PROBA STANDARD

Review #3

17 July 2025

Version 1.1

CLIMATE FOCUS

SUMMARY

The following document outlines the third review of whether the Proba Standard (herein referred to as the Programme) meets ICROA's Carbon Crediting Programme Endorsement Review Criteria (version 3.5). This review was carried out between July 11 - 17, 2025. It is based on revised documents submitted to ICROA on July 9, 2025, and the materials used for the first and second review.

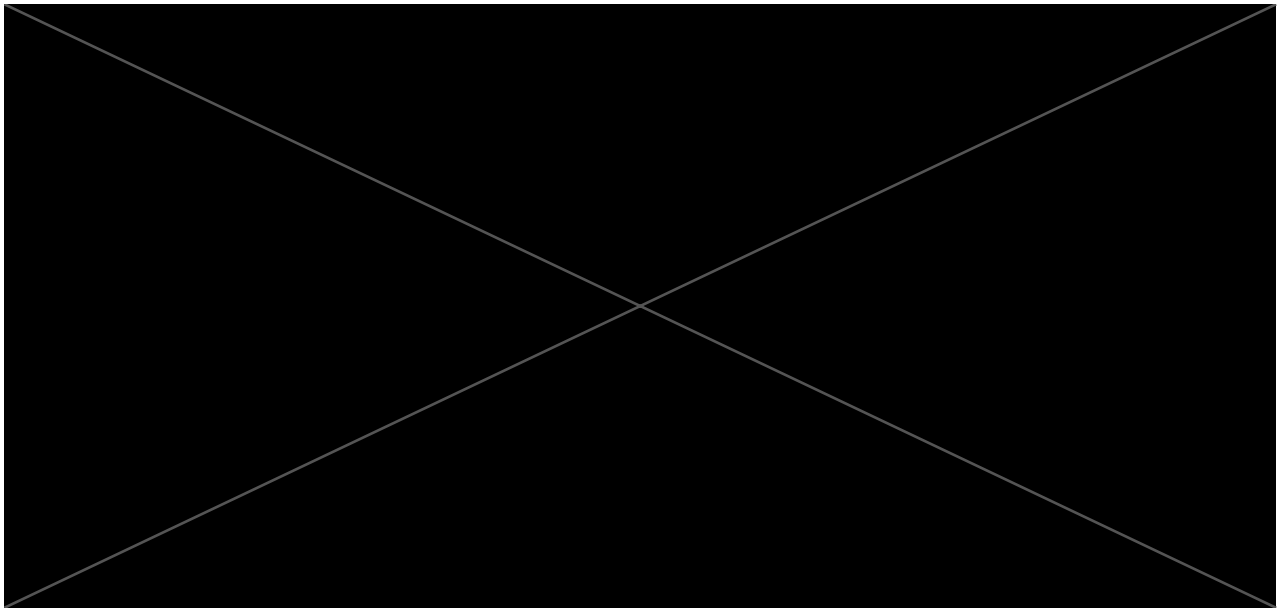
The second review was carried out between March 24th, 2025, and May 8th, 2025. It is based on revised documents submitted to ICROA on March 24th, 2025, and the materials used for the first review. Follow up questions were shared with the Programme via email on May 15th. Responses to these questions were received on May 22nd.

The first review was carried out between October 9th and December 16th, 2024, and was based on the documents submitted to ICROA by the Programme on August 30th, 2024. Clarification questions were emailed to the Programme on November 18th, 2024, and answers to these questions were received on November 18th, 2024.

The Programme meets all criteria for conditional endorsement, the reasons for which are outlined in the summary table below.

Requirement	Outcome	Explanation
1) Independence	●	Not reassessed (criteria fulfilled in Review #2)
2) Governance	●	Not reassessed (criteria fulfilled in Review #2)
3) Registry	●	Full project documentation is now available for all projects currently listed on the registry. Proba has adjusted its procedures to ensure that monitoring reports are published on the registry.
4) Validation and verification	●	Not reassessed (criteria fulfilled in Review #2)
5) Carbon Crediting Principles	●	Unique, real, permanent and measurable: not reassessed (criteria fulfilled in Review #1 and #2). *The Additionality criteria were met in review #1. However, due to a change in ICROAs criteria, the criteria are opened again in review #3.* The Standard Document sets out rules regarding the additionality of projects. All projects are required to demonstrate regulatory, financial and common practice

Requirement	Outcome	Explanation
		additionality. Furthermore, Proba has an Additionality assessment in place that guides projects through the assessment and prescribes the steps that need to be taken to demonstrate additionality.
6) Environmental and social impacts	●	Not reassessed (criteria fulfilled in Review #1)
7) Stakeholder considerations	●	Not reassessed (criteria fulfilled in Review #2)
8) Scale	●	Three projects are currently registered. Two projects have issued credits totaling a combined 13,947 tons CO_2e issued. Both the number of projects registered, and the volume of issuances are below ICROA's threshold for full endorsement. However, the Programme is seeking conditional endorsement before reaching ICROA's threshold for full endorsement.
9) Additional considerations	●	*The Additional considerations criterion was met in review #1. However, due to a change in ICROAs criteria, the criterion is opened again in review #3.* Proba confirms it is not involved in any open litigation.



PROBA STANDARD

Review #2

29 May 2025

Version 1.0

CLIMATE FOCUS

SUMMARY

The following document outlines a second review of whether the Proba Standard (herein referred to as the Programme) meets ICROA's Carbon Crediting Programme Endorsement Review Criteria (version 3.1). This review was carried out between March 24th, 2025, and May 8th, 2025. It is based on revised documents submitted to ICROA on March 24th, 2025, and the materials used for the first review.

Follow up questions were shared with the Programme via email on May 15th. Responses to these questions were received on May 22nd.

The first review was carried out between October 9th and December 16th, 2024, and was based on the documents submitted to ICROA by the Programme on August 30th, 2024. Clarification questions were emailed to the Programme on November 18th, 2024, and answers to these questions were received on November 18th, 2024.

[redacted]

Requirement	Outcome	Explanation
10) Independence	●	Updated Programme documents outline procedures for preventing Conflicts of Interest (COI) and managing them as they arise. The Programme has clarified that while it does provide project developers with some basic support, these do not qualify as the Programme acting in the role of a project developer.
11) Governance	●	The governance structure of the Programme is clearly laid out in publicly available documentation. The roles and responsibilities of decision making bodies and the decision making process of these bodies are clearly outlined within the terms of reference for each. The procedures for methodology development and review are publicly available, and meet ICROA's requirements. The complaints procedure has been updated such that complainants are no longer expected to cover the costs of the complaints raised.

[redacted]

Requirement	Outcome	Explanation
13) Validation and verification	●	The Programme has approved three Validation and Verification Bodies (VVBs).
14) Carbon Crediting Principles	●	Unique, Real, Permanent, and Additional: Not reassessed (criteria fulfilled in Review #1) Measurable: The Programme has updated documents to clarify that product-based methodologies are not permitted.
15) Environmental and social impacts	●	Not reassessed (criteria fulfilled in Review #1)
16) Stakeholder considerations	●	Stakeholder consultation processes are in place. Programme documents define stakeholders and require public consultations for Programme revisions and projects. This also requires local consultations. The one active project which was established after the introduction of Programme level requirements for stakeholder considerations and has issued credits provides details of consultations and feedback gathered in its registry documents.
[redacted]		
18) Additional considerations	●	Not reassessed (criteria fulfilled in Review #1)

[redacted]

PROBA STANDARD

Review #1

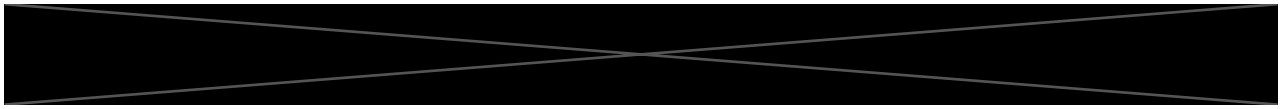
29 January 2025

Version 1.2

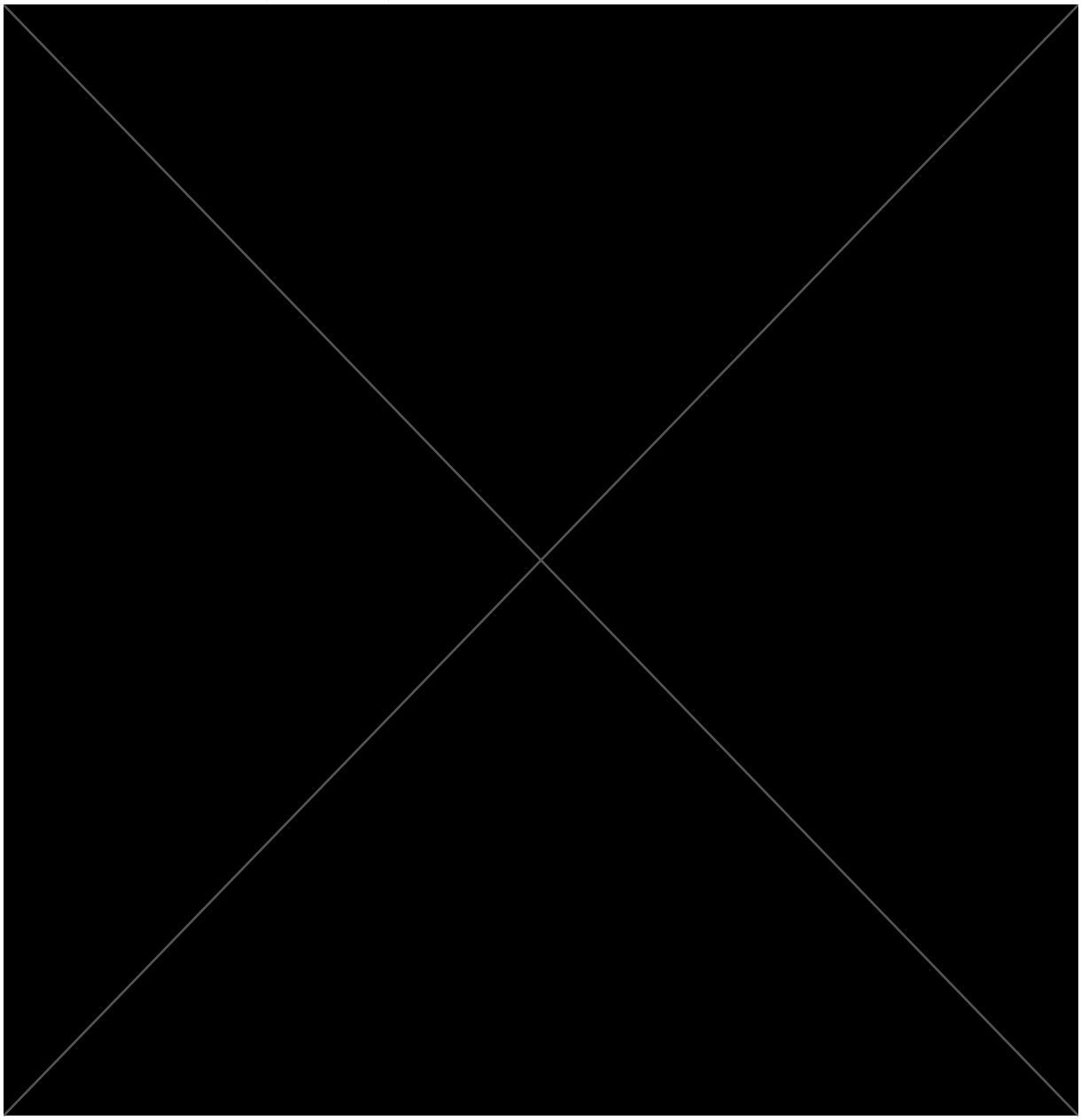
CLIMATE FOCUS

SUMMARY

The following document outlines a review of whether the Proba Standard (herein referred to as the Programme) meets ICROA's Carbon Crediting Programme Endorsement Review Criteria (version 3.1). The review was carried out between October 9th and December 16th, 2024, and is based on the documents submitted to ICROA by the Programme on August 30th, 2024. Clarification questions were emailed to the Programme on November 18th, 2024, and answers to these questions were received on November 18th, 2024.



Requirement	Outcome	Explanation



Requirement	Outcome	Explanation
[redacted]		
24) Environmental and social impacts	●	Do no harm safeguards are in place across the Programme. Project developers are required to assess and mitigate potential risks. All current projects include risk assessments.
[redacted]		
27) Additional considerations	●	No reputational concerns surrounding the Programme were found online.

[redacted]

CARBON CREDITING PROGRAMME ENDORSEMENT APPLICATION FORM

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

Name of Programme	Proba Standard
Contact Person	Rutger Beens
Contact Email	rutger@proba.earth
Date of Submission	09-07-2025
Version of Submission	3
Brief Overview of Programme (max 150 words)	Proba provides a platform, a standard and methodologies in order to certify GHG projects. Proba helps companies and/or project developers to convert their climate action into tradable carbon credits. This creates new revenue streams which help co-finance GHG projects. The carbon credits can be used to reduce scope 3 emissions if they are claimed by supply chain participants or to compensate for emissions if they are claimed in unrelated value chains. Proba makes sure the GHG impact of the project is real, additional, independently verified, unique, not counted or claimed already, and doesn't have negative side effects to (local) environment and communities.

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.

All our staff, management board and contractors are contractually bound to our Code of conducts which contain rules and guidelines on identifying and dealing with conflicts of interest. Our employment and contractor contracts are not publicly available, but our template can be requested for review. Our Code of conduct for employees can be found on our public document library (https://proba.earth/hubfs/Downloads/Proba_code_of_conduct.pdf). For other code of conducts please see our doc library: https://proba.earth/document-library

Update 21/03/2025:
Proba has updated section 1.7 of the Proba Standard Quality and Governance document to explain the process of identifying and managing COIs more clearly
https://proba.earth/hubfs/Downloads/Proba_Standard_Quality_Governance.pdf
Also, Proba has created a new version (1.2) of the Code of Conduct for employees and contractors since the previous application for endorsement. Changes can be found in the change log, but include

- *Addition of awareness section under conflict of interest standards.*
- *Addition of "Identification and reporting of conflict of interest" section and*
- *Addition of "Measures for managing conflict of interest".*
- *Revision of the Outside Interests section.*

***Note:** Employees will be asked to adhere to the updated Code of Conduct during the annual review. The Conflict of Interest (COI) section has been clarified but remains materially unchanged.*

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.

Our signed employment and contractor contracts may be reviewed during an audit.

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.

During onboarding, the VVB is required to agree to our Code of conduct for VVBs, which contains rules and guidelines on identifying and dealing with conflicts of interest. This Code of conduct can be found on our public

document library (https://proba.earth/hubfs/Downloads/Proba_code_of_conduct_VVBs.pdf).

On a yearly basis, all of Proba's employees and contractors are required to confirm that they have reported every possible breach of our Code of conduct (including conflict of interests) to the management board. An audited declaration document is available upon request.

Update 21/03/2025:
Proba has created a new version (1.2) of the Code of Conduct for VVBs since the previous application for endorsement. Changes can be found in the change log and include a major revision of the conflict of interest section.

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.
See "Commercial Independence" in section 1.3 of the Proba Standard Quality & Governance document and the section "Offers and prices for Carbon Credits" in our Terms & Conditions. Proba is in no situation the owner nor the seller of the Carbon Credits issued. Proba has no role in the sale of carbon credits. We hereby confirm that Proba does not pursue buyers, act in a brokering capacity, or actively market carbon credits. Proba does help its customers/project developers with finding potential partners (such as brokers, traders and market places) who can help them with finding a market for their carbon credits.
Proba's revenue structure is based on an issuance fee per Carbon Credit (customer contracts for credit issuing can be reviewed as evidence). (https://proba.earth/hubfs/Downloads/Proba_Standard_Quality_Governance.pdf) (https://proba.earth/hubfs/Downloads/Proba_terms_and_conditions.pdf)

Update 21/03/2025:
Proba has updated the section "Commercial Independence"in the Proba Standard Quality & Governance document version 1.1. Proba's support to customers is better explained and independence safeguards have been added.

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.
See "Commercial Independence" in section 1.3 of the Proba Standard Quality & Governance document. Proba is in no situation the owner of the Carbon Credits issued in the Proba Platform. Proba provides support to customers in designing their GHG Project, but never acts in the capacity of project developer.

Update 21/03/2025:
Proba does not:

- *Advise on project structuring with the intent of maximizing credit issuance.*
- *Participate in the design, execution, or direct financing of GHG projects.*
- *Influence methodologies to favor higher credit issuances.*

Additionally, see section 4.2 of the Proba Standard Quality & Governance document: "Proba only provides technical facilitation in the project design phase. Proba may offer guidance on project eligibility criteria and methodology compliance; it does not design, manage, or directly implement GHG projects." (https://proba.earth/hubfs/Downloads/Proba_Standard_Quality_Governance.pdf)

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.

See "Commercial Independence" in section 1.3 of the Proba Standard Quality & Governance document and the section "Offers and prices for Carbon Credits" in our Terms & Conditions. Proba has no role in the sale of carbon credits. We hereby confirm that Proba does not pursue buyers, act in a brokering capacity, or actively market carbon credits. We do help our customers/project developers with finding potential partners (such as brokers, traders and market places) who can help them with finding a market for their carbon credits.
(https://proba.earth/hubfs/Downloads/Proba_Standard_Quality_Governance.pdf) (https://proba.earth/hubfs/Downloads/Proba_terms_and_conditions.pdf)

Update 21/03/2025:
Proba has updated the section "Commercial Independence" in the Proba Standard Quality & Governance document version 1.1. Here we have extended our internal rules and principles to ensure (commercial) independence in more detail.

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.

Proba does not offer any marketplace or marketplace functionality.

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.

Visit our governance page on our website for an extensive overview of our governance structure: https://proba.earth/proba-governance
The organisation chart can be accessed via this link:
https://proba.earth/hubfs/Downloads/Organizational_chart.pdf

The Board members can be found on the about page:
https://proba.earth/about-proba

Responsibilities of the board include:
"The Proba Management Board (PMB) is composed of the Directors of Proba. It is responsible for accepting new clients and projects, strategy development, and general management. Please refer to the About page for an overview of members of the PMB.

The management board is responsible for assessing the eligibility of GHG Projects. It does so by assessing the GHG Project against the Proba Standard."
(https://proba.earth/hubfs/Downloads/Proba_Standard_Quality_Governance.pdf)

Update 21/03/2025:
Terms of Reference of the Proba Management Board have been created which describe the roles and responsibilities of the management board.
https://proba.earth/hubfs/Downloads/TOR_Proba_Management_Board.pdf

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

Sections 1.4, 1.5 and 1.6 within the Proba Standard Quality & Governance document describe the appointment process of the main three entities within Proba: Proba Advisory Board, Proba Management Board and the Proba Technical Committee.

Proba Advisory Board
"The board is initially appointed by the Proba Management Board, but in time, only Advisory Board members can nominate new members."

Proba Management Board
"Appointing management board members
The General Meeting of shareholders shall appoint, dismiss or suspend Management Board members. The General Meeting decides by simple majority. Certain management decisions (as set out in Proba's shareholders agreement) require the approval of the Investors Majority."

Proba Technical Committee
"The Proba Technical Committee is initially appointed by the Proba Management Board, but in time, both members of the Proba Technical Committee and the Proba Management Board can nominate new members."
(https://proba.earth/hubfs/Downloads/Proba_Standard_Quality_Governance.pdf)

Update 21/03/2025:
Terms of Reference of the Proba Management Board have been created which also describes the appointment process of the management board.

https://proba.earth/hubfs/Downloads/TOR_Proba_Management_Board.pdf

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.

Yes. Proba confirms that it complies with all Dutch and European laws and regulations.

The Code of conduct for employees and contractors has the purpose of complying with laws and regulations.
(https://proba.earth/hubfs/Downloads/Proba_code_of_conduct.pdf)

A snippet from the policy statement: "Proba has the responsibility to prevent the misuse of information by all employees and other (third) parties acting on Proba behalf, positions or other activities and to comply with all applicable Dutch laws and regulations."

In the management agreements of Proba, each manager is obliged to act in accordance with all applicable laws and regulations. In case a manager doesn't comply, Proba may decide to terminate the contract (management agreement is non-public information and may be shared for auditing purposes).
Snippet from contract (article 1.5): "The Management Company, as statutory director of the Client, shall fulfil all obligations assigned to it by law, the articles of association of the Client and the Management Board Regulations (if any) of the Client. The Management Company shall promote the interests of the Client and its affiliated companies as much as possible."

Our Standard requires each project to comply with applicable rules and legislation. See section 3.2 Project legal compliance: "Proba works exclusively with projects that comply with international conventions, the existing laws of the host country or region, especially regarding its land use, rural and environmental issues."
(https://proba.earth/hubfs/Product/The_Proba_standard.pdf)

In the exceptional case that our program would conflict with applicable law, the applicable law takes precedence as described in clause 9 of article General provisions in our terms and conditions: "If and insofar as any part or provision of these Terms should appear to be in conflict with any mandatory provision of national or international law, it shall be deemed not to have been agreed and the parties shall continue to be bound by these Terms in all other respects. The parties will then consult to agree on a new provision that corresponds as closely as possible to what the parties have intended."
(https://proba.earth/hubfs/Downloads/Proba_terms_and_conditions.pdf)

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.

As the Terms of Reference of the Proba Standard Advisory Board and the Proba Technical Committee illustrate, the Proba Technical Committee makes proposals for change to the Proba Standard Advisory Board in order to improve the Proba Standard and its related processes. The Proba Standard Advisory Board shall meet quarterly. Additional meetings may be scheduled as needed, based on the urgency of issues or at the request of the Chair. Decisions within the Proba Standard Advisory Board shall be made by consensus whenever possible. If consensus cannot be reached, decisions will be made by a majority vote of the members present. Only Proba Standard Advisory Board members have the right to vote on decision items during Standard Advisory Board meetings. In the event of a tie, the Chair can exercise the casting vote.
In case a specific technical issue arises, the Proba Standard Advisory Board may consult the Proba Technical Committee for advice on this topic. However, the final decision shall always be made by the Proba Standard Advisory Board.
(https://proba.earth/hubfs/Downloads/TOR_Proba_Standard_Advisory_Board.pdf)
(https://proba.earth/hubfs/Downloads/TOR_Proba_Technical_Committee.pdf)

Update 21/03/2025:
Terms of Reference of the Proba Management Board have been created which describes the decision making process of the Proba Management Board.

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).
The Proba Standard Quality and Governance document describes the policies and procedures that Proba follows to continuously improve the quality of the Proba Standard and all supporting processes.
(https://proba.earth/hubfs/Downloads/Proba_Standard_Quality_Governance.pdf)

Update 21/03/2025:
Proba has created a new version of the Proba Standard Quality & Governance document. Changes have been explained in the change log of version 1.1.

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.**
  The Proba Standard development and review process is described in the Proba Standard Quality & Governance document in section

2 (https://proba.earth/hubfs/Downloads/Proba_Standard_Quality_Governance.pdf)

Appointment of advisory board, management board and technical committee is specified in the sections 1.4, 1.5 and 1.6 of the Proba Standard Quality & Governance document.
Conflict of interest and grievance mechanisms are described in sections 1.7 and 1.8

Methodology approval and development process is described in section 3 of the Proba Standard Quality & Governance document and in the separate procedure: https://proba.earth/hubfs/Downloads/Methodology_approval_and_development.pdf

Update 21/03/2025:
Proba has created a new version of the Proba Standard Quality & Governance document (version 1.1). Proba's role in project design has been clarified to eliminate potential "perverse" incentives and ensure separation from project development activities.The other changes have been explained in the change log of the new version.

Proba created a new version of the Methodology Approval and Development process (version 1.2). Changes include:

- *Improved the approval process of third party methodologies*
- *Added process for specific knowledge that lies beyond the expertise of the PTC*
- *Updated methodology development process to allow for scientific review instead of expert review*
- *Updated the annual review process of approved methodologies*

Proba has created a new version of the complaints procedure (version 1.1). The process for filing a complaint has been updated in order to address the concern related to costs.

Proba has created Terms of Reference of the Proba Management Board which describes the decision making process of the Proba Management 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.**
  Methodology development procedures can be found in the Methodology development and approval process on the Proba website: https://proba.earth/hubfs/Downloads/Methodology_approval_and_development.pdf

Section 5.1 discusses the steps in the methodology development process and indicates when public consultation and an expert review are executed in the process. Methodologies developed by Proba will be reviewed every five years. A review will also be made when significant changes have occurred, such as regulation, technologies, scientific progress or other relevant market developments.

Update 21/03/2025

Proba created a new version of the Methodology Approval and Development process (version 1.2). Changes include:

- *Improved the approval process of third party methodologies*
- *Added process for specific knowledge that lies beyond the expertise of the PTC*
- *Updated methodology development process to allow for scientific review instead of expert review*
- *Updated the annual review process of approved methodologies*

- **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.**
  The Proba complaints procedure is available via the document library on the Proba website:
  https://proba.earth/hubfs/Downloads/Proba_complaints_procedure.pdf

  Update 21/03/2025
  Proba has created a new version of the complaints procedure (version 1.1). The process for filing a complaint has been updated in order to address the concern related to costs.

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.

Within the Proba Standard it is possible to use open and publicly available methodologies which are approved by other GHG programs. Proba has a procedure in place to approve these methodologies, as explained in section 4 of the methodology approval and development process
Section 6 describes the review and update process, for methodologies from third parties that are approved by Proba. Proba will screen the methodology and the methodology developer on any negative news once a year. During this annual check, Proba will also check if there is a new version of the methodology available.
https://proba.earth/hubfs/Downloads/Methodology_approval_and_development.pdf

Update 21/03/2025
Proba created a new version of the Methodology Approval and Development process (version 1.2). Changes include:

- *Improved the approval process of third party methodologies*
- *Added process for specific knowledge that lies beyond the expertise of the PTC*
- *Updated methodology development process to allow for scientific review instead of expert review*
- *Updated the annual review process of approved methodologies*

3. Registry

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

As described in the Proba Standard, section 5.1:
"The Carbon Credit Registry is hosted by and property of Proba."

"Proba commits to regularly updating the Registry with the latest statuses, Projects, and Credit issuance. The registry gets updated automatically upon issuing or changes in Credits."

The Proba registry can be accessed via https://registry.proba.earth/

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.

Visit https://registry.proba.earth/ and select one of the projects listed on the page. On each project page project descriptions, project documents and other project information is provided.

Update 21/03/2025:
Proba has improved the links on our website to make project documentation easier to be found, including the outcome of public consultations.

On project level, Proba has asked the project developers of the first two projects to make the public project documentation consistent with the Proba Standard.

Cashew Captures Carbon Benin project:

- *Monitoring reports: As indicated on the Proba registry, the Cashew Captures Carbon Benin project follows the guidelines of the Proba Standard, but was started before the completion of the 1.0v of the Proba Standard. Proba has asked the project developer to add monitoring reports to the Registry. This monitoring report is a statement that refers to the documents that have been used for the verification. These documents are not publicly available, as they contain personal information about participants.*

- *Operational check document: Proba has added an operation check document for the verification of the yields of 2024. This document was not available in the initial review.*

NatureVest project: Since the previous review, the project developer has added the relevant documentation supporting the 2024 yields. Proba has added an operation check document for the verification of the yields of 2024.

Dealin.Green project:

- *During the previous review, the 2024 yields were not verified yet. Only the estimated yields should have been shown on the registry. The realized yields were imported on the platform by the project developer, but were not verified yet by the VVB. They should not have shown up as issued credits on the registry. We have reviewed our code and implemented a change for this bug. To emphasize no credits were issued for this project at the moment of the initial review, a code change in this table of the Proba registry led to this bug.*
- *In the meantime the verification of the yields has been completed and the project documentation is available now.*

Update 09/07/2025:

- *The Project Developer of the Dealin.Green project has uploaded a public facing monitoring report on the registry as part of last year's verification.*
- *Quality improvement: Proba Standard Quality and Governance has been updated (version 1.2). The Proba operational check templates have been split up in a post validation version and a post verification version. The post verification version now explicitly mentions a public version of a monitoring report (see Section 4.2 Proba Project Lifecycle and relevant sections on Proba Operational Checks).*
- *Policy improvement: The Proba Standard has been updated (version 1.3). Sections on GHG Yield Verification (Section 2.5), monitoring procedures (Section 4.2) and transparency (Section 5.4) have been updated to illustrate to project developers and other stakeholders that a public facing monitoring report is required and how the project developer can deal with privacy issues.*

Updated section 2.5: "To facilitate the Verification process, the Project Developer must prepare a Monitoring Report summarizing all monitoring activities conducted during the relevant Yield Period, presenting the collected monitoring data, and demonstrating the application of the selected methodology. This Monitoring Report must be submitted through the Proba platform or registry, where it is made available to the VVB ahead of each Verification Event."

Update section 4.2: "The Project Developer must submit the full Monitoring Report to the Proba Registry upon each Yield Verification and ensure it is made available to the VVB for verification purposes. For transparency, a public-facing version of the Monitoring Report must always be published on the Proba Registry. In cases where the report contains sensitive or confidential information, a separate public-facing version must be prepared, including a clear statement that certain content has been withheld due to its sensitive nature. Otherwise, the full version may serve as the public-facing version."

Update section 5.4: "Proba welcomes public scrutiny, and we consider transparency as a core value. As such, Proba publishes all documentation that is relevant to the GHG project lifecycle, such as the Project Overview Document, Methodologies and (baseline) calculations used, feedback on the Public Consultation, Monitoring Reports or Validation and Verification reports of the related assessments performed by 3rd -party independent VVBs. These are made available on the Proba Registry. Where supporting project documentation includes sensitive or confidential information, the Project Developer may decide to only make it available for relevant parties. A public-facing version must also be published on the Proba Registry. This version should explain what types of information have been withheld and why, while ensuring that full versions are shared with Proba and the VVB for verification and oversight purposes. This applies, for example, to Monitoring Reports, Additionality assessments, and other documents critical to the project lifecycle."

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

"Proba's Carbon Credits are issued as NFTs on the blockchain and follow the ERC-1155 standard in order to promote Credit and data exchange with third-party platforms."

The Proba platform uses unique identifiers to identify individual units. On the Proba registry, Proba Tradable Credit Bundle ID's can be found per bundle of retired credits.

Update 21/03/2025:
Proba has updated the way data is displayed on its registry. The registry now displays the details of each Proba credit bundle, including the individual Credit IDs for issued, retired, and cancelled credits. This update makes it clear which token IDs are included in each bundle and shows the full credit range covered. As an example you can check: https://registry.proba.earth/PROBA.2023.0001

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

On the first page of the registry all Proba projects that issue credits are listed. For every project, a new project page can be opened.

This project page shows a list of project details, a project yields table, retirement details and project documents.

On the registry, issued credits can be found in the table GHG Yield Information, Issued and Available Credits under Issued Credits. All realized yields are verified by a VVB and for these verified yields, credits have been issued.

In the retirement details table, retired credits are displayed. Retirement is done per bundle and all relevant information is displayed per retired credit bundle.

Proba has the option to put issuance of new credits on hold and has the option to cancel unclaimed issued credits in the platform. So far, the registry has no examples of canceled credits.

For the process of canceled credits, refer to section 5.10: Credit cancellation of the Proba Standard.

"Should the VVB or Project Developer identify a Reversal event during Monitoring activities (or via another channel) or a significant deviation of Yield compared to estimations, the VVB or Project Developer must immediately inform Proba. If the Reversal is confirmed, Proba will put the issuance of new Credits on hold. Only after the Project Developer has resolved the impact of the reversal via full Compensation of the lost Credits, will Proba resume the issuance of new Credits for this GHG Project.
In the event that within a GHG Project a given Yield loses its validity, Proba may, after extensive investigations and exploring the options for compensation, cancel the issued Entitlements or Credits, preventing them from being used or claimed. The extreme event of cancellation is a last resort option and always requires the approval of the Proba Management Board. When the Project Developer is not able to recover or compensate for the reversal, Proba will use Carbon Credits from the Buffer Pool to compensate for the loss. The situations below provide some examples (non-exhaustive):

- *Reversal of the Project impact, where previously achieved GHG improvements (reductions, removals) are re-emitted unexpectedly, and/or sooner than the planned Storage Duration of the GHG Project*
- *An intervention or used Methodology appears in hindsight not to deliver the expected CO2(e) Yield (e.g. erroneous methodology, new scientific insights). If the methodology is revoked or deprecated, it will become ineligible for any future Project. For running Projects using a revoked methodology, corrective actions will be taken.*
- *Alleged fraudulent or corrupt practices by Project Stakeholders involved (e.g. conscious data manipulation or inflation, irregular measurements, conscious omission of risks/leakage)"*

Update 21/03/2025:
Proba has updated the Proba registry. For every project on the registry there is now a table available that would display any canceled credits. So far, the registry has no examples of canceled credits. As an example you can check:
https://registry.proba.earth/PROBA.2023.0001

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.

Find the Proba KYC policy on the Proba document library. This policy applies to all users, organizations or entities participating in a Proba GHG project, and therefore are creating an account on the Proba platform. The Proba registry uses data and documents from GHG projects registered in the Proba platform.

Proba asks organizations and stakeholders to register on the Proba platform: https://app.proba.earth/register. Additionally, organizations are required to submit a completed and signed onboarding form. Any organization completing the

onboarding form is required to declare adherence to our Code of conduct. The main purpose of adhering to the Code of conduct is to mitigate the risk of conflicts of interest between project developers, VVBs, buyers and/or Proba.

The Proba KYC policy was introduced in June 2024. Stakeholders of GHG projects that were onboarded prior to that did not follow this procedure. (https://proba.earth/hubfs/Downloads/Proba_KYC_Policy.pdf)

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

Visit https://registry.proba.earth/. All information on the registry is available in English.
Visit https://proba.earth/document-library All Proba documents and templates are available in English.
Visit https://proba.earth/methodologies All Proba methodologies are available in English.

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.

Yes, Proba recognises this.

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

All projects are required to be validated by an independent VVB conform ISO 14064-3 with a reasonable level of assurance. See section "4.4 Validation Procedure", "4.5 Verification Procedure" and "4.7 Audit Requirements" in the Proba Standard.
A VVB is encouraged to use the Proba project verification template, which is available on our website in the document library or via this direct link:
https://proba.earth/hubfs/Downloads/Project_Verification_Report_template.pdf
The template asks the VVB to specify the level of assurance as defined in ISO 14064-3. The Proba Standard requires a reasonable level of assurance.

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.

The list can be found in the document library on our website:
https://proba.earth/hubfs/Downloads/Proba_approved_VVBs.pdf

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.

At this moment we have one VVB pending approval, which is awaiting formal accreditation from the national accreditation body. Other VVBs used for projects in the past were approved based on the exception for small scale projects (see section 4.6 in the Proba Standard). We will document this deviation from the 1.1 version of the Proba Standard during the next verification event. At this moment we are in the process of approving and onboarding a second and third VVB. We expect this to be completed in Q4 2024.

Update 21/03/2025:
As of now we have at least two organisations approved as 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.**

See section "4.8 VVB requirements" of the Proba Standard, under Qualifications. Verifiers and/or VVB companies who wish to audit interventions against the Proba Standard must prove accreditation according to ISO 14065:2020.

Each VVB is required to adhere to our Code of conduct for VVBs and complete the application form which can be found on our website in the document library https://proba.earth/document-library or following the direct link: https://proba.earth/hubfs/Downloads/Proba_VVB_Application_Form.pdf

As part of the onboarding process, the VVB is approved for specific sectoral scopes.

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.

See section 5 "Oversight of VVBs" of the Proba Standard Quality & Governance document
Proba takes responsibility for reviewing and approving the VVB and monitoring its performance and qualifications across Projects and Methodologies. Each VVB is reviewed by Proba every 3 years. In this review the VVB is requested to (re)deliver all relevant information for the continuation of the approval. Additionally feedback from project audits and methodology reviews is requested and evaluated.
Circumstances like bad publicity or negative evaluations of completed audits can result in an early evaluation of the VVB's performance and its approval.

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.

As described in the Proba Standard section 4.6

Proba reserves the right to grant exceptions for certain types of projects, such as pilots, or small-scale GHG Projects. Project Developers can ask Proba for a simplified Validation and Verification process.

These can be projects where the expected GHG yield is lower than 10,000 tCO2e per year per Project Developer (so-called "small-scale projects").

If, as part of the Eligibility Check, an exception is granted, Proba proposes a simplified Validation and Verification process. This usually consists of Validation and Verification by a knowledgeable, independent expert without the necessary accreditations of a VVB.

For the independent expert, the following conditions apply:

- *The independent expert needs to comply with the same integrity and independence requirements as described in section 4.8.*
- *To demonstrate their expertise, the independent expert should provide professional qualifications related to the context of the small-scale project. This includes at minimum:*
  - *Relevant scientific degree: A degree in a relevant scientific field (eg. environmental science, chemical engineering, agronomy);*
  - *Relevant professional experience: Documented practical experience in areas directly related to carbon accounting, project monitoring, Validation, and Verification. This can include memberships in relevant associations.*
- *The proof of expertise will replace the regular VVB approval procedure (section 4.9) and will be documented by Proba. The independent expert will not be listed on the Proba website as an approved VVB.*
- *The proof of expertise needs to be approved by the Proba Management Board before the independent expert can begin with the Validation and / or Verification procedure.*
- *The independent expert should follow the same Validation and Verification procedures and make use of the same templates as described in sections 4.4 and 4.5.*

The exception will be extensively documented, explained and published on the Proba Registry.

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.**
  As part of the onboarding, each VVB is required to accept and adhere to our Code of conduct for VVBs, which covers independence requirements.
  (https://proba.earth/hubfs/Downloads/Proba_code_of_conduct_VVBs.pdf)

Update 21/03/2025:
Proba has created a new version (1.2) of the Code of Conduct for VVBs since the previous application for endorsement. With these changes, a VVB that adheres to the Code of Conduct provides better proof of independence from Proba.

- **At least two individuals involved in validation and/or verification of each project (peer review)**
  This is required by the Proba Standard. See section "4.7 Audit requirements" and part of our validation and verification report templates. For each audit a minimum of two qualified employees from the VVB are involved ensuring high quality by peer reviewing the outcomes (one performing the audit, the other issuing the Verification report).
- **Minimum requirements for site visits are specified** by the *Proba Standard in section 4.5: "For initial audits or after significant extension of Project scope (e.g. locations), the VVB is expected to perform a site visit on a subset of project locations. The VVB visits a subset of project locations at every Verification event, with the exact number being determined by the methodology-specific guidelines for Validation and Verification and the VVBs own procedures and project risk assessment." In the project verification template this is further specified for VVB's. Proba asks VVB's to specify locations, date/time, and employees involved. (https://proba.earth/hubfs/Downloads/Project_Verification_Report_template.pdf)*

  Update 21/03/2025:

  Proba has added a new section on site visits to section 4.5 of The Proba Standard. There was some duplication, now it is described in one place and should be more clear.

- **A rule on what number of sequential verifications are allowed before the project must be verified by a new VVB.**
  We require rotation of VVB after 3 years of verifications (see section 4.5 "VVB rotation period" in the Proba Standard).

- **Procedure for spot checks on quality of validation/verification reports, and mitigation plan**
  See section "5 Oversight of VVBs of the Proba Standard Quality & Governance document "Validation and Verification reports delivered by VVBs, are checked on quality by a Proba employee during the Operational check in the Proba platform. This check is performed for each Validation or Verification event. At minimum, a Proba employee verifies if all sections from the Validation and Verification templates have been completed. Based on risk assessment or due to quality issues, additional assurance can be requested by Proba.

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

Signed VVB application form (1)
Validation and / or verification report signed by two individuals, which mentions site visits (2, 3)
Email conversations (5)
Rotation not possible yet due to short lifetime: 4
Process flow diagram for our system (5)
Operational check template (5)
https://proba.earth/hubfs/Downloads/Proba_Operational_Check.pdf

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.

- *We start with a walkthrough in an online session that introduces a VVB with the Proba application form, the Proba project validation and verification templates, and any additional methodology specific guidelines for validation and/ or verification (available online on our methodology pages). Proba has developed a standard presentation for the online walkthrough session.*
- *Onboarding includes the completion of the VVB application form and approving the VVB.*
- *For additional questions and explanations, ad hoc online meetings will be planned.*

Update 21/03/2025:
We have updated section 5 VVB Oversight in the new version of the Proba Standard Quality & Governance document. This section now (better) explains the VVB capacity building support.

"To ensure consistency and high-quality validations and verifications, Proba provides structured onboarding and training support to newly approved Validation and Verification Bodies (VVBs). This capacity-building effort includes:

- *Onboarding Session: A mandatory introductory session covering Proba's Standard, methodology validation and verification requirements, and reporting expectations.*
- *Guidance on Verification Templates: Detailed instructions on the use of Proba's verification templates and data submission procedures.*
- *Walkthrough Meetings: Regular meetings with newly onboarded VVBs to clarify methodology-specific requirements and expectations.*
- *Continuous Support and Training Materials: Ongoing assistance and periodic updates based on feedback from VVBs and audit results. Proba will provide access to additional training materials, best practices, and methodology clarifications to support consistent application of Proba's validation and verification processes.*

Proba ensures that all VVBs complete the onboarding process before conducting any validation or verification activities. Training materials and

resources will be reviewed periodically to reflect updates in methodologies and regulatory standards.

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.

VVB is required to adhere to the Code of Conduct, which is formalized during onboarding. Additionally we walk through the most important aspects of working with Proba and validation and verifying according to the Proba Standard during our online walkthrough session. See also question 4.3.3.

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.

The Project Developer must declare that the GHG Project is not (and has never been in the past) registered under another initiative or registry that issues Carbon Credits. Also, the Project Developer declares that the intervention is not (and has never been in the past) included in or is not part of the scope of a national reduction plan, such as the UNFCC NDC plans. Contractual agreements need to be in place to prevent a GHG project and related interventions from contributing to Double Counting or Double Issuance of Carbon Credits.
(See Proba Standard, section 3.4 on Project Design)

The Credits are issued post-Verification and have a unique ID number. They are issued on a blockchain and are as such immutable and cannot be reproduced.
(See Proba Standard, section 5.7 on Uniqueness of the Carbon Credit)

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.

Proba only issues ex-post Credits. The pre-purchasing of future Carbon Credits is possible in the form of Pre-Credits, but Pre-Credits do not qualify as Carbon Credits and cannot be used for claiming GHG benefits.

Ex-ante and ex-post Credits
Proba does not issue ex-ante Certificates and only issues ex-post Credits, where the GHG Yield of the GHG Project has been achieved and independently verified. As such, the Proba Credit always refers to a real climate impact.
Pre-financing and pre-allocation of Credits
Proba is open to project pre-financing for getting the GHG Project off the ground. When there is financing or a pre-payment by a Project Sponsor on a yet-to-be-realized GHG Yield, the future Carbon Credits can be reserved in the Proba Platform. This reserved and future Credit is called a Pre-Credit. The

Pre-Credits can be issued to the Project Sponsor directly after validation of the GHG Project. This Credit type does not allow to claim the GHG benefits until the Yield is actually realized and verified, at which point the Pre-Credit becomes a Carbon Credit. The Pre-Credit can be transferred immediately after it has been issued.
(See Proba Standard, section 5.8 on Realness of Emission Reductions and Carbon Removals)

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.

We identify the following project types based on methodologies developed by Proba:

1) *Projects using our "short rotation Paulownia tree cultivation" methodology face a risk of reversal.*
2) *Projects using our "low carbon fertilizer production" methodology (in progress) face no or a minimal risk of reversal.*

The Project Developer commits to continue all Monitoring activities:

- *Until the end of the project period as described in the Project Overview Document (POD).*
- *After the project period/end of the last Crediting Period, and at least for the agreed Storage Duration period. This is to mitigate the reversal risk and ensures that the GHG Yields as mentioned in the Proba Credits are maintained for the agreed Storage Duration as described in the POD.*

(See Proba Standard, section 4.2 on Post-project Monitoring)

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.

The Project Developer is required to create a Proba "Project Overview Document", or POD, based on the POD template provided by Proba. This document contains extensive information about the project's intervention(s), including governance, baseline calculations, risks (and risk mitigation), methodologies, MRV processes, etc.

Essential components in the POD are to show how the following critical risks are mitigated:

- *Risk of Unrealistic Representation; Baseline, at least 1tCO2 of real CO2e*
- *Risk of Unfair Additionality*
- *Risk of False Climate Benefits Appropriation (volume, timing, durability);*
- *Permanence*
- *Risk of Double Spending / Claiming*
- *Risk of reversal / No reversal statement; buffers*
- *Risk of leakage*
- *Risk of Collateral Environmental Harm*
- *Risk of Collateral Social Harm*

(See Proba Standard, section 2.2 on Project Design)
(See also POD template: https://proba.earth/hubfs/Downloads/Proba_POD_Template.pdf)

Additionally, methodologies developed by Proba (can) have specific guidelines for validating the risk of reversal of a project. This link provides an example for our "short rotation Paulownia tree cultivation" methodology.

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.
In the event of premature or unexpected reversal, the Project Developer is required to allocate available or future Carbon Credits for replacement of the reversed Credits or take reasonable effort to recover from the reversal. When the Project Developer is not able to Compensate for the carbon loss, Proba will allocate Carbon Credits from the Buffer Pool to replace the reversed Carbon Credits.
(See Proba Standard, section 3.8 on Permanence of the GHG Yield)

For each GHG Project, the standard contribution to the Buffer Pool is set to 10%. Proba will assess the various risks (environmental, regulatory, project implementation) that may lead to premature reversal or lack of Permanence of each project. The outcome of the assessment can be used to increase or decrease this contribution. The methodology should give clear guidelines on this.
(See Proba Standard, section 3.9 on Quantify GHG Yield)

5.3.4 Provide evidence that the requirements and mechanisms described in Sections 5.3.1-5.3.3 are in place and followed.
Review sections 11 and 15 in the POD template (link: https://proba.earth/hubfs/Downloads/Proba_POD_Template.pdf)
In order to review these procedures in practice, review our registry where POD's from actual GHG projects are published https://registry.proba.earth/
(Note: two projects have been started before the initial version of the Proba Standard was approved)

5.4 Additional

5.4.1 Describe how the Programme ensures projects are additional based on:

- **Legal or regulatory additionality analysis, and**
- **At least one of the following:**
  - **Investment, cost, or other financial analysis *(most preferred)*, with a common practice/market penetration analysis**
  - **Barrier analysis *(least preferred)*, with a common practice/market penetration analysis**
  - **Performance standards/benchmarks**

Updated answer per 09/07/2025

(See Proba Standard, the revised section 3.6 on Additionality Requirements)

"Proba recognizes multiple dimensions of Additionality, all of which must be demonstrated for a GHG Project to qualify under the Proba Standard. A project is considered additional if the GHG reductions or removals would not have occurred without the enabling role of carbon finance. In other words, both the GHG Project and the expected GHG Yield must not represent business-as-usual outcomes.

To meet this standard, all projects must demonstrate compliance with the following three Additionality dimensions:

- *Regulatory Additionality*
- *Financial Additionality*
- *Prevalence*

The assessment of each dimension must compare the expected outcomes of the intervention with the Business-as-Usual (BaU) scenario, or "Baseline" (see Section 3.7). The Project Developer is expected to define the Baseline before implementation of the intervention.

To ensure consistency, transparency, and completeness in how Additionality is assessed and documented, all Project Developers are required to use the Proba Additionality Assessment Template.

The completed Additionality Assessment must be included as an appendix or addendum to the Project Outline Document (POD) on the Proba Registry. A public-facing version of the assessment must always be published for transparency. If the assessment contains sensitive or confidential information, a separate public-facing version must be prepared in accordance with Section 5.4 of the Proba Standard. In such cases, supporting evidence may be withheld, but the core reasoning and key claims must remain accessible. Where applicable, project methodologies may contain additional requirements or tests for assessing additionality. These must be addressed within the Additionality Assessment using the designated section(s) of the template.

Regulatory Additionality

The Project Developer must demonstrate that the project is not mandated by existing or forthcoming legal, regulatory, or policy requirements. This includes:

- *Confirmation that no law, statute, or regulation requires the intervention during the crediting period.*
- *If the project is required by regulation but goes beyond the minimum requirements, describe how the intervention exceeds the legal baseline.*
- *Assessment of sector-specific agreements or national targets that might indirectly require the intervention.*
- *Analysis of sectoral trends to demonstrate that emissions are not already decreasing significantly due to existing or emerging practices*
- *Consideration of voluntary, pre-competitive sector initiatives. The Project Developer must show how the intervention exceeds these initiatives' ambitions or timelines.*

Financial Additionality

The Project Developer must demonstrate that the project would not be financially viable without revenue from carbon credits, or that the revenue enables meaningful scaling, acceleration, or risk reduction.

Two approaches are accepted:

- *Use of the CDM Tool for the Demonstration and Assessment of Investment Additionality (v7.0.0), which provides a structured investment analysis.*
- *Completion of a cost-based analysis using the Proba Additionality Template, including:*
    - *Estimates of implementation and operational costs versus financial benefits.*
    - *Justification of financing constraints (e.g., high capital expenditure, long ROI).*
    - *Transparency about any subsidies, tax advantages, or public incentives.*

Prevalence

The intervention or technology must not represent common practice in the relevant region or sector.

Proba follows the CDM guidelines on common practice, using a threshold of 25% adoption to define whether a practice is considered common.

The Project Developer must show that the adoption rate is below this threshold through one or more of the following:

- *Adoption data from reliable sources.*
- *Performance benchmarking showing that the project significantly exceeds average practice.*
- *Expert assessments or literature demonstrating sectoral or geographic differentiation.*

In addition, the Project Developer may include a barrier analysis to highlight technical, institutional, or cultural challenges that limit broader adoption. This analysis is optional but can strengthen the demonstration of non-prevalence.

Multi-Intervention Projects

If a project includes multiple interventions or methodologies, the Additionality Assessment must address each intervention individually or in a consolidated manner, while preserving traceability and compliance with all relevant methodological rules.

Methodology-Specific Additionality Tests

If the methodology includes specific additionality tests beyond the three standard dimensions, these must be documented clearly in the designated section of the template and supported with appropriate evidence.

(Also see section 4 of the Proba POD template: https://proba.earth/hubfs/Downloads/Proba_POD_Template.pdf)

"The Project Developer is required to use the Proba Additionality Assessment Template, or alternatively, the CDM additionality template, to demonstrate that the project results in GHG emissions reductions or removal enhancements that are additional to what would have occurred in the absence of the intervention, compared to the business-as-usual scenario.
This structured template guides users through each of the three required additionality dimensions (Regulatory, Financial, and Prevalence), and includes space to incorporate methodology-specific criteria and reference supporting evidence.
The completed additionality assessment must always be submitted to the Proba platform or registry. If the assessment contains sensitive or confidential information, a public-facing version must also be prepared and submitted in accordance with Section 5.4 of the Proba Standard.
Please include a reference to the completed additionality assessment below and summarize its main conclusions."

5.4.1.1 **Provide evidence that the Programme defines and provides guidance for each additionality assessment method it permits. This should include the instructions the Programme gives to project developers on how to apply each method, along with examples of acceptable evidence (as provided by the Programme).**

Please refer to the Proba Additionality Assessment Template: https://proba.earth/hubfs/Project_Design/Proba_Additionality_Assessment_Template.pdf
Note: The Proba Additionality Assessment template will be applied to future GHG Projects seeking Proba certification.

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.
Proba does not hold a "positive list" to automatically define GHG projects as additional.

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.
Proba requires that the Project Developer sets up the Project and all relevant documentation according to the criteria as determined by ISO 14064-2: 2019: "Greenhouse gasses — Part 2: Specification with guidance at the project

level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements".
(See Proba Standard, section 3.4 on Project Design)
Each Project Overview Document is (after an eligibility check) published on the public registry and each project is subject to a public consultation. After that an independent VVB validates that the project design complies with the standard and selected methodology.

Our current methodologies are project based.

LCA-Based Projects
For some project types (e.g. industrial processing, recycling/circularity/waste management, or material switch) Proba may require the Project Developer to use a Life Cycle Assessment (LCA) based methodology to estimate the GHG Yield of the project intervention(s). Such LCAs must include a cradle-to-grave or cradle-to-gate approach using a Methodology approved by Proba.
(See Proba Standard, section 3.12 on LCA-based projects)

Approved Methodologies can be found at: https://proba.earth/methodologies

Update 21/03/2025:
Section 3.12 on LCA projects within the Proba Standard has been updated and clarified. See below:
"All methodologies under the Proba Standard are project-based. Proba does not certify products but rather certifies emission reductions and removals achieved through GHG projects. While Life Cycle Assessments (LCAs) are used as tools within project-based methodologies, they serve to quantify emission reductions in both the baseline scenario and the project scenario. For example, in projects where a farmer switches from a conventional fertilizer to a lower-carbon alternative, LCAs may be used to measure the emission reductions associated with that transition. LCAs must be applied within a project-based framework and cannot serve as standalone methodologies under the Proba Standard. Approved methodologies incorporating LCAs can be found on the Proba website."

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.**

In the Proba Standard section 3.7, the procedure for baseline determination is fully explained. The methodology further specifies how the baseline should be established.
The Project Developer is expected to include this in the Project Overview Document, following the procedure as described in section 6 of the Project Overview Document template and the relevant methodology.

The Project Developer shall select or establish criteria and procedures for determining the GHG Baseline considering the project description, including identified GHG SSRs and whether they are in the scope of the project or not.
The Project Developer 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 Developer shall select or establish, describe, and apply criteria and procedures for identifying and justifying the GHG Baseline.

- **All projects to identify and mitigate leakage of emissions.**

This is described in section 3.9 of the Proba Standard.
Mitigating leakage involves a combination of planning, monitoring, community engagement, and adaptive strategies. The Project Developer can include the following actions:

- *Clearly define project boundaries to account for potential leakage areas*
- *Regularly monitor areas adjacent to the project for unintended emissions increases*
- *Establish buffer zones around the project to absorb potential leakage*
- *Collaborate with local communities to address concerns and prevent activities causing leakage*
- *Offer alternatives to activities that might cause leakage, such as sustainable farming practices*
- *Ensure project activities align with local regulations to prevent legal loopholes*
- *Adjust project strategies based on monitoring data to address emerging leakage sources*

*In the Project Overview Document template, a Project Developer is expected to address leakage in section 13 Project Risks and Mitigation Measures. The methodology may provide further specification of what leakage sources should be include*d.

- **Projects to use conservative estimates if real project data is not available.**

This is described in section 3.9 of the Proba Standard
All Methodologies chosen by the Project Developer must follow the Conservativeness principle. This principle ensures that the expected GHG Yields are not over-estimated. To do so, the Project Developer prioritizes conservative estimates and Methodologies, carefully chooses the location or time frame for setting the Baseline, or leaves uncertain or not measurable carbon SSRs out of the Project Boundaries.
In the Project Overview Document template section 5, the Project Developer should list the methodology(ies) used by the project and describe the rationale for this choice. The Project Developer is asked to describe how they have adhered to the conservativeness principle in making their decisions.

- **All projects to re-calculate baselines, at minimum, upon each crediting period renewal.**

This is described in section 3.7 of the Proba Standard
Methodologies may prescribe the use of a dynamic baseline in case markets are evolving rapidly and have a severe impact on baseline calculations (e.g. phased regulatory changes).
GHG Baselines are not static and may need to be updated periodically. Review and update the Baseline at regular intervals or when significant changes occur that affect the project's emissions, or ahead of the renewal of the Crediting Period.

5.5.3 Provide evidence that all methodologies under the Programme have monitoring requirements that are validated and verified for each project.
A monitoring plan should be part of the Project Overview Document (section 15 of the POD Template).
We encourage VVB's to use our general Project validation and verification templates. The monitoring plan should be part of the validation and verification scope.
https://proba.earth/hubfs/Downloads/Project_Validation_Report_template.pdf
https://proba.earth/hubfs/Downloads/Project_Verification_Report_template.pdf
Next to the general templates, Proba will prepare methodology specific guidelines for project validation and verification. Evidence for this can be found on each specific methodology page. Example: methodology specific guidelines for short rotation Paulownia tree cultivation

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.
In each methodology a list of references can be found that shows the used (and cited) peer-reviewed journals and scientific publications that support our methodologies.

This includes utilizing data and guidelines from internationally recognized bodies such as the Intergovernmental Panel on Climate Change (IPCC), the Clean Development Mechanism (CDM), the Food and Agriculture Organization (FAO), and the Greenhouse Gas (GHG) Protocol, as well as relevant literature from accredited scientific sources (sciencedirect, springer, nature, etc.) to develop our methodologies

Every methodology provides evidence that the emission factors and equations are based on such publications.

For example, please review the short rotation Paulownia tree cultivation methodology where the latest available scientific publications have been used.
https://proba.earth/paulownia_methodology

On this page feedback from public consultation can also be found under Additional Documents. Public consultation is required for each methodology following section 5.1 in the Methodology development and approval process.

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.

This topic, and related requirements, is extensively described in the Proba Standard and in the Project Overview Document.

The Proba standard specifies the following parts:

- *Social harm - Section 3.2 Project legal compliance. Proba only works with project developers that demonstrate compliance with ILO standards or local regulations.*
- *Section 3.11 Environmental and Social Do No Harm Safeguards describes the requirements related to No Net Harm.*

The POD template requires this in Sections 11 and 12.

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.

Section 3.11 of the Proba Standard provides 10 clear requirements for project developers, such as conducting a Risk Assessment on Social and Environmental aspects, Local stakeholders consultation, FPIC, transparency etc.

The POD document submitted for Validation also include these elements in the following sections:

Section 11: Local Stakeholder Consultation

Section 12: Environmental and Social Do not Harm Principle, requires the following:

1. *Identify Potential Impacts: List all anticipated environmental and social impacts of the project, both positive and negative.*
2. *Where required by local regulations, perform an Environmental Impact Assessment (EIA) and submit it to Proba as an annex to this POD.*
3. *Social and Environmental Mitigation Measures: Describe specific measures you will implement to mitigate negative impacts.*
4. *Monitoring Plan: Outline a plan for ongoing monitoring of environmental and social impacts throughout the project lifecycle. IT can be included in the broader GHG Monitoring Plan (see section 14).*
5. *Compliance: Confirm adherence to relevant local, national, and international environmental and social standards and regulations.*
6. *Documentation: Provide evidence of due diligence in the assessment and planning process, such as impact assessment reports or records of stakeholder consultations.*
7. *Grievance Mechanism: Detail the procedure for addressing grievances related to environmental and social issues.*
8. *Continuous Improvement: Commit to regular reviews and updates of the environmental and social impact strategy to reflect new information or changing conditions.*

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

The rules and requirements mentioned in section 6.1 and 6.2 are followed in the POD of onboarded projects. These can be found on the Proba Registry:

- *Paulownia Tree plantations Sisak - Petrinja, Croatia (validated and verified)*

- *Note: the Cashew Captures Carbon Benin project has been onboarded prior to the publication of our Standard. It does however include a local Stakeholder Consultation and a Risk assessment and mitigation plan*
- *Dealin.Green Paulownia in the Netherlands (pending validation)*

7. Stakeholder Considerations

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

- **a definition of "stakeholder"**

Proba defines the "stakeholder" in 2 ways:

- *the "project stakeholder" is a person or entity that is involved directly in the project. They can be partners, service providers, or supply chain actors.*
- *the "local stakeholder", on the other hand, is impacted by the project or acts as an enabler, directly or indirectly. They can be local communities, indigenous people, local institutions, or CSOs (NGOs or sector organizations).*
- **a requirement for 30-day public consultation for new programme documents (or during revisions to programme documents)**

As described in section 2 of the Proba Standard Quality & Governance document. The Proba Standard undergoes 2 review cycles:

1. *The minor review cycle. This cycle occurs at least once a year and focuses on minor or incremental improvements.*
    a. *The Proba Technical Committee maintains a list of changes, suggestions, or feedback received from partners, staff, the advisory board, VVBs, or any other stakeholder using the Proba Standard. This list of changes is regularly shared with and accessible by the Proba Standard Advisory Board.*
    b. *Proba also performs a scan on regulatory changes and important publications that may have a (larger) impact on the Proba Standard.*
    c. *This cycle does not involve public consultation, provided that the changes are minor or incremental.*
    d. *Updates to guidance documents, templates and other supporting documents may be performed during this cycle, providing it does not include more fundamental changes that would require public consultation.*
    e. *The PTC submits the updated version for approval to the Proba Standard Advisory Board.*
    f. *Once approved, the new version of the Proba Standard is published and shared with the Proba stakeholders.*
2. *The major review cycle. This cycle occurs at least every 3 years and focuses on large changes.*
    a. *This review cycle is subject to a public consultation round.*
    b. *This review cycle is meant to include and reflect the latest trends and developments in the Voluntary Carbon Market.*
    c. *It may include larger or more impactful changes, structural changes, new best practices, and internal learnings.*
    d. *Updates to guidance documents, templates and other supporting documents may be performed during this cycle.*

e. *The PTC submits the updated version for approval to the Proba Standard Advisory Board*
f. *Once approved, the new version of the Proba Standard is published and shared with the Proba stakeholders.*
g. *Alongside the reviewed Proba Standard and for transparency reasons, Proba publishes a public explanatory note containing the feedback received, and how it was handled and used for the review.*

As section 2.3 of the Proba Standard explains, every GHG project will go through a 30-day Public Consultation period.
After the Proba Management Board has validated the Project Overview Document and confirms that the GHG Project is eligible for Certification by the Proba Standard, the Public Consultation period will start.

- *The GHG Project will now be open for Public Consultation. As such, anyone who wishes to provide comments on the POD document is welcome to do so. The Public Consultation period will last for 30 days.*

- **a requirement for 30-day public consultation during methodology development**

As described in section 5 of the Proba methodology approval and development process, Proba will publish a draft methodology for public consultation. Proba will publish the methodology on the public consultation page for public comment (see https://proba.earth/public-consultation) for a period of 30 days. Proba can decide to extend this period for methodologies of higher complexity.

- **project consultation documents available in relevant local language(s), as necessary for effective consultation with local stakeholders**

As described in the Proba Standard section 2.3, The POD will always be written in English language, but in case effective consultation with local stakeholders is needed, a relevant language may be used next to the English version.

- **a process by which results of stakeholder engagement is included in documents that undergo validation and verification**

Proba Standard stakeholder engagement:
As described in the Proba Standard Quality & Governance document in section 2, changes and feedback received are evaluated by the PTC and submitted for approval to the Proba Advisory Board
Alongside the reviewed Standard and for transparency reasons, Proba publishes a public explanatory note about the feedback received, and how it was handled and used for the review
GHG Project stakeholder engagement:
As described in the Proba Standard section 2.3, the Project Developer evaluates all feedback received, and documents the justification to include or exclude the feedback received in the POD. Proba will be informed of any changes in the revised POD.
The new POD is published by Proba, alongside a document summarizing the feedback received and how they have been used. The Project Developer submits the Project for Validation by an independent VVB.
The Proba platform enforces that these steps are taken by the Project Developer.
Methodologies stakeholder engagement:

As described in the methodology development and approval process, the Proba Technical Committee will process feedback received and send a final version for an expert review by a Validation and Verification Body (VVB).

- **a defined process on how local consultations must be conducted**

In every GHG Project the Project Developer is required to take Local Stakeholder Consultation into account, and provide a summary of the process and of the feedback, concerns, and suggestions received, and how they have been addressed in the Project Design. The Project Overview Document template section 5 illustrates the process:
Local stakeholder consultation in GHG projects involves engaging with individuals and groups affected by or interested in the project. This process includes:

1. *Identifying stakeholders, such as local communities, governments, and NGOs.*
2. *Informing them about the project's goals, methods, and potential impacts.*
3. *Gathering their feedback, concerns, and suggestions.*
4. *Incorporating this input into project planning and decision-making.*
5. *Ensuring ongoing communication and engagement throughout the project lifecycle.*

7.2 Describe how stakeholder comments are transparently addressed.

Alongside the reviewed Standard and for transparency reasons, Proba publishes a public explanatory note about the feedback received, and how it was handled and used for the review
For GHG projects a document summarizing the feedback received and how they have been used, will be published.
And for methodologies this is again described in the Methodology development and approval process section 5.1. After all feedback has been processed and the methodology has been approved, the new methodology will be published on the website in the methodologies section under "Approved methodologies" including the feedback and response documents from public consultation and expert review (see: https://proba.earth/methodologies).

7.3 Provide evidence that the procedure in Section 7.1 is being followed

Evidence for Proba Standard: see https://proba.earth/public-consultation and more specifically section "Closed public consultations"
Evidence for GHG Projects: see Dealin Green project on https://proba.earth/public-consultation and more specifically section "Closed public consultations"
Evidence for methodologies: Our specific methodology page that was created for our Paulownia methodology provides evidence of feedback documents from public consultation and expert review. Find this page here: https://proba.earth/paulownia_methodology

Update 21/03/2025:
The public consultation webpage has been updated for closed public consultations of projects. All three existing projects now link to the Proba Registry where the feedback documents are published. Note: For the two first projects, no Feedback & Response document is available as these projects were validated before the launch of the 1.0 version of the Proba Standard. This is also documented on the registry.

8. Scale

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

On the Proba Registry the current projects that have issued Proba credits can be found. The first two projects were started before the initial version of the Proba Standard was published and fall under the category of "small-scale projects" for a simplified Validation and Verification process (section 4.6 of the Proba Standard).
https://registry.proba.earth/

8.2 Confirm whether the Programme has registered 10+ projects and issued 100,000+ t CO2e in carbon credits.

On the time of application Proba has registered three active projects, and has not issued 100,000+ t CO2e in carbon credits yet.

9. Additional Considerations

Please disclose any open litigation involving your organization. For each case, provide a detailed explanation, including the nature of the litigation, the parties involved, and the current status.

We confirm that Proba is not involved in any open litigation cases.