account for all ex-ante issuances or they have insurance policy that covers any non-performance event. This requirement ensures that there is a mechanism in place to compensate for any shortfall in the delivery of the promised emission reductions, thereby maintaining the credibility and integrity of the credits issued.

ICR acknowledges the importance of early funding projects to minimize associated costs, access to funding, and the possibility of quickly scaling climate methodologies/projects. Therefore, project proponents can issue ICCs after projects have been validated and before GHG emission mitigation outcomes have been verified, subject to limitations as further discussed in the ICR requirement document. This may ease funding, facilitate climate actions, scale climate actions, and provide market visibility and credibility to climate projects. Note that ICCs are issued based on validated estimation of GHG emissions mitigation outcomes. Ex-ante ICCs cannot be retired until verified and exchanged for ex-post ICCs.
Issuance is allowed for projects where mitigations have not been verified, i.e., pre-monitoring and verification if they meet additionality level 4b or have insurance cover

or warranty to compensate for any non-performance of the projects. Meeting level 4b allows issuing up to 50% of validated GHG emission mitigation for each vintage for the crediting period, notwithstanding ICCs demarcated for adjustment account(s). Projects with insurance cover or warranty may issue ex-ante ICCs up to 100% of the validated GHG emission mitigations.

Ex-ante and ex-post ICCs differ primarily in terms of the timing of the realization of the GHG emission mitigations activities they represent:

- ***Ex-ante ICCs** are issued based on projected or expected GHG emission mitigations that will occur in the future. They are issued before the actual impacts, based on predictive calculations or models of the project's expected impact. Ex-ante ICCs become ex-post ICCs subject to successful verification of impacts.*
- ***Ex-post ICCs** are issued after the GHG emission mitigations have occurred and been verified. These credits represent real, measurable GHG emission mitigations that have been achieved and verified, confirming the project's actual impact.*
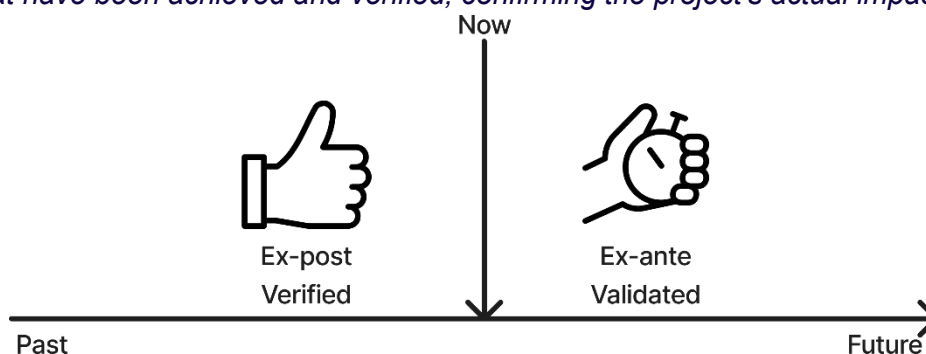
Figure 6: Ex-post vs. ex-ante.

Issuance of ICCs, either ex-ante or ex-post may generally be described according to the following diagram.

Figure 7: Ex-ante ICC issuance.

Figure 8: Ex-post ICC issuance.

Ex-ante issuance refers to the issuance of ICCs before impacts, and ex-post issuance refers to issuance after verification of real impacts. Ex-ante ICCs have vintages in the future, but ex-post vintages in the past.

Issuances are either pre-monitoring (ex-ante) or post-verification (ex-post). The ICR registry displays the status of every ICC that has been issued. ICR allows projects that have been validated to issue ex-ante ICCs. ICCs may have a different status that represents the attribute of the credit. ICCs may be inactive (ex-ante), active (ex-post), retired, or cancelled. Please refer to ICR definitions for detailed definitions on different

statuses. The project proponent may request partial or complete issuance of ICCs in the registry, subject to limitations. See section 3.4 in the ICR requirement document.

All projects registered with ICR undergo rigorous processes of monitoring, quantification (both ex-ante and ex-post), and verification to ensure the authenticity and impact of reported emission reductions. These procedures are firmly grounded in the standards set by ISO 14064-2, reinforced by the ICR requirements document, and further elaborated within the ICR process requirements.

Specifically, the ICR process requirements outline the protocols for monitoring and verification, ensuring that projects consistently measure their impact against established benchmarks and verify the actual environmental benefits achieved. This comprehensive approach to project oversight guarantees that all activities not only aim for but also demonstrate tangible contributions to climate change mitigation, aligning with both international standards and ICR's commitment to transparency and integrity in carbon accounting.

For example, in the ICR process requirements where monitoring and verification are stipulated.

During the project's operation, the GHG emission mitigations shall be monitored according to the monitoring plan and reported in a monitoring report. Any deviations from the monitoring plan shall be addressed and justified in the monitoring report.
If a deviation has been made to the project design description, a revised project design description shall be issued and uploaded to the registry as a public document, along with an updated validation report.
When a VVB has been contracted, the project proponent shall submit a verification agreement and verification plan to the registry. Further, the proponent shall select the contracted VVB from the registry platform.
Proponents shall select the monitoring period and monitored GHG emission mitigations when they submit monitoring reports. An admin shall submit the monitoring report and request review. See the ICR user guide.

And on verification

After monitoring, the GHG emission mitigation shall be verified by an approved VVB to be eligible for issuance of ex-post ICCs. If ICCs have been issued ex-ante, verification is mandatory to activate ex-ante credits.

When GHG emission mitigation outcomes have been monitored according to the monitoring plan and verified by the VVB, ex-post ICCs may be issued, and ICCs may be activated; see section 4.3.

Criteria for verification, including requirements for VVB, are set out in the ICR requirement document. Further guidance and specifications on validation and verification may be found in ICR validation and verification specifications. Projects must complete verification before requesting issuance of ex-post ICCs. The process for requesting issuance of ICCs post-monitoring is discussed under section 4.3. The

proponent shall identify the relevant criteria for verification in the registry platform. See the ICR user guide.

When the proponent has contracted a VVB for verification, the VVB is selected in the registry platform that will conduct the verification of the GHG emission mitigations. When the VVB has been selected, he will have access to all information relevant to the project on the registry platform. See further in the ICR user guide.

The VVB shall review if the information in the project registration aligns with the documentation. Further, assess any images or insights the project proponent publicly shares that relate to the project activities.

Project proponents shall submit documentation to the VVB according to VVB's request. The VVB assesses the monitoring and accompanying evidence of conformity to the verification criteria.

The VVB submits findings to the project proponent with findings and requests for corrective actions as applicable.

If applicable, the project proponent responds to the requests for corrective actions, and the VVB assesses any measures taken.

The VVB submits the final verification report with findings to the project proponent and uploads it to the registry platform.

The project proponent shall indicate the monitoring period in the registry and review that all relevant and necessary documentation has been uploaded to the registry and that relevant documents are available for public access.
1. *Updated project design description (if applicable),*
2. *New validation report (if applicable),*
3. *Monitoring report,*
4. *Verification report,*
and the following documents are private
a) *Validation plan (if applicable)*
b) *Verification plan*
c) *Verification agreement.*

ICR reviews the request to ensure all documents are complete and signed where necessary. An eligible VVB has conducted the verification, instruments have not been issued under another GHG program (or been cancelled as appropriate) for the same GHG emission mitigation, and appropriate information is included in all documentation. The VVB holds the necessary accreditation, and the competence of the audit team is appropriate. Further, to check if the newest versions of methodologies or tools have been applied and all information provided in the registry platform is consistent with the project documentation.

When the verification has been confirmed, ICCs are minted and delivered to the ICR holding account. The supply of verified ex-post ICCs for the monitoring period is provided on-chain. Ex-ante ICCs issued are activated corresponding to ex-ante ICCs

that have been transferred to other accounts within the ICR registry and ICCs sitting on adjustment accounts.
The project proponent may issue ICCs according to monitoring findings as stated in the monitoring report and verified according to the verification report, see section 4.3.

See further ICR requirement document and the ICR process requirements.
https://documentation.carbonregistry.com/documentation/icr-program/criteria/icr-requirement-document-v5.0#ref106803444
https://documentation.carbonregistry.com/documentation/icr-program/criteria/icr-requirement-document-v5.0#toc147747511
https://documentation.carbonregistry.com/documentation/icr-program/procedures/icr-process-requirements-v5.0#toc158103547
https://documentation.carbonregistry.com/documentation/icr-program/procedures/icr-process-requirements-v5.0#ref158068307
Also further in ICR requirement document.

Changes from first to second assessment
It is important to note the functional differences between ex-ante ICCs and es-post ICCs. Ex-ante ICCs do not represent real impact until they have been exchanged for an ex-post subject to monitoring and verification. The role of ex-ante ICCs is to allow projects to transfer validated estimation of the GHG emission mitigations from the project activities.

ICR has updated ICR Terms and conditions to avoid ambiguity of the difference of the two.

ICR has revised the ICR requirement document and ICR process requirements to define further terms of ex-ante insurance policy and the insurance company. ICR has started working with Kita which will provide service for buffer risk management to safeguard compensation of non-performance events from the ICR adjustment account. Further to this for clarification, section 8.6 in the ICR process requirements addresses how non-performance events are dealt with.
Insurance claims can be paid in either financial or 'in-kind' compensation. For insurance claims paid 'in-kind', the process to ensure suitable fungibility with ICROA endorsement criteria is as follows: The insurer must provide to ICR a clear procedural and governance framework outlining how they will source and assess replacement carbon credits, including "required" and "comparison" attributes of replacement carbon credits. Required attributes must include "credits from ICROA-endorsed standards". Any changes to the framework and/or list of "required" and "comparison" attributes must be documented with appropriate procedures as part of a legally binding contract with the insured party, and in discussion with ICR. The insurer must demonstrate a suitable mechanism such that the financial compensation or in-kind compensation can address equivalent value for credits to be sourced.

ICR has also published a new document, ICR Article 6.2 procedures, which relate to procedures ICR has developed to address any compensation due to double claims for credits under international transfers (ITMOs) requiring corresponding adjustments.

Revised document:	ICR Terms and conditions
Paragraph	10.6
Link	https://documentation.carbonregistry.com/documentation/icr-program/terms-and-conditions/terms-and-conditions-organizations

Revised document:	ICR requirement document
Paragraph	5.4, 5.5, appendix II
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F5ecDWFW3LcUpu819e8RO%2FICR%20Requirement%20Document%20v6.0.pdf?alt=media&token=3518c344-0e0e-4079-8bc8-89029523163d

Revised document:	ICR process requirements
Paragraph	8.2, 8.3, 8.5
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2Fbqe4NxsXnn3q9ASFh3Ph%2FICR%20Process%20Requirements%20v6.0.pdf?alt=media&token=329f0281-b954-4672-b189-d9fe7382ba5a

New document:	ICR Article 6.2 procedures
Paragraph	3, II.3, V

Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FWzTYTKFpG8E6YIMKSWIu%2FICR%20Article%206-2%20procedures%20v1.0.pdf?alt=media&token=4c4bd28c-9939-49b0-b850-472715d83f8c

Changes since last submission

In the last assessment there was uncertainty by ICROA relating to ex-ante issuances and transactions further that the purpose of adjustment accounts were unclear. ICR has in that regard made certain adjustments in the final version of the ICR definitions, ICR requirement document and ICR process requirements.

Ex-ante ICCs are preliminary credits representing estimated future emissions reductions. Although they can be transacted, ICR has safeguards to address potential risks associated with these transactions.

Ex-ante ICCs reflect anticipated emissions reductions but do not represent verified climate impact yet. Only after monitoring and verification ex-ante ICCs can be converted to ex-post ICCs, which confirm actual emissions reductions.

While an ex-ante ICC is transferable, it cannot be retired. This is outlined in the instrument's definition and terms and conditions. Only after monitoring and verification and review by ICR are ex-post ICCs issued, automatically replacing the ex-ante ICCs through the registry system.

The primary role of ex-ante ICC is for accounting purposes, with the main goal being to enhance transparency. These instruments enable sellers to transfer validated estimates of future GHG emission mitigations from project activities, providing a mechanism for projects to secure funding based on projected climate benefits. This ensures both transparency and accountability regarding the eventual delivery of these future benefits. The key purpose is to clarify the status of the credit, preventing buyers from claiming or appearing to claim climate benefits or offsets prematurely, while facilitating transactions and improving transparency, such as in offtake arrangements and is publicly auditable both on the ICR registry and on public blockchain ledger. Further to clarify the purpose of the ICR non-performance adjustment account is akin to that of a traditional buffer account, with the key difference being that a traditional buffer account deals exclusively with ex-post credits, which have been verified after the emission mitigation activities have occurred. In contrast, ex-ante credits are based on validated estimations of future GHG emission reductions, not yet verified.

Given the differing risk profiles between expected (ex-ante) and verified (ex-post) GHG emission mitigation outcomes, the non-performance adjustment account functions as an additional layer of "insurance" for those purchasing ex-ante credits. The account is populated during issuance of ex-ante ICC instruments but in time when vintages are verified the ex-ante ICC instruments are replaced with ex-post ICCs. Only ex-post ICCs on ICR non-performance adjustment account are eligible to compensate

for non-performance events. Should there be a need to make adjustments (compensate) due to non-performance of a project, the adjustment account will compensate for such events when the proponent fails to do so, or no insurance has been purchased. This mechanism has been explained in detail in the ICR process requirements also with an example in appendix. Its purpose is to mitigate the risk of non-delivery of real impacts in case of non-performance. Depositing ex-ante ICCs to the account provides additional transparency of risk measures in place and clarity of future ex-post ICCs on the account.

Since the public consultation the documentation has been improved and clarified when discussing ex-ante instruments representing validated forecasted GHG emission mitigations and when discussing ex-post ICCs, representing real GHG emission mitigations. Further clarifying the process in further details on safeguards that are in place to guarantee compensation for any non-performance events in form of cancellation of ex-post carbon credits or exercising any insurance policy.

ICR definitions

1. Definition of "activation" has been replaced with "conversion", meaning that any ex-ante ICCs are not activated but they're essentially converted to ex-post ICCs post monitoring and verification.

2. Ex-ante and ex-post have specifically been defined for clear understanding what ex-ante and ex-post mean and prevent any misunderstanding.

ICR requirement document

1. In section 5.4 clearer wording has been provided on conversion of ex-ante ICCs to ex-post ICCs, hence modified definition on "activation". Same clarification has been added to section 8.2. For insurance policies any compensation by the insurance provider shall be in kind, not in cash.

ICR process requirements

1. In section 7.2.2 ICR has made clear that post validation issuances of ex-ante instruments limits to ex-ante ICCs and further outlined that such instruments cannot be used to support any offsetting claim. In addition to that references made to safeguards that ICR has in place to guarantee compensation of any non-performance events discussed details under section 8.5.1.1.

2. Section 7.7 references made specifically to ex-ante ICCs added and conversion of such instruments to ex-post ICCs.

3. In section 8 a table has been added to summarize the difference between ex-ante ICCs and ex-post ICCs.

	Ex-ante ICCs	*Ex-post ICCs*
Definition	ICCs that have been issued in the *ICR registry* from a registered project that an *approved VVB* has	ICCs that have been verified that *GHG emission mitigations* are real and can be used for offsetting

	validated. *Ex-ante ICCs* can't be retired.	emissions or for other environmental *claims*.
Issued on carbonregistry.com	Yes – after validation, subject to limitations and safeguards	Yes – after *verification*
Transferrable	Yes – can be transferred to buyer's *account* on the *ICR registry*.	Yes – can be transferred to buyer's *account* on the *ICR registry*.
Retirable	No	Yes
Cancellable	Yes – if ex-ante ICCs have not been transferred from proponent	Yes
Convertible	Yes – subject to *verification ex-ante ICCs* are converted to *ex-post ICCs*.	No

4. Section 8.2 has been amended with further clarification about the purpose of ex-ante ICCs and disclaimer further added to clarify the limitation of ex-ante ICCs that they don't represent real GHG emission mitigations. Added clarification that ex-ante ICC issuances are subject to deductions for deposit to non-performance adjustment account and that the deductions are based on risk assessment conducted by ICR. Deduction limits range from 2-10%.

5. Section 8.2.1 has been updated for further clarification and application of ex-ante and ex-post definitions.

6. Section 8.5 on adjustments has been updated, now stipulating specifically that only ex-post ICCs on ICR non-performance adjustment accounts are eligible to compensate for non-performance events.

7. Section 8.5.1 has been updated for clarifications and that conversions of ex-ante ICCs have precedence for conversion.

8. Section 8.5.1.1 has been updated to further clarify the process of reporting non-performance events and how such events are compensated for.

9. Section 8.5.2 has been updated to clarify that ex-ante ICCs subject to permanence risk shall be deposited to non-permanence adjustment account. Such ex-ante ICCs are not eligible to compensate for any non-permanence events until they have been converted to ex-post ICCs.

10. An appendix has been added to demonstrate with practical examples how the compensation mechanism works for non-performance events.

In addition to the clarification on the functional differences in ex-ante ICCs and ex-post ICCs, to the best of ICR's knowledge according to GHG program documentation and procedures, the following GHG programs allow issuances and transactions with ex-ante instruments have previously been endorsed by ICROA,

1. City Forest Carbon (CFC)

City Forest Credits (CFC) has been approved solely for ex-post credits. According to an ICROA press release, ex-ante credits are not endorsed and are ineligible for use by ICROA-accredited organizations. Currently, there is no publicly available information indicating any exceptions to this exclusion on ICROA's list of endorsed organizations. https://icroa.org/endorsed-organisations/

2. Plan Vivo

Plan vivo issues ex-ante instruments as seen under https://www.planvivo.org/crediting-systems-monitoring, https://mer.markit.com/br-reg/public/index.jsp?entity=issuance&srd=false&sort=account_name&dir=ASC&start=0&entity_domain=Markit&additionalCertificationId=&acronym=PV&standardId=100000000000004&categoryId=100000000000001&unitClass= No information about available of any limitation of scope of endorsement relating to ex-ante instruments.

3. Riverse

Rieverse issues provisional credits (ex-ante), see Riverse Standard Rules v6.0 https://app-na1.hubspotdocuments.com/documents/20406207/view/698712837?accessId=128f19. No information about limitation of scope of endorsement relating to ex-ante instruments

4. Woodland Carbon Code (WCC)[1]

WCC issues pending issuance units (ex-ante), see WCC Validation section 4 "Updating the registry and receiving Pending Issuance Units" https://www.woodlandcarboncode.org.uk/landowners-apply/3-validation-initial-project-check and https://mer.markit.com/br-reg/public/index.jsp?entity=project&sort=&dir=ASC&start=0&acronym=WCC&limit=15&additionalCertificationId=&categoryId=100000000000001&name=&standardId=100000000000042. No information about limitation of scope of endorsement relating to ex-ante instruments.

The following documents have now been published after the public consultation and findings from the second assessment.

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[1] WCC issues pending issuance units (ex-ante), see WCC Validation section 4 *"Updating the registry and receiving Pending Issuance Units"* https://www.woodlandcarboncode.org.uk/landowners-apply/3-validation-initial-project-check and https://mer.markit.com/br-reg/public/index.jsp?entity=project&sort=&dir=ASC&start=0&acronym=WCC&limit=15&additionalCertificationId=&categoryId=100000000000001&name=&standardId=100000000000042 No information about limitation of scope of endorsement relating to ex-ante instruments.

Revised document:	ICR requirement document
Paragraph	5.4, 5.5, appendix II
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised document:	ICR definitions
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/definitions/icr-definitions-v3.1

Revised document:	ICR process requirements
Paragraph	8.2, 8.3, 8.5
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

New document:	ICR Article 6.2 procedures
Paragraph	3, II.3, V
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-article-6-2-procedures-v1.0

5.3   Permanent

5.3.1   Identify the project types under the Programme that have a risk of reversal. Describe the Programme's requirements for a multi-decadal term/commitment by the project developer.

ISO 14064-2 briefly touches upon the concept of permanence in section 6.7, mandating that project proponents must develop and implement criteria, procedures, and/or methodologies to evaluate the risk of reversal in greenhouse gas (GHG) emission reductions or removal enhancements. This ensures the long-term impact and reliability of the climate benefits claimed.

In contrast, ICR delves into the issue of non-permanence with greater specificity in section 4.8.2 of its documentation. Here, it requires project proponents to ensure a permanence period of 50 years for the GHG emission reduction or removal enhancements. To support this commitment, proponents are obliged to make contributions to a buffer adjustment account, which is managed by ICR. This account serves as a reserve to address any future reversals, safeguarding the integrity and permanence of the climate benefits achieved by the projects.

The project proponent shall define the permanence of the GHG emission mitigations. However the minimum term of permanence shall be 50 years after the end of the last crediting period.

Project proponent implementing AFOLU projects and CDR subject to a risk of reversal shall deposit non-tradable buffer credits to cover unforeseen losses in carbon stocks.

A proportion of expected GHG emission mitigations shall be transferred to a buffer adjustment account to protect projects from unexpected reductions in carbon stocks or increases in emissions. The project proponent shall establish and apply criteria, procedures, and/or methodologies to assess the risk of a reversal of GHG emission mitigations. A reversal risk assessment shall address the risk of non-permanence, including both general and project-specific risk factors. General risk factors include financial, technical, management, rising land opportunity costs, regulatory and social instability, and natural disturbances. Project-specific risk factors may vary by project type. Project proponents may use a relevant current good practice guidance risk assessment tool7 or rely on ISO 31000 to assess the non-permanence risk.

The number of credits to be deposited to the AFOLU and CDR pooled buffer adjustment account is determined by the risk assessment.

Irrespective of the risk assessment, the project proponents shall never deposit less than 10% of issued ICCs in the AFOLU buffer adjustment account and 1% in the CDR (non-AFOLU) buffer adjustment account.

Where an event occurs that is likely to result in a reversal event, the project proponent shall notify ICR within 30 days of discovering the likely event. Where instruments have previously been issued, the proponent shall prepare a reversal event report including a conservative estimate of the reversal of previously verified GHG emission mitigations due to losses in carbon stocks from the project, based on monitoring of the area affected by the event, and
submit to ICR.

At the next verification subsequent to the loss event, the monitoring report shall restate the loss from the loss event and calculate net GHG emission mitigations for the

monitoring period in accordance with the quantification procedures provided in the PDD.

See further in
[ICR requirement document](#)
[ICR process requirements](#) section 4.4.

Changes from first to second assessment

ICR has revised the ICR requirement document on risk assessment on reversals. Kita Earth Limited was instructed in April 2024 to provide ongoing risk management and mitigation services for ICR.

The role of Kita is to support ICR in providing "Buffer as a Service", which helps proactively identify, manage and mitigate risks via upfront insurance-driven risk assessment, liquidity management and transparent reporting. Kita was engaged to provide Buffer as a Service in April 2024, which is why this service wasn't referenced in ICR's earlier submission. Key aspects of Buffer as a Service include:

1. Risk assessment, permanence scoring and scenario analyses across the entirety of the ICR project portfolio to ensure projects can be compared on a 'like for like' basis.
2. Risk Adjusted Contribution per project, utilizing insurance quality underwriting criteria to assess the level of buffer contribution. Risk assessment factors include counterparty, country and project specific risk that could lead to under-performance and/or reversal, leading to non-permanence. Factors include but are not limited to:
   a) track record of the project developer;
   b) financial and KYC assessment of the project developer and implementation partners;
   c) natural catastrophe risk modeling;
   d) supply chain disruption;
   e) country risk, including land ownership rights, community engagement and benefit sharing, fraud and corruption indices, and wider political and regulatory risk considerations, for example across expropriation, confiscation, export license cancellation, contract frustration (including those leading to issues like revocation of Corresponding Adjustments), war/terror/civil unrest; and
   f) technical risks which will vary by project type.
3. Ongoing portfolio management and reporting on liquidity and risk in-line with financial industry standards. This includes regular reporting on buffer performance, systemic risk factors, buffer depletion scenario analyses to ensure buffer depletion risks are mitigated and transparent reporting on results that can be made publicly available.
4. Advice on where further incorporation of insurance could be beneficial for ICR and/or its stakeholders.

With this approach proponents are not required to conduct a risk assessment on permanence but the insurance company (Kita) will conduct an independent risk assessment for reversals considering multiple different risk factors as outlined above.

In this sense ICR has updated the ICR requirement document, ICR process requirements, detailing how reversal risk is assessed and managed. Now any adjustment allocations are determined based on risk assessment by ICR, supported with Kita's expertise.

Revised document:	ICR requirement document
Paragraph	5.4, 5.5, 6.8.2, appendix II
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F5ecDWFW3LcUpu819e8RO%2FICR%20Requirement%20Document%20v6.0.pdf?alt=media&token=3518c344-0e0e-4079-8bc8-89029523163d

Revised document:	ICR process requirements
Paragraph	8.2, 8.3, 8.5
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2Fbqe4NxsXnn3q9ASFh3Ph%2FICR%20Process%20Requirements%20v6.0.pdf?alt=media&token=329f0281-b954-4672-b189-d9fe7382ba5a

New document:	ICR Article 6.2 procedures
Paragraph	3, II.3, V
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FWzTYTKFpG8E6YIMKSWIu%2FICR%20Article%206-2%20procedures%20v1.0.pdf?alt=m

	edia&token=4c4bd28c-9939-49b0-b850-472715d83f8c

Changes since last submission

The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	5.4, 5.5, 6.8.2, appendix II
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised document:	ICR process requirements
Paragraph	8.2, 8.3, 8.5
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

New document:	ICR Article 6.2 procedures
Paragraph	3, II.3, V
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-article-6-2-procedures-v1.0

5.3.2 For projects with a risk of reversal, describe the requirements for the project to complete a risk mitigation plan that includes, at minimum, a description of how risks of reversal will be minimised.

To minimize the risk of reversal, ICR mandates a comprehensive internal risk assessment process for project proponents. This process involves identifying, quantifying, and mitigating risks associated with the project. For conducting these risk assessments, ICR recommends adhering to established good practice guidance tools or the principles outlined in ISO 31000, which provides a robust framework for risk management.

The outcome of this risk assessment, specifically the quantification of residual risk, directly informs the required contribution to the buffer adjustment deposit. This deposit acts as a safeguard, ensuring that there are resources available to address any unforeseen reversals of GHG emission reductions or removal enhancements. By linking the buffer deposit to the assessed risk, ICR ensures a tailored approach to risk management, enhancing the resilience and reliability of the climate benefits generated by projects.

See further in section 4.8.2 in ICR requirement document

Changes from first to second assessment

See section 5.3.1 above how reversals are dealt with under relevant sections in revised ICR documentation. Further to determine buffer risk adjustment contribution ICR conducts a risk assessment of non-permanence of projects, utilizing insurance quality underwriting criteria. Risk factors considered include counterparty, country and project specific risk that could result in under-performance and/or reversal, leading to non-permanence. Factors include but are not limited to:

a. track record of the project proponent and developer;
b. financial and KYC/B assessment of the project proponent and developer and implementation partners;
c. natural catastrophe risk modelling;
d. supply chain disruption;
e. country risk, including land ownership rights, community engagement and benefit sharing, fraud and corruption indices, and wider political and regulatory risk considerations, for example across expropriation, confiscation, export license cancellation, contract frustration, war/terror/civil unrest; and
f. technical risks which may vary by project type.

To conduct the assessment ICR may rely on external risk advisors from the insurance industry.

Changes since last submission

In section 5.11 of the ICR requirement document the proponent is now required to conduct a risk assessment as explained in the response letter shared with ICROA in September. Major risks that the proponent shall consider is non-permanence (which ICR will review and consider when conducting its own risk assessment). The risk assessment conducted by the proponent serves as an input to ICR's risk assessment in collaboration with risk advisor (Kita).

From the public consultation documents that were published in July, it seems that the requirement for mitigating any risk is missing.

This has now been rectified. The final version of the ICR requirement document v6.0 now includes a requirement that proponents shall implement actions to reduce any risks identified.

Additionally, the updated PDD template now includes a table where the project proponent is required to consistently present the results of the risk assessment.

The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	5.11
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

5.3.3 For projects with a risk of reversal, describe the risk mitigation mechanism(s) in place to ensure any carbon credits lost to intentional or unintentional reversals are replaced.

Section 4.4.1 in ICR process requirements addresses procedure on compensation due to reversal events. See ICR process requirements: https://documentation.carbonregistry.com/documentation/icr-program/procedures/icr-process-requirements-v5.0#toc158103557

The number of ICCs to be deposited in the pooled buffer account is determined by non-permanence risk following the requirements in the ICR requirement document. The non-permanence risk rating and this percentage are applied to the project's carbon stocks verified to determine the number of ICCs to be deposited in the ICR pooled buffer account.
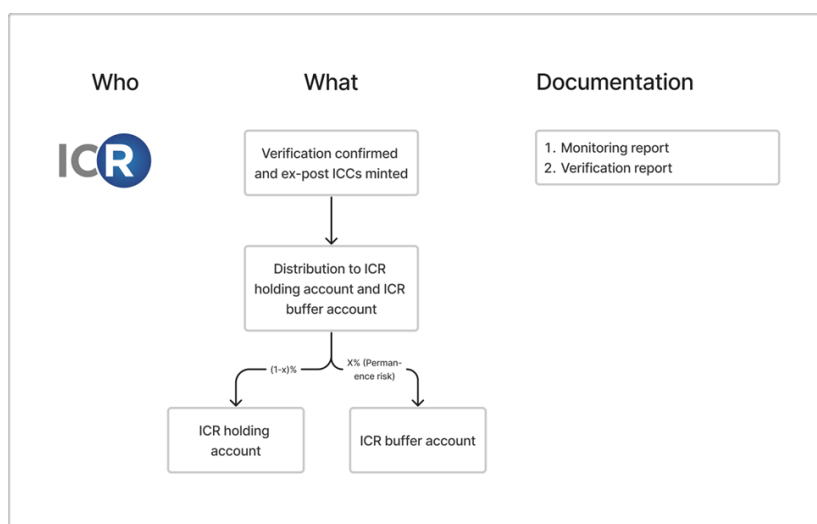
At the submission of the verification report and minting of ICCs to the ICR holding account, ICR allocates the buffer credits to the ICR buffer adjustment account. Buffer ICCs are not subject to issuance fees.

ICCs within the pooled buffer adjustment account from different projects are functionally distinct, although administered in one pooled account in the ICR registry. Therefore, ICCs from the same project types will compensate for reversal events for the same project type. ICR will retire ICCs from the buffer adjustment account to compensate for reversals on a first-in, first-out rule after identifying which ICCs meet the criteria above for reversal compensation.

Cancellation of buffer ICCs

Buffer credits are cancelled from the ICR buffer account when a reversal event or other events result in the loss of carbon stocks issued as ex-post ICCs. When buffer ICCs are cancelled, the reversal event resulting in the cancellation is disclosed as the reason.

Reversal events

In the event of a potential reversal event, the project proponent shall notify ICR within 30 days of discovering the potential reversal event. If there have been previous issuances of ICCs, the report must be prepared and submitted to the ICR Registry, following these guidelines:

The reversal event report shall use the ICR reversal event report template. Based on monitoring the entire affected area, it shall contain a conservative estimation of the reversal of previously verified GHG emission mitigations due to decreases in carbon stocks from the project.

The reversal event report shall be submitted to the ICR registry within two years from the discovery date of the reversal event. Failure to submit the reversal event report within this timeframe will render the project ineligible to issue ICCs.

The ICR registry will temporarily hold buffer credits from the ICR buffer adjustment account, equivalent to the estimated reversal stated in the reversal event report.

The project proponent shall account for the reversal at the following verification after the reversal event.

If the verified net GHG emission mitigations are negative, the withheld buffer credits shall be cancelled, and any remaining buffer credits released.

If the reversal is greater than stated in the reversal event report, an equivalent number of buffer credits are cancelled.
The withheld buffer credits are released if the GHG emission mitigations are positive.
ICR reversal event report shall be publicly available.

See further:
ICR requirement document
ICR process requirements
ICR reversal report
ICR monitoring report

Changes since first to second assessment
As per our response to question 5.3.1, ICR is working with carbon insurance specialist company, Kita, to provide ongoing risk management and mitigation services for ICR. A key aspect of this work is assessing risk adjusted buffer contributions per project, utilizing insurance quality underwriting criteria to assess the level of buffer contribution. Please see further elaboration on this point in question 5.3.2.

Changes since last submission
To align with ICROA requirements ICR has revoked the option of reconciling any non-permanence and non-performance events in cash in the final version of the published documentation.

This can be found in section 5.4 and in 6.8.2 of the ICR requirement document.
ICR believes that to scale carbon markets, alternative forms of compensation, beyond in-kind options, could be beneficial as there are means to guarantee a purchase of ex-post instruments with in-cash polity. The ICR will however not introduce any such insurance without prior consultation with ICROA and further discussions with insurance companies to explore reconciliation options before implementation.

From the last assessment there were concerns that ex-ante ICCs could be used to reconcile any non-permanence events. This issue has been addressed specifically to prevent any confusion. Deposits of ex-ante ICCs to the non-permanence adjustment account are to increase transparency of any ex-ante ICC issuances. They will be converted to ex-post ICCs following monitoring and verification, thereby populating the non-permanence account with ex-post ICCs in the future. Once ex-ante ICCs are replaced by verified ex-post ICCs, the corresponding ex-post credits will be eligible to compensate for non-permanence events. The purpose of depositing ex-ante ICCs into the non-permanence adjustment account is to provide transparency about the future inventory of ex-post ICCs that may be used for such compensation. To clarify, ex-ante ICCs in the account are not eligible for compensation, and they do not represent actual GHG emission reductions.

Section 8.5.2.1 has been updated in the final published version of the ICR process requirements to clarify this issue.

The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR process requirement
Paragraph	8.5.2.1, Annex II
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

Revised document:	ICR requirement document
Paragraph	5.4, 6.8.2
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

5.3.4 Provide evidence that the requirements and mechanisms described in Sections 5.3.1-5.3.3 are in place and followed.

Please see ICR requirement document https://documentation.carbonregistry.com/documentation/icr-program/criteria/icr-requirement-document-v5.0 and

ICR process requirements https://documentation.carbonregistry.com/documentation/icr-program/procedures/icr-process-requirements-v5.0#toc158103557

Publicly any buffer adjustment and/or adjustment ICCs are deposited to International Carbon Registry (buffer adjustment account) and International Carbon Registry (adjustment account).

Changes since first to second assessment
The buffer account has been populated with ex-ante ICCs and ex-post ICCs from project - ID 190 and ex-post ICCs from project with ID 48. Note the deposits were completed according to current documentation of the ICR program as revisions have not been published yet as they're under public consultation.

Changes since last submission
The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR process requirement
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

Revised document:	ICR requirement document
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

5.4 Additional

5.4.1 Describe the methods the Programme uses to assess additionality.

ICR defines additionality in ICR requirement document, see section 4.3.1 in the requirements. https://documentation.carbonregistry.com/documentation/icr-program/criteria/icr-requirement-document-v5.0#toc147747485.

The concept of additionality is a vital consideration for quantifying project-based GHG emissions mitigation. Additionality represents a net environmental benefit and real mitigation of GHG emissions in excess of the baseline scenario. Additionality shall be demonstrated with a positive outcome of a project-specific additionality test. ICR defines additionality as a multilevel principle, ranging from level 1 to level 5, where these levels are laid out as follows:

Level 1 additionality – ISO 14064-2 GHG emissions additionality
GHG emission mitigations shall be additional to the baseline scenario. ISO 14064-2 addresses additionality as the project proponent shall select or establish, justify, and apply criteria and procedures for demonstrating that the project results in GHG emissions mitigations that are additional to what would occur compared to the determined GHG baseline.

Level 2 – Statutory additionality
Projects shall be additional to statutory requirements or are systematically not enforced if imposed.

Level 2a additionality – Statutory additionality

The project shall implement actions that go beyond statutory requirements. Projects are statutory additional if their implementation and/or operation is not required by any law, statute, or other regulatory framework, agreements, settlements, or other legally binding mandates requiring implementation and operation or requiring implementation of similar measures that would result in the same levels of GHG emission mitigations in the host country.

Level 2b additionality – Non-enforcement additionality

Projects are non-enforcement additional if their implementation and/or operation is subject to statutory requirements that are systematically not enforced and where non-compliance with those requirements is widespread in the host country without consequences.

Level 3 additionality – Technology, institutional, common practice additionality

The project shall implement climate actions that are subject to barriers to implementation or accelerate the deployment of technology or activities.

Projects may be technology, institutional, or common practice additional if it faces significant organizational, cultural, social, or technological barriers to implementation, where carbon market incentives are essential in overcoming these barriers. These barriers may be a lack of trained personnel, supporting infrastructure for implementation, logistics for maintenance, and lack of knowledge on practices. The project activity may lead to accelerated technology deployment that would unlikely have occurred otherwise. If an action can demonstrate the promotion of an accelerated deployment of a technology that would otherwise face difficulties and have slower penetration, then it is assumed that the increased rate results in increased GHG emissions mitigations.

Level 4 additionality – Financial additionality

Financial additionality is a criterion to assess the additional environmental benefits of a climate project seeking support or financing within a climate mitigation framework. It determines whether the project's GHG emission mitigations would not have occurred without the financial incentives or support provided by the GHG program.

Level 4a additionality – Financial additionality I

Projects are considered level 4a additional if they face financial limitations that can be mitigated by revenues from the sale of carbon credits where carbon credit revenues are reasonably expected to incentivize the implementation of projects or carbon credit revenues important in maintaining the projects' operations' ongoing financial viability post-implementation.

A project is Level 4a financially additional if the project activity results in higher costs or relatively lower profitability than would have otherwise occurred in the baseline scenario.

Level 4b additionality – Financial additionality II

Projects are considered level 4b additional if they face significant financial limitations that can be avoided by revenues from the sale of carbon credits, where carbon credit revenues are the major or only source of revenues. Carbon credit revenues are a

precondition for the implementation of the project and/or carbon credits revenues are essential in maintaining the project operations and ongoing financial viability post-implementation.

Level 5 additionality – Policy additionality
Projects are considered level 5 additional if their implementation goes beyond its host country's climate objectives and lies outside the scope of the climate action strategy towards the host country's NDCs.

Additionality Test
Project proponents shall demonstrate the project's additionality and, at a minimum, meet level 1, and either 2a or 2b. They, shall also meet one additional level from 3, 4 or 5. However, the project may demonstrate if it conforms to other additionality levels. When applying a methodology, the project proponent should follow additionality testing guidelines.
For additionality testing, project proponents may apply the latest version of: CDM Tool for demonstration and assessment of additionality; Combined tool to identify the baseline scenario and demonstrate additionality; Positive lists of technologies, and referred tools or other tools from a recognized origin. For policy additionality, the project proponent shall rely on and refer to the host country's current NDC. Projects are labeled with their additionality levels in the ICR registry platform.

Projects are labelled according to their additionality, see for example:
https://www.carbonregistry.com/explore/projects/ad2dec62-85d2-46b9-884f-fd218a0453b0?tab=benefits

See further
ICR requirement document

ICR validation and verification specifications

Changes since first to second assessment
ICR has revised the ICR requirement document and provided more details on how additionality needs to be demonstrated. All projects need to demonstrate that they conform to additionality levels they apply, irrespective of a positive lists or automatic additionality referred to in applied methodologies. In the previous version, reference to positive list was for the purpose of relying on the arguments from positive list for automatic additionality. This has been further clarified in the ICR requirement document and ICR validation and verification specifications.

Revised document:	ICR requirement document
Paragraph	6.4.1
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F

	[5ecDWFW3LcUpu819e8RO%2FICR%20Requirement%20Document%20v6.0.pdf?alt=media&token=3518c344-0e0e-4079-8bc8-89029523163d](#)

Revised document:	ICR validation and verification specifications
Paragraph	7.1.4.5.1
Link	[https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FvJS5GWjMIyUpq2GnvDZt%2FICR%20validation%20and%20verification%20specifications%20v2.0.pdf?alt=media&token=937f71e3-f91e-41bd-967d-4b1ebde339a0](#)

Changes since last submission

During public consultation ICR received a comment relating to standardized methods for demonstrating additionality. In the final documentation ICR made minor changes to the additionality requirements and with further clarification of minimum levels in section 6.4.1 also providing a table where additionality levels are explained. in the ICR methodology requirements stipulation added relating to standardized methods and in appendix specifications on considerations for such methods are provided.

The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	6.4.1
Link	[https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0](#)

Revised document:	ICR Methodology requirements
Paragraph	6.7, appendix II

Link	https://documentation.carbonregistry.com/documentation/icr-program/methodology-development/criteria/icr-methodology-requirements-v3.0

5.4.2 If the Programme pre-defines certain projects as automatically additional (e.g., through a "positive list" of eligible project types), describe how the activity was determined to be additional. Provide evidence that the criteria for such positive lists are publicly disclosed, and conservative.

If methodology refers to a positive list may support proponents in demonstrating additionality according to the additionality requirements as outlined in section 4.4.1.

See:
ICR requirement document

Changes since first to second assessment
Please see response to section 5.4.1 above

Changes since last submission
Please see response and changes made from last submission in section 5.4.1 above. The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	6.4.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

5.5 Measurable

5.5.1 Provide evidence that carbon credits are issued from project-based standards and methodologies. Describe any methodologies where carbon credits are issued from a product-based methodology or via lifecycle assessment.

ICR operates as a project-based standard that accommodates a variety of project activities, aligning with the principles of ISO 14064-2, which is designed specifically for project-level activities. ISO 14064-2 provides detailed guidance for the quantification, monitoring, and reporting of greenhouse gas (GHG) emission reductions or removal enhancements at the project level. The ICR requirements document builds upon this

foundation, adding additional project-related requirements to ensure comprehensive environmental integrity and transparency.

In the realm of methodology development, ICR clearly defines the criteria for validation to be in accordance with ISO 14064-2 and the specific ICR methodology requirements. The application of these methodologies is intended to guide projects towards fulfilling both the ISO 14064-2 standards and the tailored requirements set forth by ICR. This dual adherence ensures that projects not only contribute to GHG emission reductions or removal enhancements but also align with ICR's specific criteria for environmental benefit and sustainability.

For detailed eligibility criteria, the ICR requirements document, ICR validation and verification specifications, and ICR methodology requirements offer extensive specifications. These documents collectively provide a robust framework for project proponents, ensuring that all projects and methodologies under the ICR standard meet the highest levels of integrity, accountability, and environmental impact.

See:
ISO 14064-2
ICR requirement document
ISO 14064-3
ICR validation and verification specifications

Changes since first to second assessment
No changes

Changes since last submission
The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised document:	ICR validation and verification specifications
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-

5.5.2 **Provide evidence of procedures in place to ensure projects are measurable and backed by data. These procedures must include, at minimum, requirements for:**

- **All projects to clearly define the business-as-usual baseline scenario.**
- **All projects to identify and mitigate leakage of emissions.**
- **Projects to use conservative estimates if real project data is not available.**
- **All projects to re-calculate baselines, at minimum, upon each**

All projects shall identify and define the baseline scenario. See for example ISO 14064-2 section 6.4.

The project proponent shall select or establish criteria and procedures for determining the GHG baseline considering the following:
a) the project description, including identified GHG SSRs (see 6.3);
b) existing and alternative project types, activities and technologies providing equivalent type and level of activity of products or services to the project;
c) data availability, reliability and limitations;
d) other relevant information concerning present or future conditions, such as legislative, technical, economic, socio-cultural, environmental, geographic, site-specific and temporal assumptions or projections.
The project proponent shall demonstrate functional equivalence in the type and level of activity of products or services provided between the project and the baseline scenario and shall explain, as appropriate, any significant differences between the project and the baseline scenario.The project proponent shall select or establish, describe and apply criteria and procedures for identifying and justifying the GHG baseline.

The justification of the GHG baseline should take into account likely future behaviour of the baseline scenario (GHG SSRs) to meet the conservativeness principle (4.7).
NOTE There are different ways of determining a GHG baseline, including based on past and current data. A GHG programme can prescribe other approaches to determine the GHG baseline, such as a performance standard
(e.g. benchmark or multi-project) baseline. A GHG baseline can be static (remain the same during the project period) or dynamic (change over time during the project period).
In developing the GHG baseline, the project proponent shall select and justify the assumptions, values and procedures that ensure GHG emissions reductions or removal enhancements are not overestimated.
The project proponent shall select or establish, justify and apply criteria and procedures for demonstrating that the project results in GHG emissions reductions or removal enhancements that are additional to what would occur in comparison to the determined GHG baseline.

A.3.4 provides guidance on determining the GHG baseline.

In addition to the ISO 14064-2 requirements ICR stipulates in section 4.4 additional requirements.

The baseline scenario represents activities and GHG emissions that are most likely to occur in the absence of the project activity. The project proponent shall select or establish, describe, and apply criteria and procedures to identify, determine, and justify the GHG baseline scenario. The baseline scenario shall be accurately determined so that an accurate comparison can be made between the GHG emissions that would have occurred under the baseline scenario and the GHG emission mitigations achieved by project activities. In developing the baseline scenario, project proponents shall justify assumptions, values, and procedures so that the most plausible baseline scenario leads to a conservative estimation of GHG emission mitigations.
When applying a methodology, the project proponent should establish and describe the baseline scenario according to the applied methodology's requirements and justify any deviations from the methodology unless a more conservative baseline is established.
Project proponents should check that the data needed to determine the baseline scenario are available before attempting to identify the baseline scenario. Available data shall be relevant, reliable, and verifiable and may involve industry, country, regional, and local information. All sources for obtaining necessary information shall be documented.

In section 6.3 in ISO 14064-2 leakage is discussed and further in

The project proponent shall select or establish criteria and procedures for identifying and assessing GHG SSRs controlled, related to or affected by the project.
Based on the selected or established criteria and procedures, the project proponent shall identify GHG SSRs relevant to the project as being:
a) controlled by the project proponent;
b) related to the GHG project; or
c) affected by the GHG project.
A.3.2 provides guidance on identifying GHG SSRs relevant to the project.

Further, when quantifying the GHG emission and/or removals section 6.7 discusses what to quantify.

The project proponent shall select or establish criteria and procedures or methodologies for quantifying GHG emissions and/or removals for selected GHG SSRs (see 6.6). Based on selected or established criteria and procedures or methodologies, the project proponent shall quantify GHG emissions and/or removals separately for:
a) each relevant GHG for each GHG SSR relevant for the project;
b) each GHG SSR relevant for the baseline scenario.

And 6.8.

The project proponent shall select or establish criteria and procedures or methodologies for quantifying GHG emission reductions and removal enhancements during project implementation and operation.

The project proponent shall apply the criteria and methodologies selected or established to quantify GHG emission reductions and removal enhancements for the GHG project. GHG emission reductions or removal enhancements shall be quantified as the difference between the GHG emissions and/or

removals from GHG SSRs relevant for the project and those relevant for the baseline scenario.

The project proponent shall quantify, as appropriate, GHG emission reductions and removal enhancements separately for each relevant GHG and its corresponding GHG SSRs for the project and the baseline scenario.

In addition to the ISO requirements ICR complements for example with sections 4.3, 4.7 and 4.8.

4.3.

The project proponent shall describe, identify, and assess relevant GHG SSRs to the project and the baseline scenario and determine if they are controlled, related, or affected by the project (leakage), and if they shall be included or excluded. Any grounds for exclusion shall be demonstrated and justified. The project proponent may follow or rely on a methodology to

determine the project boundary.

4.7

GHG emission mitigations achieved by the project activity and addressing leakage (GHG SSRs affected by the project) lay the foundation for the volume of ICCs that can be issued. Project proponents shall follow a methodology to quantify GHG emissions mitigations or establish criteria and procedures for the quantification. The quantification shall include all GHG SSRs identified and all GHGs and shall be reported in t CO2-e.

The project proponent shall estimate GHG emissions mitigations for selected GHG SSRs separately for:

1. each relevant GHG for each GHG SSR relevant for the project;

2. each GHG SSR relevant for the baseline scenario.

Net GHG emissions and/or removals generated by the project activities shall be quantified and reported.

4.8

Based on criteria from section 4.7, the project proponent shall select and follow criteria from a methodology or establish criteria and procedures for quantifying aggregated GHG emission mitigations during the implementation and operation of the project to undertake ex-post calculations of GHG emission mitigations. The project proponent shall describe all steps to be

undertaken, resulting in quantification as the net difference between the baseline and the GHG emissions mitigations considering leakage. The project proponent shall provide ex-post calculation and quantification of GHG emission mitigations for each monitoring period.

The project proponent shall provide ex-ante projections for each monitoring period and for the total projections for the GHG emission mitigations for the crediting period.

The quantification shall convert all GHGs to t CO2-e.All ex-ante estimates and ex-post calculations shall be converted to CO2-e using GWP values from the IPCC AR5 unless earlier GWP values can be justified.

4.8.1 Leakage
Potential sources of leakage (affected GHG SSRs), as identified in section 4.3, and the location of areas where leakage could occur shall be identified, accompanied by a description of any appropriate mitigation measures. Any leakage assessment shall be conservative, shall not account for positive leakage, and shall be subtracted from the quantification of GHG emission
mitigations of the project. Any potential leakage shall be monitored. All leakage shall be deducted from the total GHG emission mitigations of the project and subtracted from the number of GHG emission mitigations eligible to be activated.

Conservativeness is one of the key principles of ISO 14064-2 and the ICR program.

For example, in the ICR requirement document conservativeness is addressed in the principles section:
Conservativeness - Use conservative assumptions, values, and procedures to ensure that GHG emission mitigations are not over-estimated.

Conservativeness is further addressed throughout the ISO 14064-2, for example in section 6.4 discussed above and in greater details in appendix A.2.7 Conservativeness.

Conservativeness is usually satisfied by:
- *the appropriate choice of the path of technological development and the rate of implementation in the relevant geographic area and time periods in the absence of the project;*
- *taking into account the impact of the project on the path of development and rate of implementation in the relevant geographic area and time periods;*
- *the appropriate choice of parameters affecting the project's GHG emissions, removals and SSRs;*
- *providing reliable results maintained over a range of probable assumptions.*

The principle of conservativeness is applied when highly uncertain parameters or data sources are relied upon for the determination and the quantification of the GHG baseline, and for project GHG emissions and removals. In particular, the conservativeness of the GHG baseline is established with reference to the choice of approaches, assumptions, methods, parameters, data sources and key factors so that GHG baseline emissions and removals are more likely to be under-estimated rather than overestimated, and that reliable results are maintained over a range of probable assumptions. However, using the conservativeness principle does not always imply the use of the most conservative choice of assumptions or methods. Explanations of how assumptions and choices are conservative should be provided in project documentation. The implementation of the conservativeness principle is frequently a matter of balance (e.g. between accuracy, relevance and cost-effectiveness). When less accurate methods are chosen, more conservative assumptions and methods should be applied.

Regarding reassessment of the baseline ICR stipulates that at a minimum it should be when renewing the crediting period, see section, 3.4.2 in ICR requirement document:

Project proponents may apply at the end of the current crediting period to renew the crediting period, subject to conformity to all future requirements, update of the PDD, re-evaluating baseline scenarios using tools and methodologies in effect at the time of renewal, and validation by an approved VVB.

See
ISO 14064-2
ICR requirement document
ISO 14064-3
ICR validation and verification specifications

Changes since first to second assessment
No changes

Changes since last submission
The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised document:	ICR validation and verification specifications
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

5.5.3 Provide evidence that all methodologies under the Programme have monitoring requirements that are validated and verified for each project.

In ISO 14064-2 section 6.10 relates to monitoring.

The project proponent shall establish and maintain a monitoring plan that includes procedures for measuring or otherwise obtaining, recording, compiling and analysing data and information important for quantifying and reporting GHG emissions and/or removals relevant for the project and baseline scenario (i.e. GHG information system). The monitoring plan shall include the following, as applicable:

a) purpose of monitoring;

b) list of parameters being measured and monitored;

c) types of data and information to be reported, including units of measurement;

d) origin of the data;

e) monitoring methodologies, including estimation, modelling, measurement, calculation approaches and uncertainty;

f) monitoring frequency, considering the needs of intended users;

g) monitoring roles and responsibilities, including procedures for authorizing, approving and documenting changes to recorded data;

h) controls that include internal data check for input, transformation and output, and procedures for corrective actions;

i) GHG information management systems, including the location and retention of stored data and data management that includes a procedure for transfers of data between different forms of systems or documentation.

Where measurement and monitoring equipment is used, the project proponent shall ensure that calibrated or verified monitoring and measurement equipment is used and maintained, as appropriate.

The project proponent shall apply GHG monitoring criteria and procedures in accordance with the monitoring plan.

All data and information related to the monitoring of the GHG project should be recorded and documented.

In addition to the ISO 14064-2 requirements, ICR requirement document stipulates monitoring and verification in section 4.10.

The impacts of project activities on identified GHG SSRs shall be monitored in order to determine the net GHG emission mitigations and for the purpose of issuing and/or activating already issued ICCs. The monitoring plan shall include parameters, GHG SSR identified and according to section 4.6 and/or be in line with the applied methodology and the requirements of ISO 14064-2.

All data and information related to the monitoring of the GHG project shall be recorded and documented following procedures established according to section 4.10.

If the project has other environmental and/or social benefits being verified, the monitoring plan shall also outline measurements or otherwise obtain, record, compile, and analyze data and information important for quantifying and reporting impacts on relevant environmental and/or social impacts.

According to the monitoring plan, the project proponent shall provide monitoring results to the VVB. Project proponents shall use the monitoring report template for reporting. The monitoring report shall include schedules, roles and responsibilities, equipment, resources, and methodologies to obtain, estimate, measure, calculate, compile and record GHG data and other information for the project and GHG emissions mitigations.

The frequency of monitoring and verification for projects that have been validated, registered and issued ex-ante instruments shall be annual. For AFOLU projects, the monitoring and verification frequency may be up to five years.

In addition to this all projects are subject to validation where the monitoring plan is assessed and validated.

See
ISO 14064-2
ICR requirement document
ISO 14064-3
ICR validation and verification specifications

Changes since first to second assessment
No changes

Changes since last submission
The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised document:	ICR validation and verification specifications
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

5.5.4 Demonstrate that the Programme's methodologies are based on scientifically robust or peer-reviewed methods and go through a public consultation process.
ICR has two pathways for project registration.

1. Following a pre-approved methodology. Where the criteria are ICR requirement document, ISO 14064-2 and the applied methodology.
2. Where there is not a pre-approved methodology available project proponents may either:
    a. Develop a new methodology or
    b. Follow the requirements of ICR requirement document and ISO 14064-2 in developing the project.

1. ICR maintains an approved list of methodologies on its documentation site, currently featuring methodologies active within the Clean Development Mechanism (CDM). The application of these methodologies is designed to ensure compliance with both ISO 14064-2 standards and the specific requirements outlined in the ICR requirements document. This approach facilitates the alignment of project activities with established international guidelines and ICR's own criteria, ensuring that projects contribute effectively to greenhouse gas emission mitigations with verified environmental integrity.
2. a. In instances where a pre-approved methodology is not available, proponents may develop a new methodology in accordance with the ICR methodology requirements and the ICR methodology approval process. Presently, there are five methodologies under formal development. For more information on these methodologies and to participate in the public consultation process, interested parties are directed to visit the ICR's public consultation page. This process ensures that new methodologies are rigorously evaluated and meet the high standards set by ICR before being adopted for use in projects, thereby facilitating innovation and expansion of the project scope within the ICR program. The ICR methodology requirements stipulate the following:

Methodologies shall encourage ambition over time; encourage broad participation; be real, transparent, conservative, credible, and below 'business as usual'; avoid leakage where applicable; recognize suppressed demand. Methodologies shall include relevant assumptions, parameters, data sources, and key factors.

Methodologies shall also consider uncertainty, leakage, policies and measures, and relevant circumstances, including social, economic, environmental, and technological circumstances, and address reversals where applicable.

Methodologies may be developed by project proponents, stakeholders, or ICR. Methodologies shall be validated by a VVB accredited for the sectoral scope the methodology applies to and be approved by ICR through the ICR methodology approval process, confirming its conformity to the ICR requirement document, the requirements herein, and ISO 14064-2. Methodologies shall demonstrate how they meet the requirements in this document and ISO 14064-2 at a methodology level. Methodologies shall be written clearly and concisely.

Further under validation of the methodology the ICR methodology requirements stipulate the following.

Validation of methodologies is the process of evaluating the proposed new methodology and its reasonableness of assumption, limitations, and methods included with its application and how it will support a statement of the outcome of the implementation of a project and its activities based on its application. Further evaluation of its conformity to ISO 14064-2, the ICR methodology requirements, and the ICR requirement document. All proposed methodologies are subject to validation of the proposed new methodology and the PDD developed following section 5.

And

Validation involves determining if the proposed methodology is eligible to generate GHG emission mitigation outcomes when applied. Validation shall be conducted according to ISO 14064-3 and ISO 14065. The validation report shall be made public.

Validation of the methodology may be in conjunction with validation of a PDD and verification of mitigation outcomes.

And

The validation process shall follow the requirements in ISO 14064-3. The criteria for validation are ISO 14064-2, the requirements herein, and applicable requirements from the ICR requirement document. During methodology assessment, VVBs need to assess whether the methodology conforms to the validation criteria with the establishment of criteria and procedures ensuring conservativeness and scientific integrity.

Methodology assessment requires background research, review of documentation, and interviews with experts and key stakeholders to determine whether the criteria and procedures established in the methodology conform to requirements and principles set out in the ICR requirement document and good practice standards and the requirements herein. VVBs need to consider underlying assumptions and approaches used in the methodology and assess whether and how the methodology incorporates relevant scientific and sector-specific considerations.

VVBs need to consider that methodologies shall be written in a manner that provides a prescriptive set of criteria and procedures that projects can apply and be assessed by VVBs to minimize subjective interpretation by project proponents applying the methodology and VVBs assessing projects. This includes using precise language, avoiding vague terminology, and ensuring the application and proper use of the keywords "can," "shall," "should," and "may.

In the ICR methodology approval process it is stipulated that methodologies shall undergo public consultation.

ICR publishes the proposed new methodology documentation on the ICR website for 28 days for consultation with stakeholders and the public on the proposed new methodology. In collaboration with ICR, the methodology developer may host a presentation of the proposed new methodology. Comments shall be submitted to admin@carbonregistry.com, and respondents shall provide their name, organization, country, and email address.

When the public consultation has ended, ICR provides comments received to the methodology developer and the VVB assessing the methodology. The methodology developer shall respond to all comments either by updating the methodology or demonstrating the insignificance or irrelevance of the comment. All adjustments shall be resubmitted to the VVB to assess the revision of validation.

See further in ICR methodology approval process.

2. b. Proponents have the option to design projects that directly conform to ISO 14064-2 and the ICR requirements document. This approach involves integrating methodological components within the project's documentation, which is particularly advantageous for innovative solutions where applicability conditions and monitoring techniques are yet to be fully established. Opting for this strategy can expedite the project's engagement with VCMs by excluding the need for separate methodology development, ensuring the project aligns with the rigorous requirements from ISO 14064-2 and the ICR requirements.

Adopting this approach streamlines the process, allowing for quicker access to VCMs under the assurance that the project meets strict criteria set by ISO 14064-2 and ICR. It necessitates that the VVB conducts a thorough assessment of the methodological components utilized within the project and evaluates the project's overall compliance with the established criteria and procedures, as well as the overarching criteria of the ICR program. This ensures a comprehensive review process, guaranteeing that the project's environmental integrity and contributions to emission mitigations are verified to meet international standards and specific ICR requirements.

See
ISO 14064-2
ICR requirement document
ISO 14064-3
ICR validation and verification specifications

Changes since first to second assessment
ICR has revised documentation that relates to methodology approvals.

The ICR requirements stipulate that projects may either
  i.   develop methodology elements within the project documentation and
  ii.   secondly they may develop a separate methodology for application at the project level.

Both ways require an assessment from a VVB of the methods being applied.

  i.   at the project level, where the VVB applies the ISO 14064-3 for assessment if the project conforms to ISO 14064-2, e.g. for baseline determination, (please see section 6.4 of ISO 14064-2) or other methodology elements.
  ii.   separate methodology (in parallel to project validation) where the developer has developed a methodology for consistency in later application of it.

Both options require a robust and complete assessment of if the methods applied conform to the validation criteria with the establishment of criteria and procedures ensuring conservativeness and scientific integrity align with best practices, on the basis of the best available scientific knowledge, and technical advancements.

To further clarity of the requirements set for methodologies and assessment ICR has expanded the ICR requirement document, ICR methodology requirements and ICR validation and verification specification to iterate in addition to the principles of ISO 14064-3 that methodology assessment, either at the project or methodology level shall guarantee that they are scientifically proven and peer-reviewed.

Further the process for public consultation has been strengthened and stipulates steps for public consultation for methodologies and how public comments shall be considered by the methodology developer and the VVB.

Revised document:	ICR requirement document
Paragraph	5.1, 5.3.1
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F5ecDWFW3LcUpu819e8RO%2FICR%20Requirement%20Document%20v6.0.pdf?alt=media&token=3518c344-0e0e-4079-8bc8-89029523163d

Revised document:	ICR methodology requirements
Paragraph	5
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FElQs2TI1ea136oA8z1nH%2FICR%20Methodology%20Requirements%20v3.0.pdf?alt=media&token=e944c540-caa7-4e50-b92d-f9231342bf23

Revised document:	ICR validation and verification specifications
Paragraph	7.1.4.1, 11
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FvJS5GWjMIyUpq2GnvDZt%2FICR%20validation%20and%20verification%20specifications%20v2.0.pdf?alt=media&token=937f71e3-f91e-41bd-967d-4b1ebde339a0

New document:	ICR process - Public consultation
Paragraph	5
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/ghg-program-management/public-consultation

Changes since last submission

Not specifically addressed in the last submission ICR methodology approval process section 4.5 states that

"ICR publishes the proposed new methodology documentation on the ICR public consultation website for 30 days for consultation with stakeholders and the public. In collaboration with ICR, the methodology developer may host as an ICR webinar, a presentation of the proposed new methodology to introduce the proposed methodology to stakeholders."

In response to the latest assessment report, which highlighted concerns regarding the scientific rigor and peer-reviewed basis of ICR methodologies, the following details outline ICR's requirements to ensure projects use scientifically validated, peer-reviewed methods. ICR responded specifically to the comment raised in a response letter in September.

To further elaborate on the scientific integrity of methodologies and methodology components of ICR projects, below is a background on the requirements stipulated in

the ICR program that projects shall follow peer-reviewed and scientifically proven methods.

Background
The ICR requirement document states that all projects shall be based on peer reviewed and scientific proven methods. Paragraph 2 of section 5.1 of the ICR requirement document v6.0 states:

"While designing, implementing, and monitoring a project activity or any activities within a multiple project activity, the project proponents shall consider and use any applicable standards, methodologies, methodological tools, guidelines, and other regulatory documents available. ***All criteria and procedures applied shall be based on best practices, on the basis of the best available scientific knowledge, and technical advancements, are scientifically proven and/or peer-reviewed.****"*

Therefore irrespective of application of a "methodology" the proponent shall demonstrate that the criteria and procedures are based on best practices, on the basis of the best available scientific knowledge, and technical advancements, are scientifically proven and/or peer-reviewed.

ICR relies on 3rd party assurance in assessing if the projects meet the requirements. **The VVBs shall be accredited for ISO 14065 (or approved as a DOE under CDM/A6.4). The VVB shall follow ISO 14064-3 in the assessment of projects, further where requirements go beyond ISO 14064-2 ICR has ICR validation and verification specifications.**

Noting the language from ISO 14064-2
"The project proponent shall identify, consider and use relevant criteria and procedures for every stage of the GHG project cycle where these are available, as shown in Figure 3. Where criteria and procedures are not available, the project proponent shall use relevant current good practice guidance. The project proponent shall select and apply established criteria and procedures from a recognized origin, if available.
In cases where the project proponent uses criteria and procedures or relevant current good practice guidance that derive from a recognized origin, the project proponent shall document and justify any departure from those criteria and procedures.
In cases where criteria and procedures or relevant current good practice guidance from more than one recognized origin exists, the project proponent shall justify the reason for using the selected recognized origin.
Where there is no relevant criteria, procedures or current good practice guidance from a recognized origin, the project proponent shall establish, justify and apply criteria and procedures to fulfil the requirements in this document.
If the project proponent subscribes to a GHG programme, the project proponent shall ensure that the GHG project conforms to the requirements of the GHG programme.
NOTE Good practice guidance can come from a recognized origin, such as industry practices and associations, similar projects, benchmarking, GHG programme methods or others that are fit for purpose."

The requirements of ISO 14064-2 are based on the principles of the standard and aim to guaranteeing that they are met:

"4.1 General
The application of principles is fundamental to ensure that GHG-related information is a true and fair account. The principles are the basis for, and will guide the application of, the requirements in this document.
4.2 Relevance

Select the GHG SSRs, data and methodologies appropriate to the needs of the intended user.
4.3 Completeness
Include all relevant GHG emissions and removals. Include all relevant information to support criteria and procedures.
4.4 Consistency
Enable meaningful comparisons in GHG-related information.
4.5 Accuracy
Reduce bias and uncertainties as far as is practical.
4.6 Transparency
Disclose sufficient and appropriate GHG-related information to allow intended users to make decisions with reasonable confidence.
4.7 Conservativeness
Use conservative assumptions, values and procedures to ensure that GHG emission reductions or removal enhancements are not over-estimated."

These principles are the same principles that govern the CDM, and have been adopted by more or less all GHG programs, including the ICR program, which has further expanded on them.

As outlined above, ICR requirements make it clear that the projects shall be based on peer reviewed and scientific proven methods as stipulated above.
To safeguard that projects are meeting the criteria ICR validation and verification specifications stipulate the following relating to validation of projects.

"6.1.2.3 Risk assessment considerations
When criteria for validation are, in addition to ISO 14064-2 and ICR requirement document, an approved methodology, the VVB may rely on specifics in the methodology, to reduce the level of detail in the risk assessment where the methodology has considered some risk types, e.g., significant emission sources, statutory requirements, quantification methods.
The VVB shall consider risks associated with applied methodologies align with best practices, on the basis of the best available scientific knowledge, and technical advancements."

"6.1.2.7 Uses for risk assessment information
The risk assessment may be used to evaluate if remote audit may be applicable.
Risk assessment may be used, where relevant, to inform ICR if the VVB considers the applied methodology not in line with alignment with best practices, on the basis of the best available scientific knowledge, and technical advancements"

"7.1.1 Strategic analysis
For the strategic analysis other relevant information referred to in section 7.1.1 in ISO 14064-3 may include other criteria applied for the validation and stakeholder consideration. Where relevant, the VVB should inform ICR if the VVB considers the applied methodology not in line with alignment with best practices, on the basis of the best available scientific knowledge, and technical advancements."

"7.1.4 Assessment of GHG-related activity characteristics
7.1.4.1 General
Where a methodology is applied the VVB shall consider if it aligns with best practices, on the basis of the best available scientific knowledge, and technical advancements and are scientifically proven and peer-reviewed.
Where criteria and procedures are developed and not following an approved methodology the VVB shall consider if they aligns with best practices, on the basis of

the best available scientific knowledge, and technical advancements and are scientifically proven and peer-reviewed."

As outlined in the ICR program requirements, ICR stipulates that VVBs are accredited for ISO 14065 by an accreditation body that is a member of the International Accreditation Forum. Accreditation is a confirmation by an accreditation who is recognized by governments, to assess against nationally and internationally agreed standards, organizations that provide conformity assessment services such as certification, testing, inspection, calibration and verification (conformity assessment bodies). The accreditation guarantees that the conformity assessment system, being followed, is recognized by a governmental institute.

ICR has further implemented safeguards, i.e. performs quality reviews of projects when they have been validated and communicates any findings to the proponent or the VVB if ICR has concerns about project documentation. An example can be found on the ICR registry.

https://www.carbonregistry.com/projects/agroecologyitaly-reducing-ghg-48?tab=documents

https://www.carbonregistry.com/projects/rahima-bay-sustainable-190?tab=documents

ICR also has mechanisms for reporting concerns to the relevant accreditation body if it determines that a VVB is not meeting accreditation standards. To this end, ICR has begun collaborating with accreditation bodies to establish agreements based on the IAF MD25:2023 Criteria for Evaluation of Conformity Assessment Schemes. ICR is now in the final process of establishing an agreement with ANAB on such an agreement relating to evaluation by ABs on conformity assessment schemes, the ICR program. ICR intends to do so for all ABs that have granted accreditation to approved VVBs.

In addition to these procedures, the International Carbon Registry (ICR) collaborates with independent risk analysts (Kita) to conduct comprehensive risk management assessments for each project. Identified risks are addressed through publicly visible buffer contributions. Furthermore, the ICR actively encourages third-party ratings for project proponents. These measures are designed to serve as both safeguards and fail-safes, establishing methods to enhance the consistency and accountability of project proponents while supporting continuous project monitoring.

Therefore, ICR has established a robust program based on ISO standards and assurance systems, ensuring that methods applied by projects align with best practices, utilize the best available scientific knowledge and technical advancements, and are scientifically proven and peer-reviewed.

To add to this ISO standards are considered industry best practice as they're developed by technical experts, an independent conformity assessment is in place, has a system to safeguard consistency and finally includes recognition of governmental institutes.

As stipulated above, the ICR program guarantees alignment with the ICROA criterion. From the referred requirement it is clear that if projects rely on other methodologies they need to demonstrate conformity to the requirements of the ICR requirement document and ISO 14064-2. All criteria and procedures applied shall be based on best practices, on the basis of the best available scientific knowledge, and technical advancements and are scientifically proven and/or peer-reviewed. However, the ICR has changed the wording of the requirement to accommodate the comment raised relating to application of other methodologies. When proponents are following a methodology, the methodology shall be developed under a GHG program that is endorsed by ICROA, CORSIA or ICVCM.

ICR has in previous application and in this application explained in detail criteria and procedures projects need to follow for registration with the ICR and the different routes available. ICR would like to point out that ICROA has endorsed the Riverse GHG program that, like the ICR, recognizes the methodology barriers that prevent participation of novel climate solutions in the VCMs. See for example section 6.1 of the Riverse standard rules v6.0: "*Projects that do not fall under one of these methodologies may still apply for Riverse Carbon Credits, following the general Standard Rules and eligibility criteria.*" Also in the Riverse registry example of projects, https://registry.riverse.io/ledger/transactions/03028079-6afb-41a3-9742-a43ead42681f.

The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	5.1, 5.3.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised document:	ICR methodology requirements
Paragraph	5
Link	https://documentation.carbonregistry.com/documentation/icr-program/methodology-development/criteria/icr-methodology-requirements-v3.0

Revised document:	ICR validation and verification specifications
Paragraph	7.1.4.1, 11
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-

	verification/criteria/icr-validation-and-verification-specifications-v2.0

6. Environmental and Social Impacts

6.1 Provide evidence of the publicly available rules and requirements that ensure all projects identify and mitigate and potential environmental or social impacts. These rules and requirements must include, at minimum, the "No Net Harm" principle is fulfilled by all projects.

In section 4.2.1 in the ICR requirement document stipulations about safeguards are provided.

Project proponents shall identify the project's potential negative environmental and socio-economic impacts and engage with local stakeholders during the project design and implementation of the activities. All projects shall undergo a 30-day public comment period and the project proponent shall implement a process of continuous communication with local stakeholders. The project proponent shall respond to all comments received and demonstrate actions implemented to the VVB. Stakeholders may continue to submit comments which shall be considered during subsequent verification.

The project proponent shall recognize, respect, and support local property rights and not infringe on private or public property. The project proponent shall not relocate people off their lands without consent, and when relocation occurs, it shall be carried out with just and fair compensation.

The project shall minimize and, where possible, avoid negative environmental and social impacts. If present, the project proponent shall address all negative environmental and socio-economic impacts arising from the project activities and input received during a consultation with local stakeholders and ongoing communications.

Where applicable, project proponents shall minimize the risk of damage to ecosystems by considering:

(a) not introducing invasive species or allowing an invasive species to thrive through project activities.

(b) the use of non-native species over native species and their potential adverse effects.

(c) the use of fertilizers, chemical pesticides, biological control agents, and other inputs used by the project and their possible adverse effects

Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission mitigations.

See:

[ICR requirement document](#)

Changes from first to second assessment

ICR has revised documentation that relates to safeguards. ICR has developed a Tool for assessment of Environmental and Socioeconomic Safeguards of GHG projects. The tool is based on the CDM Sustainable Development tool co-benefits description tool (SD tool). ICR has also developed a template for proponents to complete the assessment. All projects are subject to assessment of environmental and socio-economic impacts (may be positive and negative) and minimize or avoid any negative impacts resulting in no net harm to environment and socio-economy.

Revised document:	ICR requirement document
Paragraph	6.2.1
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F5ecDWFW3LcUpu819e8RO%2FICR%20Requirement%20Document%20v6.0.pdf?alt=media&token=3518c344-0e0e-4079-8bc8-89029523163d

New document:	ICR Tool for assessment of Environmental and Social Economic Safeguards of GHG projects
Paragraph	All document
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FLmjtWPDS22TxVoeLAUw6%2FICR%20Tool%20for%20Assessment%20of%20Environmental%20and%20Socio-economic%20Safeguards%20v1.0.pdf?alt=media&token=20d60968-a540-41c2-a237-235c0b210ca7

Changes since last submission

In the final version of the program revision, ICR has strengthened the safeguards section of the ICR Requirement Document and enhanced the ICR Tool for Environmental and Socio-economic Safeguards and Sustainable Development. These enhancements ensure that projects claiming contributions to the Sustainable Development Goals (SDGs) provide clear evidence by referencing relevant UN SDG indicators, now integrated into the Tool.

1. Section 5.9 stipulates application of the tool when claiming any SDG contributions, which shall be monitored, validated and verified.

2. Section 6.2.1 stipulates application of the tool to address safeguards and shall monitor ongoing operation of the safeguards.

The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	6.2.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

New document:	ICR Tool for assessment of Environmental and Social Economic Safeguards of GHG projects
Paragraph	All document
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/tools/icr-tool-for-environmental-and-socio-economic-safeguards-and-sustainable-development

6.2 Provide evidence of how projects undertake a risk assessment for potential environmental and social impacts. Confirm this is included in the project documents that undergo validation or verification.

In the same section (4.2.1) projects need to minimize and avoid where possible damage to ecosystems. This is done through risk identification and further risk assessment.

The project shall minimize and, where possible, avoid negative environmental and social impacts.
…
Where applicable, project proponents shall minimize the risk of damage to ecosystems by considering:
(a) not introducing invasive species or allowing an invasive species to thrive through project activities.
(b) the use of non-native species over native species and their potential adverse effects.
(c) the use of fertilizers, chemical pesticides, biological control agents, and other inputs used by the project and their possible adverse effects.

See:

[ICR requirement document](#)

Changes from first to second assessment

See 6.1 above and Project proponents shall use the ICR Environmental & Socio-economic safeguard tool. Usage of the ICR tool is mandatory for project proponents which is incorporated in the ICR PDD template.

The ICR Tool works as a guideline for project proponents to assess and describe Environmental and Socio-economic Safeguards of their GHG project.

The proponent shall complete and respond to all questions and answer to the questionnaire provided by the ICR Tool. The ICR Tool provides project proponents with Critical indicators for assessing Environmental & Socio-economic impact and safeguards of their project.

Critical Indicators for Environmental safeguards shall be identified in the following categories;
● Air
● Land
● Water
● Natural resources

Critical indicators for Social safeguards shall be identified in the following categories:
● Health & safety
● Education
● Welfare
● Jobs

Critical indicators for Economic safeguards shall be identified in the following categories:
● Growth
● Energy
● Technology

Additionally, project proponents should consider when completing the ICR Environmental & Socio-economic safeguard assessment that safeguards should be verifiable by a VVB.

New document:	ICR Tool for assessment of Environmental and Social Economic Safeguards of GHG projects
Paragraph	All document
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F

	LmjtWPDS22TxVoeLAUw6%2FICR%20Tool%20for%20Assessment%20of%20Environmental%20and%20Socio-economic%20Safeguards%20v1.0.pdf?alt=media&token=20d60968-a540-41c2-a237-235c0b210ca7

Changes from last assessment

The Supervisory body published after conclusion of the public consultation a new SD Tool for use under the A6.4, Article 6.4 sustainable development tool v1.0. https://unfccc.int/process-and-meetings/bodies/constituted-bodies/article-64-supervisory-body/rules-and-regulations#Tools. Before publishing the final documentation ICR adopted the requirements of the Article 6.4 Tool to the ICR Tool.

The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR requirement document
Paragraph	6.2.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

New document:	ICR Tool for Environmental and Socio-economic Safeguards and Sustainable Development
Paragraph	1
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/tools/icr-tool-for-environmental-and-socio-economic-safeguards-and-sustainable-development

6.3 Provide evidence that the rules and requirements in Sections 6.1-6.2 are being followed.

Within ICR, evidence of compliance with project documentation and requirement adherence is available in PDDs, monitoring reports, and validation and verification

reports for projects and impacts. These documents serve as evidence that the projects have followed the stipulated requirements.

See for example:
https://www.carbonregistry.com/explore/projects/ad2dec62-85d2-46b9-884f-fd218a0453b0?+tab=benefits&tab=benefits
https://www.carbonregistry.com/explore/projects/ad2dec62-85d2-46b9-884f-fd218a0453b0?+tab=benefits&tab=documents

Additionally, the ICR program documentation page offers templates with pre-defined sections specifically designed for project proponents and Validation and Verification Bodies (VVBs). These templates guide users through the necessary steps and ensure that all relevant information is accurately reported, facilitating a streamlined and compliant documentation process.

See:

ICR template section:

ICR PDD template

ICR MR template

Change since last submission

ICR has strengthened the ICR completeness review process and further revised some ICR documentation to further safeguard adherence to ICR requirements. See for example ICR review reports produced for final registration and issuances.

AgroEcology Italy Reducing GHG Emissions and Increasing Carbon Sequestration in Italian Agriculture (carbonregistry.com)

Rahima Bay Sustainable Wetlands and Mangrove Conservation (RB-SWAM) (carbonregistry.com)

Dammam DR Sustainable Wetlands and Mangrove Conservation (DD-SWAM) (carbonregistry.com)

Revised document:	ICR validation and verification specifications
Paragraph	12.1
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FvJS5GWjMIyUpq2GnvDZt%2FICR%20validation%20and%20verification%20specifications%20v2.0.pdf?alt=

	media&token=937f71e3-f91e-41bd-967d-4b1ebde339a0

Revised document:	ICR process requirements
Paragraph	7.5, 8.4
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2Fbqe4NxsXnn3q9ASFh3Ph%2FICR%20Process%20Requirements%20v6.0.pdf?alt=media&token=329f0281-b954-4672-b189-d9fe7382ba5a

Revised documentation:	ICR - Procedure for Registration Approval of Projects at ICR
Paragraph	4.3
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-for-registration-approval-of-projects-at-icr

Revised documentation:	ICR Process - Monitoring and Verification
Paragraph	All document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-

	registration/monitoring-and-verification

New documentation:	ICR Process - Project review
Paragraph	All document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/registration/project-review

Change since last submission

Concerns were raised that the procedure had not been followed. The application of the newest version of the ICR requirement document was only published in October 2024 and has not been implemented yet. ICR has communicated with all proponents that have already registered their project to complete the ICR Tool for Environmental and Socio-economic Safeguards and Sustainable Development and upload to the registry. This was communicated directly to all proponents with already registered projects and other account holders in the ICR registry.

Some projects were registered when the ICR requirement document and process requirements were in version 3 or 4. The criteria for registration have improved since then, for example with improved requirements, improved guidelines and new supporting documents for validation and verification.

To respond to this observation the ICR will initiate a review of previously registered projects to safeguard their environmental integrity and align with current procedures of project review. ICR has further requested the proponents that all currently registered projects need to complete the Tool and submit to the ICR. In addition, ICR has recommended that all projects update their documentation to align with the version 6 of the ICR program.

See announcement on ICR documentation page:
https://documentation.carbonregistry.com/documentation

The following documents have now been published after the public consultation and findings from the second assessment.

Revised document:	ICR validation and verification specifications

Paragraph	12.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

Revised document:	ICR process requirements
Paragraph	7.5, 8.4
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

7. Stakeholder Considerations

7.1 Provide evidence of the publicly available stakeholder engagement procedure that includes, at minimum:

7.1.1 At the programme level:
- **a definition of "stakeholder"**
- **a requirement for 30-day public consultation for new programme documents (or during revisions to programme documents)**
- **a requirement for 30-day public consultation during methodology development**

7.1.2 At the project level:
- **project consultation documents available in relevant local language(s), as necessary for effective consultation with local stakeholders**
- **a process by which results of stakeholder engagement is included in documents that undergo validation and verification**
- **a defined process on how local consultations must be conducted**

ISO 14064-2 doesn't define stakeholders specifically but defines interested parties.
Interested party
person or organization that can affect, be affected by, or perceive itself to be affected by a decision or
activity
EXAMPLE Person or organization that is affected by or interested in the development or implementation of a GHG project (3.2.3).

ICR has, however, adopted the term stakeholder into its documentation. A stakeholder is currently not specifically defined in ICR definitions.

ICR's QMS outlines a structured procedure for public consultation and managing change, detailing the development process of the ICR program. This procedure mandates public consultation for program-related documents, including ICR definitions, the ICR requirement document, and ICR validation and verification specifications. Methodologies under the ICR methodology approval process are subject to a 28-day public consultation period.

To date, all public consultations conducted by ICR have been in the organization's operating language, without translations into other languages. However, ICR remains open to considering translations or requiring methodology developers to provide documentation in the local language should the need arise.

For projects, proponents are required to engage with local stakeholders and facilitate a 30-day public commenting period, as outlined in section 4.2.1 of the ICR requirement document. Project proponents must identify and address potential negative environmental and socio-economic impacts, ensuring meaningful engagement with local stakeholders throughout the project's design and implementation phases. A continuous communication process with local stakeholders is essential, with proponents expected to address all received comments and demonstrate implemented

actions to the VVB. Stakeholders are encouraged to continue submitting comments, which should be considered during subsequent verifications.

Recognizing the diverse nature of cultures, languages, project types, and locations, ICR does not prescribe a specific format for public consultation. Instead, it grants proponents the flexibility to determine the most appropriate form and medium for consultation, while the VVB assesses the effectiveness of these consultations in engaging and informing local stakeholders.

Public stakeholder procedure (Needs access)
Management of change (Needs access)
ICR methodology approval process
Previous public stakeholder consultation methodologies
Previous public stakeholder consultation program

Changes from first to second assessment
ICR has improved its stakeholder consultation processes and procedures. ICR has completed the process for public consultation in its QMS, also outlining other procedures where consultation is needed in the ICR procedure on Management of Change. On ICR's public consultation page ICR has further provided detailed information about public consultation. ICR has revised the ICR definitions and defined both Interested party and stakeholder interchangeably. Documentation relating to public consultation now stipulates a 30 days minimum period of public consultation. Further outlined in the ICR public consultation page. After consultation processes are included in ICR management of change on consideration and publication of public comments as well under the ICR methodology approval process where public comments are shared with VVBs and methodology developers for consideration.

Revised documentation:	ICR definitions
Paragraph	Stakeholder, interested party
Link	PC

Revised documentation:	ICR process - Public consultation
Paragraph	All
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/ghg-program-management/public-consultation

Revised documentation:	ICR process - Methodology approval
Paragraph	All
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/ghg-program-management/methodology-approval

Revised documentation:	ICR Procedure - Customer Feedback and Complaints
Paragraph	All
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-customer-feedback-and-complaints

Revised documentation:	ICR Procedure - Management of Change
Paragraph	4
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-customer-feedback-and-complaints

Revised documentation:	ICR methodology approval process
Paragraph	1.6

Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfldoGcZZdvap67xjb5h1%2Fuploads%2FPYzwoHM6qhAWl37edsQ8%2FICR%20Methodology%20Approval%20Process%20v3.0.pdf?alt=media&token=0c025e38-813f-4a40-832f-b8983ee798ac

Changes since last submission

In the published version 6 of the ICR requirement document, guidelines are provided on the approach to conducting the stakeholder consultation itself. In section 6.2.1.1 of the ICR requirement document v6.0 ICR stipulates specifically guidelines for the stakeholder consultation, primarily for identifying different stakeholder groups. The ICR has made amendments in the final version to guide proponents on agenda items for the local stakeholder consultation to align with ICROA requirements.

The final version of the ICR requirement document outlines the necessary steps proponents shall follow when conducting stakeholder consultations. Requirements relating to stakeholder consultation have been enhanced now with minimum agenda items for the consultation.

"During the LSC the proponent shall safeguard and respect inclusiveness, cultural diversity and knowledge. The LSC shall include at minimum:
1. Presentation about the PDD/PDDMR, implementation, impacts, risk assessment and effect on local stakeholder groups.
2. Presentation about the assessment of environmental and socio-economic safeguards.
3. Relevant statutory requirements in the host country(ies), e.g. workers' rights, environmental legislation.
4. Presentation about impacts on property rights.
5. Presentation about benefit sharing where relevant.
6. Registration process and involvement of VVBs.
7. Information about ongoing communication, grievance mechanism and consultation.
"

Further to guide the proponent for transparently addressing comments the PDD/PDDMR template includes a table for the proponent to fill in.
Note: The ICR registry platform is being developed to make future engagement easier, allowing direct communication between stakeholders, proponents, and VVBs, as well as enabling public comments on project pages by verified users (KYCd).

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR definitions
Paragraph	Stakeholder, interested party
Link	https://documentation.carbonregistry.com/documentation/icr-program/definitions/icr-definitions-v3.1

Revised documentation:	ICR requirement document
Paragraph	6.2.1.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised documentation:	ICR methodology approval process
Paragraph	1.6
Link	https://documentation.carbonregistry.com/documentation/icr-program/methodology-development/procedural/icr-methodology-approval-process-v3.0

7.2 Describe how stakeholder comments are transparently addressed at both the programme and project levels.

Following each public stakeholder consultation, ICR commits to publishing all comments received. For those comments that contribute meaningful input to the consultation, ICR not only responds but also takes these contributions into account when finalizing the documentation.

In the case of methodology public consultation, ICR ensures transparency by sharing all received comments with both the methodology developer and the contracted VVB responsible for the methodology's validation. This collaborative approach facilitates a comprehensive consideration of stakeholder feedback in the refinement of methodologies.

Moreover, ICR embraces an open and ongoing dialogue with stakeholders by allowing for continuous consultation. This approach enables stakeholders to submit their

comments even after the formal public consultation period has concluded, ensuring that the development process remains inclusive and responsive to the broader community's insights and concerns.

See
[ICR methodology approval process](#)

Changes from first to second assessment
Please see section 7.1 above.

Changes since last submission

The published ICR requirement document after consideration of comments received, outlines the necessary steps proponents shall follow when conducting stakeholder consultations.

As per section 6.2.1.1 Local stakeholder consultation, projects shall undergo a minimum of 30-day public comment period with local stakeholders and the project proponent shall implement a process of continuous communication.

The project proponent shall respond to all comments received and demonstrate mitigation actions implemented. Stakeholders may continue to submit comments during the crediting period, which shall be considered during subsequent verification. The proponent shall conduct the consultation in the local language.

Also, PDD/PDDMR template includes a table for the project proponent to fill in and transparently address the comments.

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR requirement document
Paragraph	6.2.1.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised documentation:	ICR definitions
Paragraph	Stakeholder, interested party
Link	https://documentation.carbonregistry.com/documentation/icr-

	program/definitions/icr-definitions-v3.1

Revised documentation:	ICR methodology approval process
Paragraph	-
Link	https://documentation.carbonregistry.com/documentation/icr-program/methodology-development/procedural/icr-methodology-approval-process-v3.0

7.3 Provide evidence that the procedure in Section 7.1 is being followed.[2]

On the ICR website, under the section dedicated to public stakeholder consultation, visitors can access records of previous consultations. This section includes the publication of comments received during those consultations, illustrating ICR's commitment to transparency and ongoing dialogue. Additionally, it provides guidance on how stakeholders can continue to submit their comments, ensuring that the consultation process remains open and accessible for continued input from the public. This feature facilitates an inclusive approach, allowing ICR to consider and incorporate stakeholder feedback continuously.

Previous public stakeholder consultation methodologies
Previous public stakeholder consultation program

Changes from first to second assessment
Further clarification, ICR stipulates in section 6.2.1 of the ICR requirement document that projects shall respond to all comments received and demonstrate mitigation actions implemented. Further stakeholders may continue to submit comments which shall be considered during subsequent verification. ICR under section 14.4 of ICR Process requirements may submit comments about any project activities. Such comments shall be submitted to admin@carbonregistry.com. Comments received are shared with the project proponent, and the VVB performing the following validation/verification.

ICR has revised its ICR requirement document relating to local consultation providing minimum requirements for consideration and that the consultation shall be conducted in the local language.

In addition, the stipulation ICR has revised the ICR validation and verification specifications addressing means of validation and verification of any public comments received.

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[2] This requirement applies to both programme-level and project-level stakeholder consultations.

In addition, ICR has revised its procedures for completeness review, where any oversight by the PP or VVB should be identified and addressed.

Revised documentation:	ICR requirement document
Paragraph	6.2.1.1
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2F5ecDWFW3LcUpu819e8RO%2FICR%20Requirement%20Document%20v6.0.pdf?alt=media&token=3518c344-0e0e-4079-8bc8-89029523163d

Revised documentation:	ICR validation and verification specifications
Paragraph	6.3.1.1
Link	https://2441265052-files.gitbook.io/~/files/v0/b/gitbook-x-prod.appspot.com/o/spaces%2FfIdoGcZZdvap67xjb5h1%2Fuploads%2FvJS5GWjMIyUpq2GnvDZt%2FICR%20validation%20and%20verification%20specifications%20v2.0.pdf?alt=media&token=937f71e3-f91e-41bd-967d-4b1ebde339a0

Revised documentation:	ICR - Procedure for Registration Approval of Projects at ICR
Paragraph	4.3
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.2-procedures/icr-procedure-for-registration-approval-of-projects-at-icr

Revised documentation:	ICR Process - Monitoring and Verification
Paragraph	All document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/monitoring-and-verification

New documentation:	ICR Process - Project review
Paragraph	all document
Link	https://documentation.carbonregistry.com/icr-quality-management-system/icr-quality-management-system/4.-context-of-the-international-carbon-registry/4.4-icr-s-qms-and-its-processes/4.4.1-processes/project-registration/registration/project-review

Changes since last submission

The following documents have now been published after the public consultation and findings from the second assessment.

Revised documentation:	ICR requirement document
Paragraph	6.2.1.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/criteria/icr-requirement-document-v6.0

Revised documentation:	ICR validation and verification specifications
Paragraph	6.3.1.1
Link	https://documentation.carbonregistry.com/documentation/icr-program/validation-and-verification/criteria/icr-validation-and-verification-specifications-v2.0

Revised documentation:	ICR process requirements
Paragraph	7.5, 8.4
Link	https://documentation.carbonregistry.com/documentation/icr-program/project-development/procedural/icr-process-requirements-v6.1

8. Scale

8.1 Provide evidence that the Programme has issued[3] carbon credits from at least two projects.

Under https://www.carbonregistry.com/explore/credits all ex-ante ICCs and ex-post may be found.

Changes from first to second assessment
No changes

Changes since last submission
ICR has updated the registry platform for increased usability of the platform. All credit information can be found under each project. In addition to that information relating to transaction, issuances, transfers, retirements, cancellations are also available

Carbon Registry | Projects Overview
Carbon Registry | Carbon Credits Overview
Carbon Registry | Transactions Table

8.2 Confirm whether the Programme has registered 10+ projects and issued 100,000+ t CO2e in carbon credits.
In the below table list of projects in the process of registering with the ICR.

Status	Number of Projects
Under development	30
Under validation	45
Validated	13
Total	**80**

In total approximately 700 k t CO2-e are verified ex-post ICCs. In total, issued validated ex-ante ICCs that have been issued are approx. 52 k t CO2-e.

For information purposes projects following the Icelandic Forest Carbon Code approx. 26 k t CO2-e ex-ante FCCs have been issued.

ICR projects can be found in the ICR registry:

https://www.carbonregistry.com/explore/projects

Changes from first to second assessment

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[3] "Issued" refers to ex-post credits.

Since last submission three projects have been registered and issued 8,054.4 ex-post ICCs and 3,922 ex-ante ICCs.

Changes since last submission
At the submission of the application total issued credits are 1.9 m tCO2-e ex-post ICCs. Retired ex-post ICCs are 3.8 k t CO2-e and canceled ex-post ICCs 313 k tCO2-e. Available ex-post ICCs are 1.537 m tCO2-e.

Issued ex-ante ICCs are 56,732, cancelled ex-ante ICCs are 52,810[4], available ex-ante ICCs 3,922 t CO2-e.

Status	Number of Projects
Under development	22
Under validation	46
Validated	11
Closed	1
Retracted	9
Total	**89**

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[4] Credits were canceled as the proponent withdrew from the ICR program. No ex-ante ICCs were transferred from his account thus no risk of non-performance event.