

PROGRAM NAME: Puro Standard
ORGANIZATION: Puro.earth
ASSESSMENT TYPE: Non-CORSIA Program Level Assessment
DATE OF SUBMISSION: March 28, 2024
DOWNLOADED ON: May 22, 2024
STATUS: In Review

Background

Methodologies for Exclusion

Please list any methodologies (name and URL) that your programme would like to have excluded from Category-level assessment by the ICVCM team.

If none, please enter "None" or N/A.

None

Must Read

Please acknowledge that you have reviewed the details provided in the "Background" section.
We have reviewed the Assessment Framework background materials.

Yes

A – Governance

1.1 Effective Governance - CORSIA

CORSIA requirements related to governance framework:

1) Programme Senior Staff / Leadership (e.g., President / CEO, board members) *List the names and titles of programme's senior staff and leadership, including board members.

Puro.earth Leadership Team

Antti Vihavainen, Chief Executive Officer Marianne Tikkanen, Head of Standard Benno Fuchs, Chief Operating Officer Trenton Spindler, Chief Growth Officer Helen Bray, Vice President Policy

Alvin Lee, Head of Asia-Pacific (APAC)

Joseph Kochanski, Head of Operations, Americas

Joona Kunnas, Regional Head, Europe, Middle East, and Africa (EMEA)

The Puro.earth Leadership Team is listed here: [About us - Puro.earth](#)

Board of Directors

Fredrik Ekström (President of Nasdaq Stockholm), Chairman of the Board of Puro.earth

Eve Tamme (Founder and Managing Director - Climate Principles), Independent Board Member Jan Willem Bode (Independent consultant), Independent Board Member

Roland Chai (President of European Markets, EVP, Nasdaq) Linda Olsson (Market Services CFO, Nasdaq)

Randall Zuccalmaglio (Senior Associate, Nasdaq Ventures)

Mats Persson (Senior Vice President, Portfolio Management and Markets, Fortum) The Board

of Directors is listed here: <https://puro.earth/board/>

Independent Advisory Board

The Advisory Board's mandate is to ensure high credit-level integrity and robust principles for science- based high-quality carbon removal verification.

Chairman: Professor Myles Allen, Professor of Geosystem Science, Department of Physics, University of Oxford

Secretary: Mr. Grant McKelvey, Office of General Counsel, Nasdaq Ms. Nikki Batchelor, Director, XPRIZE Carbon Removal

Dr. Mai Bui, Senior Research Associate Centre for Environmental Policy, Imperial College Mr. Todd Flach, Managing Director, Net Zero Plastic AS.

Dr. Florian Kraxner, Research Group Leader and Principal Research Scholar, International Institute for Applied Systems Analysis (IIASA).

Professor Ali Mashayek, Associate professor of climate dynamics at the Department of Earth Sciences, University of Cambridge

Members of the Advisory Board are listed here: <https://puro.earth/governance/>

Weblink to the [Advisory Board Terms of Reference](#)

Leadership URL:

<https://carbon.puro.earth/about?p=meet-the-leadership-team>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The weblink takes you to the Leadership Team page. It is possible to navigate from that page to the Board of Directors and the Puro Advisory Board.

2) Provide an organizational chart that illustrates or otherwise describes the functional relationship a) among the individuals listed in 1; b) among those individuals and programme staff / employees; and c) the functions of each organizational unit and interlinkages with other units.

Organizational Chart URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Group%2013628.jpg>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The link takes you to the organizational chart.

3) Provide a summary description of your programme (300 – 500 words)

The Puro Standard is a durable carbon removal standard in the voluntary carbon market. It consists of high- quality carbon removal methodologies, aligned with the IPCC definition for carbon removal, for products or processes that remove carbon from the atmosphere.

The cycle is as follows:

- Our carbon removal suppliers develop carbon net-negative processes or products.
- Puro.earth certifies suppliers based on the Puro Standard
- Removals are independently verified by a third party and CO2 Removal Certificates (CORCs) are issued through the Puro Registry.
- Climate conscious companies buy CORCs directly from suppliers or through a third-party marketplace of their choice.
- Buyers retire CORCs in the Puro Registry to support their sustainability or net zero claims, ensuring transparency and avoiding double claims.

The Puro Standard was modelled on the rigorous standards required by renewable energy markets and adhered to high standards of integrity for Monitoring, Reporting and Verification that can be delivered through industrial durable carbon removal.

The Puro Standard and crediting rules are managed by an independent Advisory Board. The Advisory Board governs all changes to Puro Standard as defined in their Terms of Reference. It currently consists of six members with expertise in carbon markets. According to the Terms of Reference, the Advisory Board shall always consist of at least three and a maximum of seven members with a mix of skills and experience.

Please scroll down to, "How our carbon removal platform works".

Programme Summary URL:

<https://puro.earth/>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The Puro Standard is a durable carbon removal standard operating in the voluntary carbon

market and aiming to serve the compliance carbon market through CORSIA. It consists of high-quality carbon removal methodologies, aligned with the IPCC definition for carbon removal, for products or processes that remove carbon from the atmosphere to a durable and secure storage for long term.

Puro Standard and Registry is a global program to certify engineered carbon removals. We started operations in 2019. Nasdaq became the main investor in June 2021 to enable the scale up of the program. By January 2024, the program has issued over 500,000 units known as CO2 Removal Certificates (CORCs) to suppliers that have stored carbon durably. Puro certification requirements focus on robust carbon accounting, permanence of stored carbon and safety for people and the environment. We certify carbon removals, which deliver the “net” in net-zero emissions, the global goal of the Paris Agreement (Article 4 [parisagreement_publication.pdf \(unfccc.int\)](#)).

The certified projects are in 5 continents and across several durable carbon removal pathways, such as biochar, mineralization, enhanced weathering, and geological storage. [Puro.earth - carbon removal standard and registry](#). The Puro Registry has currently over 100 CO2 removal projects registered and almost 800 projects in the pipeline in varying degrees of maturity. [Listings \(puro.earth\)](#) Puro Registry ([Puro.earth | Registry](#)) tracks units (CO2 Removal Certificates (CORC)) from issuance to retirement. We were the first registry to offer full transparency to retirements (the use claims) of units. We also offer a downloadable history of all retirements, which has been welcomed by press and analysts.

The Puro Standard document library holds the Methodologies and General Rules of the crediting program [Document library | Website \(carbon.puro.earth\)](#). The methodologies are developed by the program together with stakeholders. The guiding principles of establishing new methodologies are scientific quantification, secure long-term storage, and robust environmental and social safeguards. Once established by the working groups, the methodologies undergo public consultation and a final approval by an independent scientific Advisory Board chaired by Professor Myles Allen from the Oxford University [About us - Puro.earth](#) .

In the General Rules v.4.0 the following clauses support the description of the program: Clause 1.1.2:

The Puro Standard and the Registry are a program for the issuing, transferring, and retiring of CO2 Removal Certificates (CORCs). In the System, Production Facilities capable of removing CO2 are independently audited and certified. CORCs are issued for verified volume of Long-Term Net Carbon Dioxide Removal realized over a time in these Production Facilities. These CORCs are then transferable to other Account Holders. The value of the CORC is realized by Retirement, thereby removing it from circulation and making the Beneficiary of the Retirement the sole owner of the CO2 Removal Attributes.

4) Confirm that your programme publicly discloses who is responsible for the administration of the programme

Yes

Administrative oversight provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, you may find references in:

1.3 Governance of the Puro Standard

1.3.1 The rules of the Puro Standard are governed by the Advisory Board. All changes to these rules are subject to the Advisory Board's approval.

Definitions

Issuing Body - The Body responsible for Issuing CORCs, for operating the System and for overseeing the reliability of the System. The Issuing Body of the System is Puro.earth Oy.

Puro.earth Oy is a limited liability company incorporated under the laws of Finland.

5) Confirm that your programme publicly discloses how decisions are made

Yes

Decision making process/policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In General Rules v.4.0, section 1.3 Governance of the Puro Standard"

1.3.1 "These rules are governed by the Advisory Board. All changes to these rules are subject to the Advisory Board's approval."

1.3.2 The Advisory Board may request revision to the Puro Standard and Methodologies as necessary. A review is requested when either an Advisory Board Member or Puro.earth management deems that significant changes have occurred in regulations, technologies, carbon accounting, or other provisions.

1.3.3 Should the review result in material revisions and/or new Methodologies, they shall be sent to public consultation before approval. Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter. Stakeholder comments are considered, and consultation results are published on the same website.

In addition, we publish the results of the Public Consultations with a summary of the comments received in the [Document library - Public Consultation \(puro.earth\)](#)

6) Confirm that your programme can demonstrate that it has been continuously governed for at least the last two years

Yes

Governance tenure URL:

<https://carbon.puro.earth/about?p=puro-advisory-board>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The Advisory Board was established as an independent entity to host and manage the Puro Standard in October 2021.

7) Confirm that your programme can demonstrate that it has been continuously operational for at least the last two years

Yes

Operational tenure URL:

<https://carbon.puro.earth/about?p=puro-advisory-board>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The Puro.earth program started operations in 2019 and has been continuously operational and governed since then. Detailed information to Questions A and B can be answered by the Puro timeline provided in this weblink: [About us - Puro.earth](#), scrolling down until reaching “History of Puro.earth”.

Evidence of operations can be found in the Finnish Trade Registry provided in the Legal Notice section of our website <https://puro.earth/legal-notice/>

The direct link to the Finnish Trade Registry is <https://tietopalvelu.ytj.fi/yritys/3114416-2>

8) Confirm that your programme can demonstrate that it has a plan for the long-term administration of multi-decadal programme elements

Yes

Long-term administration provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The monitoring obligations of CO2 Removal Suppliers to report potential reversals of issued CORCs extends for multi-decadal timeframes, as can be seen in the following General Rules clause:

“6.7.4 Where material risks are identified, the Methodologies in the Puro Standard shall include obligations on CO2 Removal Suppliers for risk identification, preemptive risk mitigation, management, and reporting practices. The CO2 Removal Supplier shall by undertaking the obligations ensure that the issued CORCs remain firmly and durably stored for the long term.”

The General Rules v4.0, clause 1.5.2.3 The Methodology shall address the following components: (x). Monitoring practices, roles, and responsibilities.

For example, for Carbonated Materials and Enhanced Rock Weathering methods, the IPCC has concluded that, “*The fraction of CO2 stored through mineral carbonation that is retained after 1000 years is virtually certain to be 100%. As a consequence, the need for monitoring the disposal sites will be limited in the case of mineral carbonation*”, and the CO2 removal supplier must provide a risk assessment and mitigation plan for the risks related to the permanence of the CO2 sequestration and potential re-emission of CO2.

Carbonated Materials, clause 6.4.3:

“The CO2 Removal Supplier must provide a long-term storage plan for any carbonated material intended for permanent storage. The long-term storage plan must specify the measures in place to ensure the permanence of the carbonated material during storage, taking into account the identified risks (see rule 6.4.2). Furthermore, the long-term storage plan must also specify how the permanence of the carbonated material is ensured in cases where:

- The CO2 Removal Supplier ceases to exist as a legal entity.
- The ownership of the storage site and/or the stored carbonated material is transferred to a third party.
- The storage site is destroyed or decommissioned (e.g. as a part of mine remediation or similar)."

Weblink to Carbonated Materials Methodology: [Puro.earth Carbonated Materials Methodology.pdf \(hubspotusercontent-na1.net\)](#)

In the Terrestrial Storage of Biomass methodology, the CO2 Removal Supplier needs provide a monitoring plan for early detection of a reversal and to demonstrate the ownership of land title for 100 years and a fund to cover financial requirements.

Terrestrial Storage of Biomass, clause 7.1:

"Overview of risks and management options

Re-emission risks refers to the loss of carbon storage due to either human activities (e.g. deliberate destruction of carbon storage) or natural events (e.g. fires, storms, earthquakes). Re-emission risks do not include the expected re-emissions that are already accounted for in the calculation of CORCs for certain storage conditions. These risks must be assessed and mitigation measures must be deployed. It is important to note that the relevance of certain risks varies with the type of biomass storage, and that mitigation measures must be implemented over the full liability period of the project, namely 100 years."

Weblink: [Terrestrial Storage of Biomass.pdf \(hubspotusercontent-na1.net\)](#)

For Biochar, there is a pre-issuance deduction based on degradation curves as a function of biochar quality, soil temperature and expected reversal after a time period of 100 years has lapsed.

Biochar, clause 4.1: "Overall equation for net carbon sequestration over 100 years":

"The overall equation is made of four terms (Figure 3). The first term (*E_{stored}*) describes the amount of carbon dioxide sequestered over a 100-year time horizon by the amount of biochar produced. Its calculation is explained in section 4.2, and is based on new results published in the peer reviewed scientific literature. The second term (*E_{biomass}*) describes the life cycle greenhouse gas emissions arising from the production and supply of biomass to the production facility, including direct land use changes. The third term (*E_{production}*) describes the life cycle greenhouse gas emissions arising from the transformation of the biomass into biochar, at the producing facility. Finally, the fourth term (*E_{use}*) describes the life cycle greenhouse gas emissions that occur along the distribution of the biochar up to its point of final use."

Weblink: [Puro.earth Biochar Methodology.pdf \(hubspotusercontent-na1.net\)](#)

Geologically Stored Carbon methodology follows the post-closure monitoring requirements of the EU Carbon Capture and Storage (CCS) Directive which is 20 years or less, or other national legislation such as the US Environmental Protection Agency Class VI injection wells. Geologically Stored Carbon clause:

"5.3. Evidence of the permanent storage

- Shipping documentation of the delivery of the captured CO2 to an injection and storage site, indicating that it is going to be used in permanent storage of carbon.
- Documentation that the storage site is classified and permitted under EU CCS or EPA criteria, as described in 1.1 Eligible Geological Storage types¹⁹ or following similar regulation if the storage site is not in an area to which the mentioned criteria apply to."

Weblink: [Puro.earth Geologically Stored Carbon Methodology.pdf \(hubspotusercontent-na1.net\)](#)

9) Confirm that your programme can demonstrate that it has a plan for possible

responses to the dissolution of the programme in its current form

Yes

Dissolution plan approach URL:

Confidential Information Submitted

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro's "Recovery and Orderly Dissolution (ROD) Plan" provides a pre-defined framework which can be applied if Puro.earth encounters material financial distress and needs to ensure that the crediting program continues operations with minimal disruption to the carbon market or key stakeholders. It maintains the solvency of Puro.earth and thereby reduces the risk of not providing its Critical Services (and any non-

Critical services assessed and decided to be continued) under a range of scenarios. There are several key objectives for Puro.earth covered in the plan:

1. Avoiding interruptions in performance to the customers and stakeholders of Puro.earth.
2. Minimizing the negative impact of distress on the carbon market and stakeholders' utilization of carbon certificates.
3. Eliminating reliance on an authority or potential future regulator to take discretionary actions.

The Recovery and Orderly Dissolution (ROD) plan is approved by the Board. This is a confidential plan, and we will submit it to the IC-VCM as required.

10) Confirm your programme has policies and robust procedures in place to prevent the programme staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of programme services

Yes

Fiduciary conflict of interest provisions and policy URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth%20Conflict%20of%20Interest%20Policy.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro.earth's Conflict of Interest Policy requires stringent, robust, and transparent handling of conflicts of interest to retain integrity, trust, and credibility in the market. It applies to general conflicts of interests that may arise for Puro and its staff, including board members, members of the Advisory Board, and consultants, where relevant. It covers both the Puro Standard and the public Puro Registry.

11) Confirm your programme has policies and robust procedures in place to ensure that, conflicts arising from programme staff, board members, and management having financial, commercial or fiduciary conflicts of interest, are appropriately declared, and addressed and isolated

Procedures to address identified fiduciary conflicts of interest URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth%20Conflict%20of%20Interest%20Policy.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, there are clear procedures to ensure that the conflicts of interest are declared, addressed and managed. In the Conflicts of Interest Policy, Section 6, "Conflict of Interest management procedure. 6.1

Management of conflicts of interest is a continuous obligation and includes the following steps:

1. Training.
2. Identification.
3. Registration.
4. Follow up – the conflict must be managed through mitigating actions, resolution procedures and/or client disclosure."

12) Confirm your programme has policies and robust procedures in place to prevent the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services

Yes

Procedures to address registry services conflicts of interests URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth%20Conflict%20of%20Interest%20Policy.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, any situation in which someone has competing interests (whether professional and/or personal) which may (actually or potentially) be an improper influence on the relevant decision-making process and make it difficult to fulfil their duties fairly is defined as a conflict of interest as seen in clause 2.1 of the Conflict of Interest Policy.

13) Confirm your programme has policies and robust procedures in place to ensure that, where conflicts arising from programme registry administrators from having financial, commercial or fiduciary interests in the governance or provision of registry services arise, they are appropriately declared, and addressed and isolated

Yes

Procedures to address identified registry conflicts of interest URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth%20Conflict%20of%20Interest%20Policy.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, as can be seen in the following clauses in the Conflict of Interest Policy:

6.12 : If a conflict of interest appears and the mitigating measures are not sufficient to eliminate the conflict, it needs to be escalated and resolved appropriately in Puro.

6.13 The relevant person should, without the need for evidence to be disclosed, subsequently stop working with the matter until the investigation has been completed and should be heard during the investigation process.

6.14 The CEO is responsible for the decision-making on the measures to be taken if a conflict has been identified. In cases of disagreement, or where the conflict of interest concerns a senior manager or any board member, the Chairperson and / or an independent board member should be in charge in the decision. Such decision making shall be dealt with at short notice.

Resolution measures can include:

- a. Increased monitoring of the conflict by line manager or Board.
- b. Disclosure to the affected party such as supplier or buyer in a timely manner. The exclusion of the conflicted staff member from the sensitive information.
- c. Restrictions to participate in discussions or decisions which may be subject to a conflict of interest.
- d. Exemption of duties and assignment to another staff member.
- e. Temporary or definite exclusion of the staff member from the relevant committee, steering group or management meeting.
- f. Subject to disciplinary actions, up to and including termination of employment of the relevant staff member, in accordance with applicable law.

14) If the program is not directly and currently administered by a public agency, can the program demonstrate up-to-date professional liability insurance policy of at least USD\$5M?

N/a

Professional liability insurance policy URL:

N/a

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

N/a

1.1 Effective Governance

In addition to CORSIA requirements related to governance framework, confirm that your organisation:

1) has a board comprised of independent board members who assume fiduciary responsibility for the organisation and operate according to robust bylaws.

Yes

Board members URL:

<https://carbon.puro.earth/about?p=board-of-directors>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, board members assume fiduciary responsibility for the organization as governed by the Finnish Corporate Law and their responsibilities are defined in the Board of Directors Charter.

The BOARD OF DIRECTORS CHARTER FOR PURO.EARTH OY includes under its clause 4.2 a description of the responsibilities of the Board. The text is as follows:

4.1 Tasks of the Board

The Board is responsible for the Company's administration and for the proper arrangement of supervision of financial management and business operations.

In order to carry out its tasks, the Board e.g. shall make decisions regarding material policies, strategy, investments, organization and financing, and decide on significant acquisition or transfer (including placing as collateral) of real estate, subsidiary or business. In addition, the Board has, inter alia, following tasks:

- to approve the annual plan of operations and budget;
- to approve the interim and annual financial statements and the annual report;
- to approve the organization and reward systems;
- to appoint and dismiss the Managing Director;
- to appoint the members of the management group;
- to approve the terms of employment of the Managing Director and other key personnel of the Company;
- to appoint the members of the committees appointed by the Board and approve rules of procedure of the committees;
- to direct and supervise the operational management of the Company;
- to monitor compliance with laws, rules and regulations;
- to approve long-term goals and strategies;
- to approve the principles and policies concerning the Company's values and the control and risk management system;
- to participate in or supervise litigation proceedings irrespective of whether the Company is a claimant or respondent, however not collection of debt of minor importance; and
- to convene the Shareholders' General Meetings.

2) publishes an annual report that contains the organisation's revenues, expenses, and net assets over the past year and provides an overview of the organisation's mission, major programs and activities, and governance.

Yes

Annual report URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Financial%20statements/Signed%20Puro.earth%20financial%20statements%202022.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This website takes you to the Annual Report for 2022. The Financial Statement for 2023 is under audit and will be published as soon as it is available.

3) Has processes in place to ensure corporate social and environmental responsibility.

Yes

Social and Environmental policy(ies) URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier Documents/Puro.earth_Environmental_and_Social_Policies.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The purpose of the “Environmental and Social Policies” is: “This document describes the corporate social and environmental procedures in Puro.earth for employees. It is important that whilst delivering on our mission to enable society to reward negative emissions that this is carried out in an ethically, social, and environmentally just manner.”

The document is organized as follows:

- 1 Purpose
- 2 Ethical guidelines
- 2.1 Compliance with Laws and Regulations
- 2.2 Conflict of Interest
- 2.3 Confidentiality and Data Protection
- 2.4 Fair Dealing
- 2.5 Respect in the Workplace
- 2.6 Reporting and Addressing Ethical Concerns
- 3 Environmental Responsibility
- 3.1 Conscious Travel and Digital Collaboration
- 3.2 Remote Work and Flexible Policies
- 3.3 Sustainable Office Practices
- 3.4 Measuring, Reporting, and compensation our Carbon Footprint
- 4 Social Responsibility
- 1.1 Embracing Diversity
- 1.2 Employee Development
- 1.3 Health and Well-being
- 1.4 Ethical Supply Chain Management
- 1.5 Zero Tolerance for Modern Slavery
- 5 The external landscape: engagement with Rule Makers

4) Has robust anti-money laundering processes in place.

Yes

Anti-money laundering policy/process URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth_KYB_KYC_%20AML_Policies.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

These policies cover Puro's **Know Your Business (KYB)**, **Know Your Customer (KYC)** and **Anti-money laundering (AML)** procedures.

5) follow practices consistent with robust anti-bribery and anti-corruption guidance and regulation.

Yes

Anti-bribery and anti-corruption policy/controls URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth_Anti-Bribery_Anti-Corruption_Policies.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

These policies cover Puro's **Anti-bribery and Anti-Corruption policy/controls**.

1.2 Public Engagement, Consultation and Grievances - CORSIA

CORSIA requirements related to public engagement, consultation and grievances:

1) Confirm that your programme publicly discloses what information is captured and made available to different stakeholders.

Yes

Stakeholder disclosure process/policy URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the program publicly discloses what information is captured and made available to different stakeholders through the project documentation in the Puro Registry and in the Public Consultation section in the Document Library of the website.

The Puro Registry is publicly accessible. There are two tabs on the Registry page, one lists projects and the other lists retirements as listed below:

<https://registry.puro.earth/carbon-sequestration/projects> <https://registry.puro.earth/carbon-sequestration/retirements>

Non-confidential information and reports about projects and the CO2 removal suppliers can be found in those sections.

In addition, the Public Consultation process is ruled by the General Rules v.4.0 and the Stakeholder Engagement Requirements.

Stakeholder engagement is mentioned in our General Rules v.4.0, clause 1.3.4 as follows:

“Should the review [of a Methodology] result in material revisions and/or new Methodologies, they shall be sent to public consultation before approval. Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter. Stakeholder comments are considered, and consultation results are published on the same website.”

The Puro Standard relies on public stakeholder consultations to make its rule-making transparent and informed. The Methodology Development Requirements details how we develop methodologies in line with the Stakeholder Engagement Requirements.

Puro Stakeholder Engagement Requirements, v.1.0 mandates that the result of the process be disclosed publicly in clause 2.5:

“After the public Stakeholder Engagement period has ended, Puro.earth shall formally address and, if relevant, incorporate the gathered feedback in the edits of its respective Methodology. This shall be documented in a summary of consultation outcomes, which shall be uploaded on the Puro.earth website within a reasonable time.”

Finally, our Stakeholder Engagement Requirements clearly covers public comments provisions and requirements, and how they are considered for both methodology development and Production Facilities.

The results from the consultations can be accessed with this link: [Document library - Public Consultation \(puro.earth\)](#)

2) Confirm that your programme publicly discloses its local stakeholder consultation requirements (if applicable)

Yes

Disclosure of stakeholder consultation requirements URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Stakeholder%20Engagement%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, local stakeholder consultation is required.

The Stakeholder Engagement Requirements are described in Section 2: Stakeholder Engagement in Individual Mitigation Activities and described in the following clauses:

1.1 Stakeholder Engagement shall be conducted if a new CO2 Removal Supplier seeks approval under the Puro Standard or if it makes any substantial changes to the design of its mitigation activity.

1.2 In case a public consultation was conducted before an application for the approval under the Puro Standard, e.g., due to requirements of local authorities, the CO2 Removal Supplier can possibly not be obliged to conduct a consultation as outlined in para 1.4. The following information shall be submitted to Puro.earth:

- a) A description of how Stakeholders were identified and invited;
- b) The information Stakeholders were provided with;
- c) A description of the means of conducting the consultation;
- d) A summary of the issues raised during the consultation;
- e) A description of how feedback from the consultation was considered and how issues were resolved. The Issuing Body will assess the information provided to make a project-specific adjustment on whether the extent of previous Stakeholder Engagement is sufficient.

1.3 If previous Stakeholder Engagement was considered sufficient, the CO2 Removal Supplier shall not be obliged to conduct a consultation as described in the course of this document. The most relevant information will be published along with other project documents in the Puro Registry.

1.4 In case the CO2 Removal Supplier has not conducted sufficient Stakeholder Engagement prior to application for approval under the Puro Standard, Stakeholder Engagement shall be conducted by independently organizing and hosting a public

Stakeholder consultation in an appropriate format commonly used in the local community.

3) Confirm that your programme publicly discloses its public comments provisions and requirements, and how they are considered (if applicable).

Yes

Disclosure of public comment provisions and considerations URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The Puro Standard considers two possible ways in which stakeholders can engage in with the Standard: First, in the development of the crediting program and the methodologies which set the rules for the activities to follow. Secondly, in the consultation requirements carried out by CO2 removal suppliers for their activities. These provisions are covered by the Puro Stakeholder Engagement Requirements v.1.0. In addition, we provide a template for CO2 removal suppliers to gather results and publish outcomes of the Stakeholder Engagement process. This template can be accessed in the Document Library with this link: [Stakeholder Engagement Report.docx \(live.com\)](#)

4) Confirm that your programme conducts public comment periods relating to methodologies, protocols, or frameworks under development

Yes

Public comment engagement on methodology development process/policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier Documents/Puro Method_Dev_Req.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, for the development or acceptance of any Methodology under the Puro Standard, our General Rules

v.4.0 require that industry stakeholders are identified and consulted. Clause 1.3.4, "Should the review result in material revisions and/or new Methodologies, they shall be exposed to public consultation before approval".

The [Puro Methodology Development Requirements](#) provide stakeholders the opportunity to participate in the development of a Methodology as described in these clauses:

214. The Issuing Body conducts public consultation on the consultation Methodology draft according to Stakeholder Engagement Requirements.

215. Public Consultation feedback is collected, addressed, and made publicly available in Puro.earth website.

Also, the stakeholders are invited to provide feedback during the revision process of Methodologies:

2.2.4. The Issuing Body conducts public consultation on the revised Methodology draft according to Stakeholder Engagement Requirements. In case of a minor revision, the Issuing Body can decide that a public consultation is not necessary.

The Puro Methodology Development Requirements can be accessed with this link: [Puro Method Dev Req.pdf \(hubspotusercontent-na1.net\)](https://7518557.fs1.hubspotusercontent-na1.net/Hubfs/7518557/Supplier%20Documents/Stakeholder%20Engagement%20Requirements.pdf)

5) Confirm that your programme conducts public comment periods relating to activities seeking registration or approval

Yes

Public comment engagement on activities process/policy URL:

<https://7518557.fs1.hubspotusercontent-na1.net/Hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

CO2 Removal Supplier must ensure stakeholder consultation of their activity before approval of a Production Facility under the Puro Standard. If CO2 Removal Supplier makes any substantial change to its Production Facility then it must also ensure further stakeholder consultation, as established the Stakeholder Engagement Requirements, section 2 that can be accessed via this link: [Stakeholder Engagement Requirements.pdf \(hubspotusercontent-na1.net\)](https://7518557.fs1.hubspotusercontent-na1.net/Hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf).

6) Confirm that your programme conducts public comment periods relating to operational activities (e.g., ongoing stakeholder feedback)

Yes

Public comment engagement on operational activities process/policy URL:

<https://7518557.fs1.hubspotusercontent-na1.net/Hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Stakeholder Engagement Requirements, Section 2: 5 (Feedback and grievance mechanism) Production Facilities are required to have an on-going feedback mechanism, such that, "stakeholders shall be given the opportunity to submit continuous feedback on the CO2 Removal Supplier's activity. The CO2 Removal Supplier shall therefore provide a means of contact to the public (e.g., e-mail address, phone number, letterbox)."

The Puro Stakeholder Engagement Requirements can be accessed via this link: [Stakeholder Engagement Requirements.pdf \(hubspotusercontent-na1.net\)](https://7518557.fs1.hubspotusercontent-na1.net/Hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf).

7) Confirm that your programme conducts public comment periods relating to additions or revisions to programme procedures or rulesets

Yes

Public comment engagement on programme procedures process/policy URL:

<https://7518557.fs1.hubspotusercontent-na1.net/Hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The program conducts public comment periods relating to additions or revisions to program procedures or rulesets as defined in the following clauses of the General Rules v.4.0:

1.3.3 The Advisory Board may request revision to the Puro Standard and Methodologies as necessary. A review is requested when either an Advisory Board Member or Puro.earth management deems that significant changes have occurred in regulations, technologies, carbon accounting, or other provisions.

1.3.4 Should the review result in material revisions and/or new Methodologies, they shall be sent to public consultation before approval. Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter. Stakeholder comments are considered, and consultation results are published on the same website.

Weblink to the General Rules v.4.0: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf)

8) Summarize the level at which activities are allowed under the programme (e.g., project based, programme of activities, jurisdiction-scale). Provide evidence of the programme information defining this and confirm it is made availability to the public.

Summary of programme activities activities URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The program allows project-based activities as established in clause 2.1 of Puro's General Rules v.4.0: "2.1 PROJECT DEVELOPMENT

2.1.1 A CO2 Removal Supplier develops a *project* with the purpose of sequestering and storing carbon durably." (emphasis added).

9) Summarize the eligibility criteria for each type of offset activity (e.g., which sectors, project types, and geographic locations are covered). Provide evidence of the Programme information defining this and confirm its availability to the public.

Public comment engagement on eligibility criteria for types of offset activity approach URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro Standard eligible project types are engineered carbon removal activities providing long term storage of carbon in any sector or any country. Eligibility is not limited by geographic location.

In the Definitions section (Page 21) of the General Rules v4.0, "Methodology – Methodology provides eligibility requirements to verify the compliance of the CO2 Removal activity. A

Methodology provides robust CO₂ Removal quantification rules specific to each carbon removal pathway. It specifies the activity boundaries, detailed calculation formulas and the proof needed for the activity performance. A Methodology may be revised. A List of the valid Methodologies is available on the Puro.earth website. [Document library - Methodologies \(puro.earth\)](#)

In the General Rules v4.0, clause 1.3.5.2, "The Methodology shall address the following components: (i) Applicability or eligibility criteria of the Puro Standard and those specific to the CDR process."

CO₂ Removal Certificates (CORCs) are only issued for CO₂ which is stored for 100 years or more, clause 3.2.4, "A CORC represents a volume of 1 (one) metric ton of Net Carbon Dioxide Removal stored Long Term." Long Term refers to at least 100 years.

Also, from the Definitions section (Page 2 Long-term duration - Long-term refers to the duration of carbon storage and is defined as a minimum length of 100 years.

The quantification of the durable CO₂ removal following the rules in the Life Cycle Assessment Procedure as stated in Section 6 of the General Rules v4.0, "6 REQUIREMENTS FOR CO₂ REMOVAL SUPPLIERS 6.1 QUANTIFICATION OF CARBON REMOVAL 6.1.1 The CO₂ Removal Supplier shall determine the Net CO₂ Removal volume as specified in the applicable Methodology. 6.1.2 The Net CO₂ Removal volume is determined by subtracting from the gross CO₂ Removal volume any greenhouse gas emissions generated directly or indirectly by the Production Facility following the rules specified in the applicable Methodology and in the [Life Cycle Assessment Guidance](#)."

1.2 Public Engagement, Consultation and Grievances

In addition to CORSIA requirements related to public engagement, consultation and grievances, confirm your organisation has processes for:

1) robust and transparent local and global stakeholder consultation processes, which provide for public comment and issue resolution.

Yes

Stakeholder consultation policy/controls URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The program has robust and transparent local and global stakeholder consultation processes, which provide for public comment and issue resolution.

The process is required by the General Rules in clause 1.3.4 as follows:

"Should the review [of a Methodology] result in material revisions and/or new Methodologies, they shall be sent to public consultation before approval. Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter. Stakeholder comments are considered, and consultation results are published on the same website." Weblink: [Puro.earth General-Rules v.4.0.pdf \(hubspotusercontent-na1.net\)](#)

Moreover, the stakeholder consultation process is ruled by the [Stakeholder Engagement Requirements](#). These requirements describe two ways in which stakeholders can engage with the Issuing Body. The first is in the [Puro Standard Development](#) as described in the following clauses of Section 1:

Page 5 clause 1.1 The objective of Stakeholder Engagement is to inform and to give Stakeholders a meaningful way of participating in the process of Methodology formulation, to draw the benefits that come from including a range of diverse viewpoints, and to identify key Stakeholders in the design and improvement of Puro.earth's Methodologies.

Page 5 clause 1.2 Stakeholder Engagement shall be conducted if Puro.earth makes material updates to or releases new Methodologies.

Page 5 clause 1.3 Stakeholder Engagement shall be implemented through an online public Stakeholder consultation period, during which Stakeholders may submit feedback.

Page 5 clause 1.4 Feedback can be submitted through a comment questionnaire, direct message on Puro.earth website, or in a consultation webinar.

In addition, the Puro Standard requires that CO2 removal suppliers engage local stakeholders that could be impacted by their Individual Mitigation Activities. The rules for this process are described in these clauses of Section 2 of the Stakeholder Engagement Requirements:

Page 8 clause 1.1 Stakeholder Engagement shall be conducted if a new CO2 Removal Supplier seeks approval under the Puro Standard or if it makes any substantial changes to the design of its mitigation activity.

Page 8 clause 1.2 In case public consultation was conducted before application for approval under the Puro Standard, e.g., due to requirements of local authorities, the CO2 Removal Supplier can possibly not be obliged to conduct a consultation as outlined in para 1.4. The following information shall be submitted to Puro.earth:

- a) A description of how Stakeholders were identified and invited;
- b) The information Stakeholders were provided with;
- c) A description of the means of conducting the consultation;
- d) A summary of the issues raised during the consultation;
- e) A description of how feedback from the consultation was considered and how issues were resolved. Puro.earth will assess the information provided to make a project-specific adjustment on whether the extent of previous Stakeholder Engagement is sufficient.

Page 8 clause 1.3 If previous Stakeholder Engagement was considered sufficient, the CO2 Removal Supplier shall not be obliged to conduct a consultation as described in the course of this document. The most relevant information will be published along with other project documents in the Puro Registry.

Page 8 clause 1.4 In case the CO2 Removal Supplier has not conducted sufficient Stakeholder Engagement prior to application for approval under the Puro Standard, Stakeholder Engagement shall be conducted by independently organizing and hosting a public Stakeholder consultation in an appropriate format commonly used in the local community.

Page 8 clause 1.5 When activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO2 Removal Supplier shall develop the Production Facility with free, prior, informed consent (FPIC). FPIC is a good practice in case of local communities.

2) addressing grievances. The process shall be clear and transparent, ensure impartiality and where appropriate confidentiality, in the filing and resolution of grievances. Any applicable fees shall not impede legitimate access to the grievance process by civil society organisations or IPs & LCs.

Yes

Stakeholder grievances policy/controls URL:

<https://7518557.fs1.hubspotusercontent->

na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth%20Grievance%20Policy.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The process to address grievances is described under the Puro Standard Grievance Policy (1.0), clauses:

41 Any stakeholder may submit a grievance to Puro.earth following the procedure outlined in this Grievance Policy. By submitting a grievance, the complainant agrees to the provisions of this Grievance Policy.

42A Stakeholder can opt to be anonymous upon written request in the Puro.earth's external reporting of the complaint.

43A guiding principle in the Grievance Policy is to achieve the highest possible transparency in the grievance process and decision making to ensure that trust, credibility, and integrity is built into Puro.earth's CDR certificates and its registry. Moreover, the process around any complaint or appeal should follow a pre-defined timetable with swift handling of any submitted item.

2.1 Effective Registries (Retirement and Addressing Erroneous Issuance) - CORSIA

CORSIA requirements related to carbon credits in your carbon-crediting program registry:

1) Confirm that your programme defines and ensures the underlying attributes of a unit

Yes

Definition of underlying attributes policy/provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, under clause:

3.2.4.1 Each CORC shall specify the following Attributes:

1. Unique identifier.
2. Issuance Date.
3. CO2 Removal Methodology and its version.
4. CORC100+ or CORC1000+ label to communicate the storage durability of the Methodology.
5. Production Facility identity, name, and location of the Production Facility.
6. Host country and sector of the Production Facility.
7. Monitoring Period first and last dates of the Output Report.
8. Specific information as may be specified in the corresponding Methodology.
9. Other Attributes as required.

2) Confirm that your programme defines and ensures the underlying property aspects of a unit

Yes

Definition of underlying property aspects policy/provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the program defines and ensures the underlying property aspects of a unit, the General Rules v4.0 defines a CO2 Removal Certificate (CORC) as a “ CO2 Removal Certificate is an electronic document, which records the Attributes of CO2 Removal from registered Production Facilities. Each CORC represents a Net Carbon Dioxide Removal volume of 1 ton of Long-Term CO2 Removal.”

Furthermore, the General Rules define under clause 1.1.3 that, “All processes aim to exclude the possibility of more than one CORC being Issued for the same volume of CO2 Removal and that the CORC Issued represents the sole proof of ownership of the associated CO2 Removal Attributes.”

3) Confirm that your programme utilises an electronic registry or registries

Yes

Programme registry URL:

<https://registry.puro.earth/carbon-sequestration/retirements>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The Puro Registry is publicly accessible. There are two tabs on the Registry page, one lists projects and the other lists retirements as listed below:

<https://registry.puro.earth/carbon-%20sequestration/retirements>

<https://registry.puro.earth/carbon-sequestration/retirements>

The Puro.earth program utilizes an electronic registry system, and the Registry is administered by Puro.Earth Oy as defined in the General Rules v4.0, clause 1.1:

“Puro Standard, Registry and System”

1.1.2. The Puro Standard and the Registry are a program for the issuing, transferring, and retiring of CO2 Removal Certificates (CORCs). In the System, Production Facilities capable of removing CO2 are independently audited and certified. CORCs are issued for verified volume of Long-Term Net Carbon Dioxide Removal realized over a time in these Production Facilities. These CORCs are then transferable to other Account Holders. The value of the CORC is realized by Retirement, thereby removing it from circulation and making the Beneficiary of the Retirement the sole owner of the CO2 Removal Attributes.

1.1.5. The Registry stores information of the CORCs issued, transferred, and retired.

4) Confirm that your programme has procedures in place to ensure that the programme registry or registries have the capability to transparently identify emissions units that are deemed CCP-approved, in all account types

Yes

CCP-identification of emissions units policy/procedures URL:

<https://registry.puro.earth/carbon-sequestration/retirements>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We will add in the registry a label as “CCP Approved” to all emission units deemed eligible. This will be publicly available after the ICVCM assessment process is finalized.

5) Confirm that your programme has procedures in place to ensure that the programme registry or registries identify, and facilitate tracking and transfer of, unit ownership/holding from issuance to cancellation/retirement

Yes

Tracking of units policy/procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The Puro Registry is a digital tracking system for managing Account Holders of the Registry and tracking CORCs (units). The program has procedures to ensure the Puro Registry identifies, facilitates and tracks units from issuance, through transfer of ownership, to retirement as established in the General Rules v4.0 clause

1.1.5 “The Registry stores information of the CORCs issued, transferred, and retired”.

6) Confirm that your programme has procedures in place to ensure that the programme registry or registries identify unit status, including retirement / cancellation, and issuance status

Yes

Emissions units status identification procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the unit status (CORC) is visible showing from which project the unit was issued and whether it has been retired or not. The program has in place procedures where units are identified and designated on the public platform Puro Registry (weblink: <https://registry.puro.earth/carbon-sequestration/retirements>), where units country of origin and vintages (issuance years) are visible. The identification of units will change from Q2 2024 onwards. The new identity number will hold the country of origin and vintage in the identification number.

In General Rules v.4.0, clause 5.1.2 describes the public reports that identify the unit status:

“Issuances and Retirements are available in the Registry with details about the Beneficiary,

the Vintage of the CORC and the Production Facility of the CO2 Removal Supplier. The data is updated at minimum daily. The Beneficiary can request a reasonable time delay, no longer than 12 months, in publishing Beneficiary and Retirement purpose.”

7) Confirm that your programme has procedures in place to ensure that the programme registry or registries assigns unique serial numbers to issued units

Yes

Assigning unique serial number to issued emission units procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the program has procedures to ensure units are uniquely identified with serial numbers according to clause 3.1.1 and 3.5.5.1 of the General Rules v4.0. The unique identifier in the third column in the public Puro Registry in the weblink: <https://registry.puro.earth/carbon-sequestration/retirements> .

Clause 3.1.1:

CORCs (CO2 Removal Certificates) are uniquely identified in the Registry and each CORC's chain of custody is tracked from when the CORC is issued through to its Transfer or Retirement. All Transactions are subject to service fees as defined in the Platform Agreement.

Clause 3.5.1:

The aim of using the Registry to track CO2 Removal activity and CORCs (CO2 Removal Certificates) is to prevent the possibility of double counting. All processes aim to exclude the possibility of more than one CORC being issued for the same volume of CO2 Removal and that the CORC issued represents the sole proof of ownership of the CORC and associated CORC Attributes.

3.5.1.1 The procedures in place prevent:

- i. Double registration within the Registry.
- ii. Double registration outside of the Registry for CO2 Removal activities.
- iii. Double issuance of CORCs where another program has issued credits for the same project activity during the same period.
- iv. Double retirement and use by two Beneficiaries and being counted towards achieving two mitigation targets.
- v. Double use within the supply chain.
- vi. Double counting in the context of Article 6 of the Paris Agreement.

8) Confirm that your programme has procedures in place to ensure that the programme registry or registries identify in serialization, or designate on a public platform, each unique unit's country and sector of origin, vintage, and original (and, if relevant, revised) project registration date

Yes

Identification of emission unit origin, vintage, and project registration date procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The program has in place procedures where units are identified and designated on the public platform Puro Registry (weblink: <https://registry.puro.earth/carbon-sequestration/retirements>), where each units country or origin and vintages (issuance years) are visible.

In the General Rules v4.0, clause 3.2.4.1:

"Each CORC shall specify the following Attributes:

- i. Unique identifier.
- ii. Issuance Date.
- iii. CO2 Removal Methodology and its version.
- iv. CORC100+ or CORC1000+ label to communicate the storage durability of the Methodology.
- v. Production Facility identity, name, and location of the Production Facility.
- vi. Host country and sector of the Production Facility.
- vii. Monitoring Period first and last dates of the Output Report.
- viii. Specific information as may be specified in the corresponding Methodology.
- ix. Other Attributes as required."

Each Production Facility is registered with a Crediting Period (project registration date). In General Rules v4.0 clause 2.4.1:

"The first date of the first Monitoring Period marks the beginning of a Crediting Period. The Crediting Period lasts 5 years unless otherwise stated in the applicable Methodology. The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit. The Crediting Period shall not overlap with another Crediting Period."

9) Confirm that your programme has procedures in place to ensure that the programme registry or registries are secure (i.e. that robust security provisions are in place)

Yes

Registry security policy/procedures URL:

Confidential Information Submitted.

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the program registry has procedures to ensure that the Puro Registry provides a secure, reliable registry platform for carbon removal for registering account holders, unit tracking and transactions.

Puro Registry employs strict access control policies ensuring that only individuals authorized have access to sensitive data and operations within the registry limited to their role. For public access, users do not need user identification or authentication. The public data is freely

accessible to all parties. <https://registry.puro.earth/>

The core registry platform is provided as a SaaS service by Nasdaq. For data protection Puro Registry utilizes Azure Database for PostgreSQL Flexible Server, which by default employs Azure Storage encryption to secure data at-rest. This encryption ensures robust security measures are automatically in place for our data storage.

Puro Registry has continuous monitoring and logging of transactions to provide traceability and an audit trail for security assurance and compliance purposes. Puro Registry employs advanced monitoring to quickly identify security incidents, ensuring continuous oversight and high performance.

Puro Registry adheres to international best practices and standards for data protection and cybersecurity, ensuring that our protocols meet or exceed the required benchmarks for security compliance. We conduct data security audits regularly.

The registry security policy/procedures has been shared as "confidential" documentation with the assessment team.

10) Confirm that your programme's registry(ies) conform to international data exchange standards

Yes

International data exchange standards URL:

<https://docs.api.puro.earth/docs/overview/>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro Registry conforms with and offers an Application Programming Interface (API) for data exchange with other digital systems. Puro Connect API was introduced in October 2023 for commercial users. The technical documentation and instructions on how to get started with the API is available at the link above.

11) Confirm that your programme has provisions in place to ensure the screening of requests for registry accounts

Yes

New registry account screening policy/procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the Program has provisions in place ensuring the screening of requests for registry accounts. The screening of access to registry accounts is done with strict access control. Know Your Customer checks are mandated by our General Rules v4.0 under clause 1.1.4 that states "All System participants need to be registered Account Holders of the System and need to have signed the Platform Agreement. The Issuing Body shall perform standard know your customer checks for each Account Holder".

12) Confirm that your programme has provisions in place to restrict the programme registry (or registries) accounts to registered businesses and individuals

Yes

New registry account screening policy/procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the Programme has provisions in place "restricting accounts to registered businesses" under clause

1.1.4. of the General Rules. Account Holders in the Puro Registry are businesses, we do not open registry accounts for individual consumers. "1.1.4 All System participants need to be registered Account Holders of the System and need to have signed the Platform Agreement. The Issuing Body shall perform standard know your customer checks for each Account Holder."

13) Confirm that your programme has provisions in place to ensure the periodic audit or evaluation of registry compliance with security provisions

Yes

Registry compliance with security provisions approach/procedures URL:

Confidential Information Submitted

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro Registry adheres to international best practices and standards for data protection and cybersecurity. We conduct data security assessments regularly. The previous periodic audit conducted on Puro.earth registry services showed that the registry maintains an elevated level of data security.

The registry compliance with security provisions has been shared as "confidential" documentation with the assessment team.

2.1 Effective Registries (Retirement and Addressing Erroneous Issuance)

In addition to CORSIA requirements related to carbon credits in your carbon-crediting program registry, confirm that your organisation:

1) requires identification of the entity on whose behalf the carbon credit was retired

Yes

Retirement entity identification policy/process URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause:

“3.3.3.1 The Retirement request shall specify the amount of CORCs to be retired along with the following Retirement information:

i. Beneficiary entity name.”

2) requires the identification of the purpose of retirement

Yes

Retirement purpose identification policy/process URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause:

“3.3.3.1 The Retirement request shall specify the amount of CORCs to be retired along with the following Retirement information:

ii. Use purpose: identification of the purpose of the Retirement.”

3) has procedures to address erroneous issuance of carbon credits that identify remedial measures (e.g., cancellation, compensation through replacement) and the entities responsible for implementing these.

Yes

Erroneous issuance policy/process URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause:

“3.4.1. To maintain the accuracy and veracity of the System, the Issuing Body has the right to withdraw CORCs from an Account Holder’s Account.

3.4.1.1 This can take place in case: i. An error has occurred in the issuing, transferring or other processing of the CORC. ii. Due to a material breach of the Puro Standard. iii. To balance the accounts in case of CO2 Removal reversals according to Chapter 6.7 procedures.

3.4.2. The Issuing Body is entitled to alter the details of CORCs to rectify any errors that have occurred in the Issuance or Transfer process.”

3.1 Information - CORSIA

Please respond to each question below.

CORSIA requirements related to transparency:

2) Confirm that your programme has the procedures in place to ensure that the results of validation and verification are made publicly available

Yes

Public disclosure of validation and verification results policy/procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause:

“5.1.1 Audit Statements, Audit Reports, registrations, and project descriptions are publicly available from the Registry. The CO2 Removal Supplier may request to redact confidential or personal information subject to Issuing Body approval.”

These reports are published in the project’s registry page [Puro.earth | Registry](#)

3.1 Information

Please respond to each question below.

a) In addition to CORSIA requirements, confirm that your organisation ensures that in relation to each mitigation activity that requests registration or that is registered, all relevant documentation relating to the mitigation activity is made publicly available (subject to confidentiality and proprietary, privacy and data protection restrictions) including:

1) all necessary information, such as spreadsheets used for calculations, to enable third parties to assess the social and environmental impacts of the mitigation activity and to replicate the GHG emission reduction or removal calculations (including baseline quantification), and assessment of additionality.

Yes

Information disclosure policy/process URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause:

“2.3.3.4 With a successful Output Review outcome

- i. CO2 Removal Supplier can move to CORC Issuance.
- ii. Output Audit Report and Statement is made public in the Registry.
- iii. Production Facility documentation is made public in the Registry; this includes:
 - a. Project Description

- b. Location.
- c. CO2 Removal Supplier.
- d. Methodology and technology details.
- e. Baseline and Additionality Assessment Report.
- f. Stakeholder Consultation Report.
- g. Environmental and Social safeguards assessment.
- h. Positive SDG impacts description.
- i. Verified Output quantification for the Monitoring Period as defined in CORC quantification of applicable Methodology.

In addition, under clause:

5.1.1 Audit Statements, Audit Reports, registrations, and project descriptions are publicly available from the Registry. The CO2 Removal Supplier may request to redact confidential or personal information subject to Issuing Body approval.”

2) a mitigation activity design document that includes:

- i. a non-technical summary.
- ii. detailed information on the mitigation activity, including its location and proponents.
- iii. a description of the technology or practices applied.
- iv. the environmental and social impacts.
- v. the methodology used.
- vi. information on how the methodology is and has been applied for the purpose of determining the baseline, demonstrating additionality and quantifying GHG emission reductions or removals.

Yes

Mitigation activity design document provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In Puro Standard the design document is the Project Description. In the General Rules v4.0, clause:

2.3.3.4 With a successful Output Review outcome

- i. CO2 Removal Supplier can move to CORC Issuance.
- ii. Output Audit Report and Statement is made public in the Registry.
- iii. Production Facility documentation is made public in the Registry; this includes:
 - a. Project Description
 - b. Location.
 - c. CO2 Removal Supplier.
 - d. Methodology and technology details.
 - e. Baseline and Additionality Assessment Report.
 - f. Stakeholder Consultation Report.
 - g. Environmental and Social safeguards assessment.
 - h. Positive SDG impacts description.
 - i. Verified Output quantification for the Monitoring Period as defined in CORC quantification of applicable Methodology.

The Puro.earth registry has a dedicated page for each project, and on each project webpage, there is a 'project documents' section. A 'project description' document is included in this section which covers a non-technical summary of the project.

3) For Categories listed in 9.1 b) 1, information relating to the monitoring and compensation period. URL:

N/A

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Not Applicable. Activities listed in 9.1 b) are not eligible activities under the Puro Standard.

b) Confirm that your organisation shall ensure all relevant program documents are publicly available and has processes to ensure that where requests are made in relation to information that is missing from your website and/or registry, that information is provided (subject to confidentiality and proprietary, privacy and data protection restrictions) and made public alongside other relevant public information.

Yes

Information request policy/process URL:

N/A

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Not Applicable. Activities listed in 9.1 b) are not eligible activities under Puro Standard.

4.1 Robust Independent Third-Party Validation and Verification - CORSIA

CORSIA requirements related to robust independent third-party validation and verification:

1) Confirm that your programme has standards, requirements, and procedures in place for the validation of activities

Yes

Validation of activities policy/procedures URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Validation%20&%20Verification%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In summary, the General Rules v4.0 require all Production Facilities to undergo validation of activities which is an independent assessment by a Verification and Validation Body (VVB)

which determines whether the project complies with the relevant methodology. Verification refers to a periodic ex-post independent assessment by a VVB of the CO2 removals that have occurred because of the project which we refer to as the Annual Output Audit Report.

General Rules v.4.0 clause:

2.2.1 Design validation ... involves a Production Facility Audit by an independent 3rd party auditor, followed by a Production Facility Review by the Issuing Body.

2) Confirm that your programme has standards, requirements, and procedures in place for the verification of emissions reductions

Yes

Verification of emission reductions policy/procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v4.0, section 2.3 we describe the standards, requirements, and procedures in place.

2.3 PERFORMANCE VERIFICATION

231 Performance verification involves an Output Audit by an independent 3rd party Auditor, followed by Output Review by the Issuing Body.

232 Output Audit

2321 An Output Audit may start when the CO2 Removal Supplier has submitted an Output Report for a Production Facility for a given Monitoring Period.

2322 An Output Audit is conducted by an independent 3rd party Auditor. The Issuing Body will appoint one Auditor from the list of accredited auditors. The same auditor may conduct the Production Facility Audit and the Output Audit.

2323 An Output Audit includes a desk study and a site visit by the Auditor to verify the performance of the Production Facility for the given Monitoring Period. The site visit may be conducted as a remote site visit. Verification is performed to determine that the reported volume of CO2 Removal has taken place, and the Production Facility conforms with the requirements of the Puro Standard General Rules and applicable Methodology.

2324 The Auditor verifies that the Output Report corresponds to the actual Output during the Monitoring Period according to the Methodology. The Output Auditor submits their evaluation on the performance of the CO2 Removal activity in the Output Audit Report and Output Audit Statement. 2.3.2.5 The Issuing Body publishes the Output Audit Report and Statement in the Registry.

3) Confirm that your programme has standards, requirements, and procedures in place for the accreditation of validators

Yes

Accreditation of validators policy/procedures URL

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Validation%20&%20Verification%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We refer to validators and verifiers as auditors in the General Rules, and in clause 1.4.1, we require them to be accredited. "The Issuing Body is responsible for accreditation and oversight of Auditors according to the Validation and Verification Requirements. A list of Auditors accredited by the Issuing Body is available on the Puro.earth website."

As stated in the [Validation & Verification Requirements](#) (section 2. Accreditation), Auditors shall obtain their accreditation from:

- 1) International Accreditation Forum (IAF) member according to the ISO 14065 (General Principles and Requirements for Bodies Validating and Verifying Environmental Information) or ISO 14066 (Greenhouse Gases) or other relevant ISO Standard;
- 2) United Nations UNFCCC4 CDM Executive Board according to the CDM Accreditation Standard for Designated Operational Entities, or by a new relevant accreditation system under the UNFCCC;
- 3) National or international emission allowance/reduction program; or, Other relevant accreditation system.

4) Confirm that your programme has standards, requirements, and procedures in place for the accreditation of verifiers

Yes

Accreditation of verifiers policy/procedures URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Validation%20&%20Verification%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We refer to validators and verifiers as auditors in the General Rules, and in clause 1.4.1 we require them to be accredited. "The Issuing Body is responsible for accreditation and oversight of Auditors according to the Validation and Verification Requirements. A list of Auditors accredited by the Issuing Body is available on the Puro.earth website."

As stated in the [Validation & Verification Requirements](#) (section 2. Accreditation), Auditors shall obtain their accreditation from:

- 2) International Accreditation Forum (IAF) member according to the ISO 14065 (General Principles and Requirements for Bodies Validating and Verifying Environmental Information) or ISO 14066 (Greenhouse Gases) or other relevant ISO Standard;
- 3) United Nations UNFCCC4 CDM Executive Board according to the CDM Accreditation Standard for Designated Operational Entities, or by a new relevant accreditation system under the UNFCCC;
- 4) National or international emission allowance/reduction program; or,
- 5) Other relevant accreditation system.

Furthermore, in the [Validation & Verification Requirement](#)s we have oversight requirements in Section 5, as copied below.

1. Oversight

All Validation and Verification Bodies (VVBs) shall be witnessed every 5 years to ensure quality, consistency, and integrity of the audits being conducted. The witness audits may be

carried out internally by the accredited VVB with oversight of the witness audit program by the VVB's accreditation body. Puro.earth has the right to attend Audits.

Verification and validation audit reports shall receive a quality check by the Puro.earth prior to the issuance of CORCs. Records of quality checks shall be retained in the project file for all projects. In the event of any observed deficiencies, the report will be returned to the auditor for correction and/or clarification. CORCs shall not be issued until the quality of the report has been deemed satisfactory.

In the event of repeat quality issues within the report or any other aspect of the 3rd party audit, Puro.earth

will suspend or revoke the Lead Auditor or VVB from the approved auditor list. Decisions on suspension or revocation are at the sole discretion of Puro.earth. Depending on the nature and severity of the quality issues, any revocation of a Lead Auditor or VVB from the approved auditor list may not be permanent and a pathway to reinstatement may be provided. Any decision to suspend or revoke a Lead Auditor from the approved auditor list may be appealed."

5) Confirm that your program has procedures in place to ensure that validation occurs prior to or in tandem with verification

Yes

Validation timing policy/procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The program has procedures in place to ensure that design validation occurs prior to, or in tandem, with performance verification. In the General Rules v.4.0, clause 2.2 Design Validation and 2.2.1 Design validation (see Figure 2) involves a Production Facility Audit by an independent 3rd party auditor, followed by a Production Facility Review by the Issuing Body.

This process ensures that the facility meets the requirements of the Puro Standard to deliver CO2 removal.

This process is followed by the Performance Verification where the amount of CO2 removal is reviewed, as described in clause 2.3:

2.3.1 Performance verification involves an Output Audit by an independent 3rd party Auditor, followed by Output Review by the Issuing Body.

Furthermore, in General Rules v.4.0, Figure 2 in page 6, validation occurs prior to verification generally. Sometimes, it can happen concurrently, Clause 2.3.4 titled "Combining Production Facility Audit and Output Audit" regulates the scenario where validation and verification are performed in tandem.

6) Confirm that your program has procedures in place to ensure that mitigation is measured and verified by an accredited and independent third-party verification entity

Yes

Measurement and verification requirements using independent third-party entities URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Validation%20&%20Verification%20Require>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v4.0, section 3.4, performance verification, specifically clause 2.3.2.3 and 2.3.2.4:

An Output Audit includes a desk study and a site visit by the Auditor to verify the performance of the Production Facility for the given Monitoring Period. The site visit may be conducted as a remote site visit. Verification is performed to determine that the reported volume of CO₂ Removal has taken place, and the Production Facility conforms with the requirements of the Puro Standard General Rules and applicable Methodology. 2.3.2.4 The Auditor verifies that the Output Report corresponds to the actual Output during the Monitoring Period according to the Methodology. The Output Auditor submits their evaluation on the performance of the CO₂ Removal activity in the Output Audit Report and Output Audit Statement.

In the [Validation and Verification Requirements](#) it states that the auditor must be accredited and independent under Section 2:

“2. Accreditation

Validation and Verification Bodies (VVBs) conducting independent third-party audits to Puro Standard carbon removal crediting program shall be accredited. VVBs shall obtain their accreditation from

1. International Accreditation Forum (IAF) member according to the ISO 14065 (General Principles and Requirements for Bodies Validating and Verifying Environmental Information) or ISO 14066 (Greenhouse Gases) or other relevant ISO Standard;
2. United Nations UNFCCC CDM Executive Board according to the CDM Accreditation Standard for

Designated Operational Entities, or by a new relevant accreditation system under the UNFCCC;

3. National or international emission allowance/reduction program; or,
4. Other relevant accreditation system. The accreditation shall be current during the validation and verification process, as well as during the period of submission of the final audit report.”

The accreditation shall be current during the validation and verification process, as well as during the period of submission of the final audit report.

7) Confirm that your programme has procedures in place to ensure that ex-post verification of mitigation is required in advance of issuance of emissions units

Yes

Verification and issuance of emission units policy/procedures URL

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the program has in place procedures to ensure that *ex-post* verification of mitigation is required in advance of issuance of emissions units. Only after verification by the third-party auditor and review by the program (Issuing Body) are CORCs (emission units) issued.

In the General Rules v4.0, clauses:

“2.3.3 Output Review

2331 Output Review is conducted by the Issuing Body. It involves reviewing the Output Audit Report and the documentation submitted by the CO2 Removal Supplier for the Output Audit.

2332 The Output Review of a Production Facility may result in

- i. A successful Output Review.
- ii. An unsuccessful Output Review.

2333 With an unsuccessful Production Facility Review outcome, the CO2 Removal Supplier will have a reasonable opportunity to address the identified non-conformity issues within 30 days and submit once new/revised documentation for a re-review.

2334 With a successful Output Review outcome i. CO2 Removal Supplier can move to CORC Issuance.”

8) Confirm that your programme has provisions in place to manage and/or prevent conflicts of interest between accredited third-party(ies) performing the validation and/or verification procedures, and the programme and the activities it supports

Yes

Third-party verification entity conflict of interest policy/procedures URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Validation%20&%20Verification%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, we have a conflict of interest procedures for VVBs, in Section 6, as copied below.

6 Conflict of Interest

For each audit assignment, Validation and Verification Bodies (VVBs) shall confirm in writing that they are independent from the entity subject to validation and verification. Functionally, this will take place using the following process:

1.) In the request for proposal (RFP) the VVB declares:

“By quoting to this audit project, you – the independent, third-party validation and verification body - declares that you are an impartial auditor, free from any conflicts of interest, capable, and qualified to complete this audit according to Puro Standard and related Validation and Verification Body Requirements.”

9) Confirm that your programme has provisions in place requiring accredited third-party(ies) to disclose whether they or any of their family members are dealing in, promoting, or otherwise have a fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated

Yes

Fiduciary disclosure for verifiers policy/procedures URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Validation%20&%20Verification%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, we have a fiduciary disclosure procedures for VVBs, in Section 6, as copied below.

5. Conflict of Interest

For each audit assignment, Validation and Verification Bodies (VVBs) shall confirm in writing that they are independent from the entity subject to validation and verification. Functionally, this will take place using the following process:

2.) In the request for proposal (RFP) the VVB declares:

"By quoting to this audit project, you – the independent, third-party validation and verification body - declares that you are an impartial auditor, free from any conflicts of interest, capable, and qualified to complete this audit according to Puro Standard and related Validation and Verification Body Requirements."

10) Confirm that your programme has provisions in place to address and isolate such conflicts, should they arise

Yes

Resolution of fiduciary conflicts for verifiers policy/procedures URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro.earth%20Conflict%20of%20Interest%20Policy.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, there are clear procedures to ensure that conflicts of interest are declared, addressed, and managed. In the Conflict of Interest Policy, under:

5.1 Management of conflicts of interest is a continuous obligation and includes the following steps:

- i. Training.
- ii. Identification.
- iii. Registration.
- iv. Follow up – the conflict must be managed through mitigating actions, resolution procedures and/or client disclosure.

7.1 Where a conflict of interest appears, the relevant staff shall immediately report to the Compliance Director for investigation."

11) Confirm that your programme has procedures in place requiring that the renewal of any activity at the end of its crediting period includes a re-evaluation of its baselines, and procedures and assumptions for quantifying, monitoring, and verifying mitigation, including the baseline scenario

Yes

Renewal of mitigation activities requirements/procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0 clause 2.4.1 establishes that for the renewal of the crediting period a new Production Facility Audit shall be performed, hence requiring new baseline and additionality assessments. Relevant text:

"2.4.1 The first date of the first Monitoring Period marks the beginning of a Crediting Period. The Crediting Period lasts 5 years unless otherwise stated in the applicable Methodology. The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit. The Crediting Period shall not overlap with another Crediting Period."

12) Confirm that your programme has procedures in place requiring that the same procedures apply to activities that wish to undergo verification but have not done so within the programme's allowable number of years between verification events. *If yes, provide evidence, including identifying the allowable number of years between verification events.

Yes

Verification of mitigation activities outside of the allowable number of years between verification events requirements/procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We require annual verification as stated in the General Rules v4.0 clause 3.2.5. "To initiate the process of CORC Issuance, a CO2 Removal Supplier with a certified Production Facility sends an Output Report to the Issuing Body based on an annual basis as described in the Monitoring Plan."

13) Carbon credits that are issued ex-ante are not CCP eligible. If your organisation supports both ex-ante and ex-post issuance, confirm it has procedures in place to transparently identify units that are issued ex- post and are thus eligible under the ICVCM.

Yes

Ex-ante and ex-post credit identification procedures URL:

N/A

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We only issue ex-post credits once the removal has occurred.

4.1 Robust Independent Third-Party Validation and Verification

In addition to CORSIA requirements, in relation to validation of mitigation activities and verification of GHG emission reductions and removals, confirm your organisation:

1) requires VVBs to be accredited by a recognised international accreditation standard (e.g., according to the current edition of ISO 14065 and ISO 14066, or per rules relating to the UNFCCC Kyoto Protocol Clean Development Mechanism or Paris Agreement Article 6, paragraph 4 Supervisory Body).

Yes

VVB accreditation requirements URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Validation%20&%20Verification%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the Puro Standard requires independent, external accreditation process which provides assurance that audits are being carried out consistently according to ISO Standard requirements, industry best practices, and necessary Codes of Conduct for independent 3rd party auditors.

As stated in the [Validation and Verification Requirements](#):

“Section 2. Accreditation Validation and Verification Bodies (VVBs) conducting independent third-party audits to Puro Standard carbon removal crediting program shall be accredited. VVBs shall obtain their accreditation from:

- 1 . International Accreditation Forum (IAF) member according to the ISO 14065 (General Principles and Requirements for Bodies Validating and Verifying Environmental Information) or ISO 14066 (Greenhouse Gases) or other relevant ISO Standard;
- 2 . United Nations UNFCCC4 CDM Executive Board according to the CDM Accreditation Standard for Designated Operational Entities, or by a new relevant accreditation system under the UNFCCC;
3. National or international emission allowance/reduction program; or,
- 6 . Other relevant accreditation system. The accreditation shall be current during the validation and verification process, as well as during the period of submission of the final audit report.”

2) has a process for managing VVB performance, including systematic review of validation and verification activities, reports and remedial measures to address performance issues including measures to ensure that poor VVB performance is reported to the relevant accreditation body, and provisions to suspend or revoke the participation of a VVB in the program.

Yes

VVB management policy/process URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Validation%20&%20Verification%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the Puro.earth [Validation & Verification Requirements](#), under:

"5. Oversight

All Validation and Verification Bodies (VVBs) shall be witnessed every 5 years to ensure quality, consistency, and integrity of the audits being conducted. The witness audits may be carried out internally by the accredited VVB with oversight of the witness audit program by the VVB's accreditation body. Puro.earth has the right to attend Audits.

Verification and validation audit reports shall receive a quality check by Puro.earth prior to the issuance of CORCs. Records of quality checks shall be retained in the project file for all projects. In the event of any observed deficiencies, the report will be returned to the auditor for correction and/or clarification. CORCs shall not be issued until the quality of the report has been deemed satisfactory.

In the event of repeat quality issues within the report or any other aspect of the 3rd party audit, Puro.earth will suspend or revoke the Lead Auditor or VVB from the approved auditor list. Decisions on suspension or revocation are at the sole discretion of Puro.earth. Depending on the nature and severity of the quality issues, any revocation of a Lead Auditor or VVB from the approved auditor list may not be permanent and a pathway to reinstatement may be provided. Any decision to suspend or revoke a Lead Auditor from the approved auditor list may be appealed."

B – Emissions Impact

5.1 Methodology Approval Process - CORSIA

CORSIA requirements related to Clear Methodologies and Protocols and their Development Process:

1) Confirm that your programme has qualification, quantification methodologies, and protocols in place, available for use, and are publicly disclosed.

Yes

Qualification, quantification, and protocol disclosure URL:

<https://puro.earth/methodologies/>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Each methodology has qualification and quantification and is publicly disclosed here:
<https://puro.earth/methodologies/>

Biochar (weblink [Puro.earth Biochar Methodology.pdf \(hubspotusercontent-na1.net\)](#)):

Biomass or biowaste heated in the absence of oxygen (a thermochemical conversion named pyrolysis). A very stable, solid form of carbon that can endure in soil for hundreds or thousands of years. Multiple uses at potentially industrial volumes, for example, as greenhouse additive, in soil regeneration and in stormwater or wastewater treatment.

1 **Carbonated Materials** (weblink [Puro.earth Carbonated Materials Methodology.pdf \(hubspotusercontent-na1.net\)](#)):

By reacting with CO₂, these materials mineralize and form carbonates, thereby trapping and storing the carbon dioxide for geological timespans. Offering a pathway to transform the environmental impact of an entire industry while utilizing industrial byproducts and waste materials such as steel slag mine tailings and alkaline waters.

2 **Enhanced Rock Weathering** (weblink [Puro.earth Enhanced Rock Weathering Methodology.pdf \(hubspotusercontent-na1.net\)](#)):

A process that accelerates natural rock weathering that usually takes thousands of years. Rock weathering begins with the reaction between water, carbon dioxide and silicate rocks which breaks down the rock to then form biocarbonates, a durable form of carbon. When spread on agricultural land, the rock can be highly beneficial and can increase crop yields.

3 **Geologically Stored Carbon** (weblink [Puro.earth Geologically Stored Carbon Methodology.pdf \(hubspotusercontent-na1.net\)](#)):

Carbon capture processes such as Direct Air Capture (DAC) and Bio-energy Carbon Capture Storage (BECCS) with geological storage, such as direct injection of CO₂ into deep geological formations. Puro.earth methodology only allows the capture of CO₂ directly from the air or from biogenic sources, not from fossil fuels. A highly scalable and permanent carbon removal pathway.

Terrestrial Storage of Biomass (weblink [Puro.earth Terrestrial Storage of Biomass Methodology.pdf \(hubspotusercontent-na1.net\)](#)):

The storage of woody biomass in conditions that prevent decomposition and maintain carbon locked away for at least 100 years. A new innovative approach to immobilize carbon, that offers a unique opportunity for large-scale, affordable carbon removal.

We are currently developing a methodology on Ocean-storage of biomass: <https://carbon.puro.earth/blog/our-blog/Ocean-Storage-of-Biomass-Puro-Standard-launches-methodology-working-group>

2) Summarize the programme's process for developing further methodologies and protocols, including the timing and process for revision of existing methodologies.

Methodology Development Outline

The methodologies are developed with a working group of key individuals and scientific experts, and at least two project proponents looking to operationalize the approach. In practice, the working

group critiques and discusses specific areas of the removal method to form a consensus on areas of scientific uncertainty w.r.t measurement and quantification as well as any key environmental or reversibility concerns.

In parallel with the development process, which generally takes around six months, the methodology draft is also independently reviewed by the independent external Advisory Board to ensure that the key concerns and uncertainties have been addressed and the approach is ready to be operationalized.

Once complete, the draft methodology is shared publicly for feedback and critique following the Stakeholder Engagement Requirements.

Much of the feedback has usually come from scientists and other experts actors wishing to make sure any critical details have not been missed, which has proven very useful in the past. As part of this process, a presentation or a webinar about the methodology will also be organised, targeted at informing the public on what's going on.

According to Puro Standard General Rules (rule 1.3, page 2) all new methodologies require a final approval from the Advisory Board before they can be operationalized, and the same applies to any major revisions to existing methodologies.

Summary of development of methodologies and protocols approach URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro_%20Method_Dev_Req.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The program's process for developing methodologies is described in the [Puro Methodology Development Requirements](#).

For new methodology development the request is introduced to the Issuing Body by a member of the Puro.earth or a member of the Advisory Board. Puro.earth then conducts a review by the science team to determine if the methodology is eligible for certification with the guiding principle that methodologies haven a science-based quantification of climate impact and ensure safety to people and environment. If the methodology is eligible then a working group is set up a draft methodology issued for consultation.

Once the public consultation is complete the methodology will go to the Advisory Board for approval.

The whole document, Methodology Development Requirements, is relevant, and describes the steps to be taken for public consultation and approval by the Advisory Board.

Approved Methodologies shall be reviewed every two years or earlier, as needed. The revision cadence is stated in clause 2.2.1 of the Puro Methodology Development

Requirements, "Approved Methodologies shall be reviewed every two years or earlier, as needed"

3) Provide evidence of the public availability of the programme's process for developing further methodologies and protocols.

Development of methodologies and protocols process URL:

[https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro %20Method Dev Req.pdf](https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro_%20Method_Dev_Req.pdf)

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The process for developing new methodologies into Puro Standard is described in chapter 2.1 of the Puro Methodology Development Requirements as described as follows:

2.1. New Methodology development

2.1.1. A new Methodology idea is introduced to Issuing Body by Puro staff or a member of the Advisory Board.

2.1.2. The Issuing Body conducts a science review and prepare the first Methodology draft according to requirements in section 1.3 and 1.4 in this document.

2.1.3. The Issuing Body invites stakeholders to participate in a working group and to review the draft and develop it collaboratively into a consultation Methodology draft.

2.1.4. The Issuing Body conducts public consultation on the consultation Methodology draft according to Stakeholder Engagement Requirements [7].

2.1.5. Public Consultation feedback is collected, addressed, and made publicly available in Puro.earth website.

2.1.6. The Issuing Body prepares a final draft of the Methodology incorporating the feedback and submits it to the independent Advisory Board for approval.

2.1.7. The Advisory Board shall accept or reject the Methodology according to the Terms of Reference [2].

2.1.8. The approved Methodology will be published on the Puro.earth website and made available in the document library.

4) Confirm that procedures are in place to ensure that emissions units are based on accurate measurements and valid quantification methods/protocols.

Emissions units based on accurate measurements and valid quantification methods/protocols URL:

N/a

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

N/a

5) Confirm that procedures are in place to ensure that monitoring, measuring, and reporting of both activities and the resulting mitigation is conducted at specified intervals throughout the duration of the crediting period.

Procedures for monitoring, measuring, and reporting of both activities and the resulting mitigation URL:

N/a

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

N/a

5.1 Methodology Approval Process

In addition to CORSIA requirements related to Clear Methodologies and Protocols and their Development Process:

a) Please confirm that your organisation has a process for developing and adopting updates to existing quantification methodologies.

Yes

Quantification methodology update policy/process URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro_%20Method_Dev_Req.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Approved Methodologies shall be reviewed every two years or earlier, as needed. The revision cadence is stated in clause 2.2.1 of the Puro Methodology Development Requirements, "Approved Methodologies shall be reviewed every two years or earlier, as needed"

b) Confirm your organisation's approved methodologies or general carbon-crediting program provisions address the following essential components:

1) applicability or eligibility criteria. 2) determination of the accounting boundary. 3) determination of additionality (to the extent this is not covered in other general carbon crediting program provisions). 4) establishing the baseline scenario. 5) quantification of GHG emission reductions or removals. 6) monitoring practices.

Yes

Methodology provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro_%20Method_Dev_Req.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, in clause 1.4.2. of the Methodology Development Requirements:

The Methodology shall address the following components as defined in Puro Standard General Rules:

- i. Applicability or eligibility criteria of the Puro Standard and those specific to the CO2 removal process.
- ii. Determination of the accounting boundary and quantification of Greenhouse Gas (GHG) removals and emissions.

- iii. Determination of the baseline scenario.
- iv. Determination of additionality.
- v. Determination of leakage.
- vi. Expectation of storage duration (i.e., permanence) and risks of reversals.
- vii. Definition of uncertainty in calculations and assumptions.
- viii. Environmental and social safeguards.
- ix. Determination of positive Sustainable Development Goals (SDG) impacts
- x. Monitoring practices, roles, and responsibilities.

c) Confirm that your organisation requires that, prior to approval, new methodologies and major revisions of existing methodologies undergo review by a group of independent experts and a public stakeholder consultation.

Yes

Methodology approval policy/process URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v4.0 the requirements to update Methodologies requires review by independent experts and public stakeholder consultation, in clause 1.3.4, "Should the review result in material revisions and/or new Methodologies, they shall be sent to public consultation before approval. Public consultation is announced on the Puro.earth website and to ecosystem members via a newsletter. Stakeholder comments are considered, and consultation results are published on the same website."

Also in the General rules v4.0, all methodologies need to be approved by the Advisory Board comprised of independent experts in voluntary and compliance carbon markets, clause 1.3.2, "The Advisory Board comprises at least three members and a maximum of seven all of whom are independent experts with a vantage point to the developments in the Compliance and Voluntary Carbon Markets".

The General Rules also refers to the Methodology Development Requirements, where Clauses

2.1.3 and 2.1.4 in in the Methodology Development Requirements states:

213. The Issuing Body invites stakeholders to participate in a working group and to review the draft and develop it collaboratively into a consultation Methodology draft.

214. The Issuing Body conducts public consultation on the consultation Methodology draft according to Stakeholder Engagement Requirements.

Pages 5-7 in the [Stakeholder Engagement Requirements](#) define the procedures of conducting a public consultation. Open and closed public consultations are available in Puro Standard Document library <https://puro.earth/public-consultation/>

d) Confirm that your organisation has procedures to review, suspend and/or withdraw the use of methodologies where the carbon-crediting program has determined, based on evidence, that GHG emission reductions or removals are being overestimated or that additionality might not be ensured.

Yes

Methodology review/suspension policy/process URL:

[https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro %20Method Dev Req.pdf](https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro_%20Method_Dev_Req.pdf)

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In Clause 2.2.1. -2.2.9 in the Methodology Development Requirements state:

2.2.1 Approved Methodologies shall be reviewed every two years or earlier, as needed.

2.2.7 The Advisory Board shall accept or reject the revised Methodology according to the Terms of Reference

2.2.8 The Advisory Board shall discontinue a methodology if it cannot be revised to meet the requirements set in sections 1.3 and 1.4 of this document. The discontinued methodology will be announced and made public on the Puro.earth website.

2.2.9. The approved revised Methodology will be published on the Puro.earth website and made available in the document library.

5.2 Requirements for Quantifying GHG Emission Reductions or Removals - CORSIA

Please respond to each question below.

1) Confirm that procedures are in place to issue carbon credits against realistic, defensible, and conservative baseline estimations of emissions.

Yes

URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Additionality%20Assessment%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, as established in the "Additionality Assessment Requirements", CO 2 Removal Suppliers shall report the CO2 removals delivered against a baseline which represents a conservative scenario for what would likely

have happened without carbon finance (the "counterfactual" baseline). The Puro Standard only credits carbon removals from the atmosphere and not emissions reductions or avoidance, therefore only the removals that are "additional" from the baseline are credited. CO2 Removal Suppliers can be guided by the

CDM Methodological Tool 02 "Combined tool to identify the baseline scenario and demonstrate additionality. Version 5.0" (<https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-02-v7.0.pdf>) to conduct the baseline determination.

2) Confirm that procedures are in place to publicly disclose baselines and underlying assumptions.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, as established in clause 2.3.3.4 of the General Rules, the Production Facility documentation is made public in the Registry and this includes, among others: “e. Baseline and Additionality Assessment Report.”

3) Confirm that procedures are in place to ensure that methods of developing baselines, including modelling, benchmarking or the use of historical data, use assumptions, methodologies, and values do not over-estimate mitigation from an activity.

Yes

URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Additionality%20Assessment%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the baseline is project specific, and it’s assessed every 5 years for the renewal of the crediting period. The programme requirements ensure not to overestimate the baseline carbon removal to secure storage. As stated in the Additionality Assessment Requirements page 1: “...to report the CO₂ removals delivered against a baseline which represents a conservative scenario for what would likely have happened without carbon finance (the “counterfactual” baseline)”.

4) Confirm that procedures are in place for activities to respond, as appropriate, to changing baseline conditions that were not expected at the time of registration.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the baseline is project specific, and it’s assessed every 5 years for the renewal of the crediting period. All changes to the baseline will be incorporated at that time. CO₂ Removal Suppliers are required to use conservative assumptions and to estimate uncertainty (Clause 6.3 General Rules) and as part of the

baseline conditions

shall be reported and adjusted.

Production Facility Audit revisit baseline and additionality every 5 years:

“2.4.1 The first date of the first Monitoring Period marks the beginning of a Crediting Period. The Crediting Period lasts 5 years unless otherwise stated in the applicable Methodology. The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit...”

“2.2.4.2 The minimum Production Facility Audit documentation includes the following documentation ...vi. Additionality Assessment Report ...”

Activities are asked to renew their response with any changes to the baseline in the Baseline and Additionality Assessment template and stated as follows: “Define and quantify all reasonable baseline alternatives to the proposed project activity to remove carbon with carbon financing. A baseline is a scenario that reasonably represents the natural and anthropogenic carbon removals to a permanent storage (storage durability over 100 years) in the absence of the carbon removal activity proposed by the CO2 Removal Supplier ...”

Weblink: [Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf)

Weblink to template: [Puro.earth Baseline and Additionality Assessment.docx \(live.com\)](https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf)

5) List all emissions sectors (if possible, activity types) supported by your program that present a potential risk of material emissions leakage:

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

All Puro Methodologies present a risk of potential emissions leakage and contain specific provisions and obligations on how to calculate them, mitigate them and deduct what is not avoidable from the total credit issuance calculation. This requirement is under clause 6.2.8 “Methodologies in the Puro Standard shall consider net Leakage effects which may occur in the situation where, for a single Leakage effect (e.g. energy-related activity shifting), the Leakage effect is associated with both an increase and decrease in emissions. In that case, the net effect shall be considered and result in either positive or negative Leakage. Only net negative Leakage effects shall be included in the quantification of CORCs, i.e. leading to a reduction in the amount of CORCs that can be claimed. Net positive Leakage effects are dismissed from the quantification of CORCs but may be presented as co-benefits.”

6) Confirm that measures are in place to assess incidences of material leakage of emissions that may result from the implementation of a mitigation activity.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme has provisions in place at the Methodology level to identify, mitigate, and account for unmitigated leakage. These provisions are covered in detail in section 6.2 of the General Rules which in summary establishes an obligation to the CO₂ Removal Supplier to evaluate leakage (clause 6.2.2. that

states “Leakage is the concept of an increase or decrease in greenhouse gas emissions or removals, outside of the system boundaries of the activity”), including all its potential sources and developing a plan to avoid, minimize and mitigate leakage. What cannot be avoided or mitigated, must be deducted from the credit issuance calculation as stated in clause 6.2.8. “Methodologies in the Puro Standard shall consider net Leakage effects which may occur in the situation where, for a single Leakage effect (e.g. energy-related activity shifting), the Leakage effect is associated with both an increase and decrease in emissions. In that case, the net effect shall be considered and result in either positive or negative Leakage. Only net negative Leakage effects shall be included in the quantification of CORCs, i.e. leading to a reduction in the amount of CORCs that can be claimed. Net positive Leakage effects are dismissed from the quantification of CORCs but may be presented as co-benefits.”

7) Confirm that provisions are in place to mitigate the risk of material leakage from activities that pose a risk of leakage when implemented at the project, national, or on an interim basis on a subnational level.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme requires provisions to identify and mitigate leakage based on the context of implementation of the Methodologies. These potential scenarios are covered in clauses 6.2.1 and 6.2.4 of the General Rules. The text:

6.2.1. “The CO₂ Removal Supplier must evaluate leakage following the requirements defined in the applicable Methodology.”

and,

6.2.4. “Methodologies in the Puro Standard shall then have requirements designed to avoid, minimize, or mitigate the effects of Leakage.”

8) Confirm that procedures are in place requiring activities to monitor identified material leakage.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, clause 6.2.8 of the General Rules establishes an obligation to include the leakage calculation into the verification framework, and the leakage that is observed must be deducted from the total credit issuance. The relevant text is as follows: "Methodologies in the Puro Standard shall consider net Leakage effects which may occur in the situation where, for a single Leakage effect (e.g. energy-related activity shifting), the Leakage effect is associated with both an increase and decrease in emissions. In that case, the net effect shall be considered and result in either positive or negative Leakage. Only net negative Leakage effects shall be included in the quantification of CORCs, i.e. leading to a reduction in the amount of CORCs that can be claimed."

9) Confirm that procedures are in place requiring activities to deduct emissions from any identified material leakage that reduces mitigation benefits.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, in General Rules clause 6.2.8 establishes that "net negative leakage effects shall be included in the quantification of CORCs, i.e. leading to a reduction in the amount of CORCs that can be claimed."

5.2 Requirements for Quantifying GHG Emission Reductions or Removals

a) In addition to CORSIA requirements*, confirm that your organisation does:

***CORSIA "Eligibility Criterion", "Carbon offset credits must be based on a realistic and credible baseline" and "Carbon offset credits must be quantified, monitored, reported and verified"**

1) clearly define a carbon credit as one metric tonne of CO2 equivalent of GHG emission reductions or removals.

Yes

Carbon Credit definition URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, a CORC (emission unit) is defined in the following way in the General Rules v.4.0, Definitions section page 21:

“CO2 Removal Certificate (CORC) - CO2 Removal Certificate is an electronic document, which records the Attributes of CO2 Removal issued to certified Production Facilities. Each CORC represents a Net Carbon Dioxide Removal volume of one (1) metric ton of Long-Term CO2 Removal.”

2) disclose the global warming potential (GWP) values used to calculate the CO2 equivalence.

Yes

GWP values used URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, in the Definitions section (page 22) of the General Rules v.4.0:

“GWP100 – Global Warming Potential (GWP) is a metric used to compare the potential warming effect of different greenhouse gases emitted to the atmosphere over a given time horizon. GWPs are commonly given for 20-year, 100-year and 500-year time horizons 11. In life cycle assessment, GWPs can be used to calculate the climate impact of a system expressed in carbon dioxide equivalent (CO2-eq). These values have been updated in different iterations of the IPCC assessment report and care must be taken in defining which version is being used.”

3) define the length of crediting periods, including the total length of combined crediting periods.

Yes

Definition for length of crediting periods URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, as established in the following clause of the General Rules v.4.0:

“2.4.1 The first date of the first Monitoring Period marks the beginning of a Crediting Period. The Crediting Period lasts 5 years unless otherwise stated in the applicable Methodology. The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit. The Crediting Period shall not overlap with another Crediting Period.”

4) provide guidance on steps and requirements for renewal of the crediting periods. Any renewal of the crediting period shall include a reassessment of the baseline scenario, including whether the conditions and barriers at the start of the mitigation activity still prevail, and an update of relevant parameters used to calculate emissions reductions and removals.

Yes

Guidance on crediting period renewal URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, as established in clause 2.4.1 of the General Rules v.4.0:

“The Crediting Period can be renewed twice by successfully undergoing a new Production Facility Audit”. A new Production Facility Audit implies new and updated baseline and additionality calculations.

Activities are asked to renew their response with any changes to the baseline in the [Baseline and Additionality Assessment template](#) and stated as follows: “Define and quantify all reasonable baseline alternatives to the proposed project activity to remove carbon with carbon financing. A baseline is a scenario that reasonably represents the natural and anthropogenic carbon removals to a permanent storage (storage durability over 100 years) in the absence of the carbon removal activity proposed by the CO2 Removal Supplier ...”

5) assess the overall uncertainty of emission reductions or removals associated with an activity type and/or require that the mitigation activity proponent assess the overall uncertainty in accordance with an approved methodology. In estimating overall uncertainty all causes of uncertainty shall be considered, including assumptions (e.g., baseline scenario), estimation equations or models, parameters (e.g., representativeness of default values), and measurements (e.g., the accuracy of measurement methods). The overall uncertainty shall be assessed as the combined uncertainty from individual causes.

Yes

Assessment of uncertainty URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, as established in Clause 6.3 of the General Rules v4.0:

“6.3 UNCERTAINTY AND CONSERVATIVENESS

6.3.1 The CO2 Removal Supplier must use conservative assumptions, values, and procedures to ensure that the CO2 Removal issued as CORCs is not overstated.

6.3.2 The CO2 Removal Supplier shall estimate uncertainty following the requirements defined in the applicable Methodology. The uncertainty estimation shall address all material sources of uncertainty specified in the applicable Methodology.

6.3.3 Methodologies in the Puro Standard shall include requirements on the identification and reporting of material sources of uncertainty.

6.3.4 Methodologies in the Puro Standard shall identify common material sources of uncertainty relevant for the CO2 Removal pathways included in the scope of the Methodology.

6.3.5 Methodologies in the Puro Standard shall consider all relevant material sources of uncertainty. For example, such uncertainties might arise from: i. Assumptions (e.g., baseline scenario). ii. Estimation equations or models. iii. Parameters (e.g., representativeness of

default values). iv. Measurements (e.g., the accuracy of measurement methods). v. Other factors which may have a material effect on the CO2 Removal quantification.

636 Methodologies in the Puro Standard shall include requirements and guidelines on the assessment and documentation of uncertainty in accordance with the following guidelines: i. The direct quantification of uncertainties (e.g. via statistical methods or calibration records) is preferred where feasible. Uncertainty estimations from external sources (such as peer-reviewed scientific literature or local regulations) may be utilized when necessary. ii. The methods utilized to quantify uncertainty in the Puro Standard Methodologies shall be conservative and scientifically justifiable.”

6) have a systematic approach to ensuring the conservativeness of quantification methodologies it approves for use.

Yes

Conservativeness provisions/processes URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The approach on uncertainty and conservativeness are included in the General Rules v.4.0 where under clause 6.3.2 it states that the requirements are specific to the Methodology addressing the carbon dioxide removal activity. In addition, clause 6.3.5 lists all relevant sources of uncertainty to consider. The complete text of 6.3 Uncertainty and Conservativeness is as follows:

631 The CO2 Removal Supplier must use conservative assumptions, values, and procedures to ensure that the CO2 Removal issued as CORCs is not overstated.

632 The CO2 Removal Supplier shall estimate uncertainty following the requirements defined in the applicable Methodology. The uncertainty estimation shall address all material sources of uncertainty specified in the applicable Methodology.

633 Methodologies in the Puro Standard shall include requirements on the identification and reporting of material sources of uncertainty.

634 Methodologies in the Puro Standard shall identify common material sources of uncertainty relevant for the CO2 Removal pathways included in the scope of the Methodology.

635 Methodologies in the Puro Standard shall consider all relevant material sources of uncertainty. For example, such uncertainties might arise from:

- i. Assumptions (e.g., baseline scenario).
- ii. Estimation equations or models.
- iii. Parameters (e.g., representativeness of default values).
- iv. Measurements (e.g., the accuracy of measurement methods).
- v. Other factors which may have a material effect on the CO2 Removal quantification.

636 Methodologies in the Puro Standard shall include requirements and guidelines on the assessment and documentation of uncertainty in accordance with the following guidelines:

- i. The direct quantification of uncertainties (e.g. via statistical methods or calibration records) is preferred where feasible. Uncertainty estimations from external sources (such as peer-

reviewed scientific literature or local regulations) may be utilized when necessary.

ii. The methods utilized to quantify uncertainty in the Puro Standard Methodologies shall be conservative and scientifically justifiable.

7) require in its program documents that existing government policies and legal requirements that lower GHG emissions (e.g., feed-in tariffs for renewable energy, minimum product efficiency standards, air quality requirements, or carbon taxes) be included when determining the baseline emissions. Your organisation may have provisions to consider the level of enforcement of such policies and legal requirements as well as any associated grace periods.

Yes

Policy and legal provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme has requirements to assess additionality when determining baseline emissions, established in section 6.5 of the General Rules v4.0, section 6.5:

6.5 ADDITIONALITY

65.1 A CO2 Removal Supplier must demonstrate that the project is not required by existing laws, regulations, or other binding obligations.

65.2 A CO2 Removal Supplier shall demonstrate CO2 additionality to the Baseline, meaning that it is resulting in higher volumes of CO2 removals than the likely Baseline alternatives. The Baseline shall be project-specific, conservative, and updated for every renewal of a Crediting Period.

65.3 A CO2 Removal Supplier shall demonstrate financial additionality, meaning that the project must convincingly show that the CO2 removals are a result of carbon finance.

65.4 To demonstrate additionality, a CO2 removal Supplier shall follow Puro.earth Additionality Assessment Requirements.

65.5 The Puro Standard may develop standardized approaches to facilitate the determination of a Baseline and additionality. The standardized approach must follow the process of developing standardized approaches as defined in the Core Carbon Principles⁶. Production Facilities meeting the criteria of the standardized approach are allowed to use it to demonstrate additionality."

5.3 Ex-Post Determination of Emission Reductions or Removals

Please respond to each question below.

a) Carbon credits that are issued ex-ante are not CCP eligible. If your organisation supports both ex-ante and ex-post issuance, confirm it has procedures in place to transparently identify units that are issued ex- post and are thus eligible under the ICVCM.

Yes

Ex-ante and ex-post credit identification procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro.earth only issues CO2 removal credits (CORCs) after the CO2 removal has occurred. In the General Rules v4.0, clause 3.2.2, "CORCs are always issued based on an Output Audit Report for a specified Monitoring Period for a certified Production Facility quantifying the Net CO2 Removal. The CO2 removal and the greenhouse gas emissions are quantified using the rules defined in the corresponding Methodology."

6.1 No Double Issuance (Double Registration)

a) **Confirm your organisation has provisions in place to:**

1) **prevent the registration of any mitigation activity that has been registered under another carbon-crediting program and is still active under that program; and**

Yes

No double registration procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, we prevent registration of any CO2 removal activity under another carbon-crediting program, as established in the General Rules v4.0, clauses:

3.5.3 Preventing double registration outside of the Registry.

3.5.3.1 The Issuing Body shall control that the same Account Holder has not registered the same CO2 Removal activity for the same period with another carbon-crediting program. The same CO2 Removal activity can register with another carbon crediting program for a different Monitoring period. 3.5.3.2 The Registry requires submitting of prior registrations of the same CO2 Removal activity with other crediting programs. The CO2 Removal Supplier registering a CO2 Removal activity shall clearly state if the same activity has been registered with another carbon-crediting program for another Monitoring period. The CO2 Removal Supplier shall also state if it has applied to be registered with another carbon-crediting program but has been rejected and the reason for rejection.

3.5.3.3 In the case of a CO2 Removal activity transferring from another crediting program to the Registry, the Monitoring period shall not overlap. The CO2 Removal Supplier shall provide the document of deregistration from the other carbon-crediting program stating from which date the CO2 Removal activity is no longer credited under the other carbon-crediting program. The CO2 Removal Output produced after the date of registration in the Registry and the corresponding Monitoring period shall be credited under the Puro Standard. 3.5.3.4 When the CO2 Removal activity is deregistered from the Registry, and transfer to another

carbon-crediting program, the CO2 Removal Supplier shall receive a document of deregistration from the Registry stating from which date the CO2 Removal activity is no longer certified under the Puro Standard.

2) ensure that it does not issue carbon credits for GHG emission reductions or removals where another program has issued credits to the same mitigation activity and/or for the same GHG emission reductions or removals and has not cancelled those credits for the purpose of avoiding double issuance.

Yes

No double issuance procedures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, we ensure that there is no double issuance established in the following clauses of the General Rules v4.0:

“3.5.3.1 The Issuing Body shall control that the same Account Holder has not registered the same CO2 Removal activity for the same period with another carbon-crediting program. The same CO2 Removal activity can register with another carbon crediting program for a different Monitoring period.

3532 The Registry requires submitting of prior registrations of the same CO2 Removal activity with other crediting programs. The CO2 Removal Supplier registering a CO2 Removal activity shall clearly state if the same activity has been registered with another carbon-crediting program for another Monitoring period. The CO2 Removal Supplier shall also state if it has applied to be registered with another carbon-crediting program but has been rejected and the reason for rejection.

3533 In the case of a CO2 Removal activity transferring from another crediting program to the Registry, the Monitoring period shall not overlap. The CO2 Removal Supplier shall provide the document of deregistration from the other carbon-crediting program stating from which date the CO2 Removal activity is no longer credited under the other carbon-crediting program. The CO2 Removal Output produced after the date of registration in the Registry and the corresponding Monitoring period shall be credited under the Puro Standard.

3534 When the CO2 Removal activity is deregistered from the Registry, and transfer to another carbon crediting program, the CO2 Removal Supplier shall receive a document of deregistration from the Registry stating from which date the CO2 Removal activity is no longer certified under the Puro Standard.”

6.2 No Double Use

Please respond to each question below.

a) Confirm your organisation has registry provisions that prevent the further transfer, retirement or cancellation of a carbon credit once it has been cancelled or retired.

Yes

No Double Use provisions URL:

<https://7518557.fs1.hubspotusercontent->

na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, we have provisions to prevent double use, in the General Rules v4.0 where retirement is defined as “Retirement of a CORC from circulation by realizing its value and making the Beneficiary of the Retirement the sole owner of the CORC and its Attributes.”

Clause 3.5.5.1 establishes of the General Rules establishes:

“3.5.5.1 The CORCs are issued in the Registry, where the full lifecycle is tracked from Issuance to Retirement, ensuring avoidance of double Retirement and use. Each CORC is uniquely identified with a serial number, and the Retirements are published with Beneficiary and the Retirement purpose to align with the registry column title in the Registry. A CORC cannot be retired more than once in the Registry.”

Evidence that the CORC is retired is provided in the Puro Registry in both the Retirements and Project specific pages.

<https://registry.puro.earth/carbon-sequestration/retirements> <https://registry.puro.earth/carbon-sequestration/projects>

C - Sustainable Development

7.1 Assessment and Management of Environmental and Social Risks - CORSIA

CORSIA requirements related to Safeguards System and Sustainable Development criteria

1) Confirm that your programme has safeguards in place to address:

- environmental risks
- social risks

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes.

Section 6.4 of the General Rules is dedicated to Environmental and Social Safeguards.

Under the principle of no net harm (clause 6.4.1), the CO2 Removal Supplier shall provide documentation that shall robustly address all material environmental and social impacts that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with

the identified risks to minimize and address any negative environmental and/or social impacts. (clause 6.4.3).

In addition, environmental and social safeguards are incorporated from the outset in Puro's methodology development (General Rules, clause 1.3.5.1 Principles that guide methodology development). Environmental and social impacts and risks are key factors in deciding which activities are eligible under a methodology. The CO2 removal activities and therefore also methodologies vary significantly in terms of their impacts, risks, and regulatory contexts. For instance, the following includes references to the clauses inside each Methodology document:

1. In Geological Storage of Carbon (GSC), the permanence and safety of the storage are primary considerations necessitating a strict regulatory process for permitting. In such cases, Puro's methodology establishes minimum requirements for the national regulations. However, some carbon removal methodologies are more distributed in nature, potentially having minimal or no permitting requirements. In these instances, Puro deems it necessary to establish more detailed requirements for environmental and social safeguards. (Weblink to the Methodology: Puro.earth Geologically Stored Carbon Methodology.pdf (hubspotusercontent-na1.net)).
2. In Enhanced Rock Weathering (ERW) Methodology requires a comprehensive environmental risk assessment reviewed by a third party, and a comprehensive analysis of the weathering material (clauses 4.4, 4.5, 5.2 and 5.3). The suppliers must demonstrate and evidence that projects pose a minimal risk of any material negative impacts on the surrounding ecosystems or communities (clauses 5.1.3, 5.1.4). They are prohibited from operating on culturally sensitive land or causing community displacement (clause 5.1.2). In addition to Puro's general stakeholder engagement requirements, the ERW methodology specifically mandates communication about potential health risks (4.5.3). (Weblink to the Methodology: Enhanced Rock Weathering Methodology (hubspotusercontent-na1.net)).

3. In Terrestrial Storage of Biomass (TSB) Methodology, the requirements also include a third-party reviewed environmental risk assessment or environmental impact assessment with a list of requirements that are particularly relevant for that methodology (clauses 4.8.5-4.8.7). For TSB, there are also detailed requirements related to sustainable sourcing of biomass (clause 4.1.6). Both ERW and TSB include a requirement to demonstrate impacts on local communities (TSB clause 4.9.1, ERW clause 5.1.4). (Weblink to the Methodology: Terrestrial Storage of Biomass.pdf (hubspotusercontent-na1.net))
4. For the Biochar (BCR) Methodology, the focus has been on sustainable sourcing of biomass (5.2.1), in avoiding emissions of pollutants to air, water and soil (5.3.7), and in ensuring that the biochar is safe for its intended use (1.1.7). Similarly, Geologically Stored Carbon methodology has sustainability requirements for biomass (5.1.3), also highlighting the potential negative impacts to food safety due to land use competition (1.2.6). (Weblink to the Methodology: Puro.earth Biochar Methodology.pdf (hubspotusercontent-na1.net)).
5. For the Carbonated Materials (CMA) Methodology, the focus is described in clause 2.2.4 "The CO₂ Removal Supplier shall be able to demonstrate Environmental and Social Safeguards and that the Production Facility activities do no significant harm to the surrounding natural environment or local communities." (Weblink to the Methodology: Puro.earth Carbonated Materials Methodology.pdf (hubspotusercontent-na1.net))

The methodologies also include specific requirements for occupational health and safety, highlighting the most relevant issues for the respective methodology (4.5.4 in ERW, 4.9.3 in TSB, 1.1.8 in biochar).

2) Confirm that your program uses sustainable development criteria

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, and according to clause 6.6.1 of the General Rules "CO₂ Removal Suppliers shall provide qualitative descriptions of expected positive impacts on Sustainable Development Goals (SDG) before the Production Facility Audit."

3) Confirm that your program has provisions for monitoring, reporting and verification in accordance with these criteria

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The provisions for monitoring, reporting and verification are in clause 6.6.2 of the General Rules, "A CO₂ Removal Supplier shall provide qualitative and quantitative evidence of

positive impacts on SDGs for the Output Audit based on SDG Assessment Requirements provided by the Issuing Body.” (weblink

[Puro.earth_General-Rules_v.4.0.pdf \(hubspotusercontent-na1.net\)](#))

In addition, the SDG monitoring and reporting is an input for the certification process and it is listed as a required document for the Production Facility Audit under clause 2.2.4.2.ix Positive Sustainable Development Goals (SDG) impacts description.

Finally, the “SDG Assessment Requirements” is a Standard Requirement. This document includes the following parts:

- General principles of assessing positive impacts on SDGs • Validation and verification of positive impacts on SDGs
- Process for suggesting new project-level indicators for positive impacts on SDGs
- List of currently accepted project-level indicators for positive impacts and associated evidence requirements

And can be accessed via this weblink: [Puro_SDG_Assess_Req.pdf \(hubspotusercontent-na1.net\)](#)

7.1 Assessment and Management of Environmental and Social Risks

Please respond to each question below.

a) In addition to CORSIA requirements relating to Safeguards System and Sustainable Development Criteria, confirm your organisation requires mitigation activity proponents to:

1) abide by national and local laws, objectives, programs and regulations and where relevant, international conventions and agreements.

https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

Yes

Provisions to abide by national and local laws URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This requirement is included in the General Rules v.4.0, clause 6.4.1.1.i

“Abide by national and local laws, objectives, programs, and regulations and, where relevant, international conventions and agreements.”

2) assess associated risks of negative environmental and social impacts with regard to the safeguards contained in criteria 7.2 to 7.8 (inclusive), taking into account the scope and scale of the mitigation activity.

Yes

Assessment of negative environmental and social impacts policy/processes URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The General Rules v4.0, clause 6.4.3 and 6.4.3.1

“6.4.3 The CO2 Removal Supplier shall provide documentation, that shall robustly address all material environmental and social impacts, including aspects listed in 6.4.1.1, that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.

6.4.3.1 This shall be done through one or several of the following:

- i. Environmental Impact Assessment (EIA).
- ii. Environmental permit.
- iii. Other documentation, including methodology-specific documentation, approved by the Issuing Body on the analysis and management of the environmental and social impacts.”

As a practical tool we require that all CO2 Removal Suppliers respond to the [Environmental and Social Safeguards Questionnaire](#), which requires the CO2 Removal Supplier to disclose how environmental and social impacts and risks were assessed and asks about each point in General Rules v.4.0 clause 6.4.1.1 specifically.

3) ensures FPIC processes for IPs and LCs, where applicable; and conduct stakeholder consultations, including local stakeholders as part of project design and implementation in a manner that is inclusive, culturally appropriate, and respectful of local knowledge, take these consultations into account and respond to local stakeholders’ views.

Yes

FPIC IPs and LCs provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v4.0, clause 6.4.2 specifically requires FPIC process if indigenous people are impacted: “When the activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO2 Removal supplier shall develop the Production Facility with free, prior, informed consent (FPIC).”

For stakeholder consultation, General Rules v4.0, clause 6.4.4 sets the following requirement:

“The CO2 Removal Supplier shall conduct a stakeholder consultation according to regulation by local authorities or following the Puro Standard document Stakeholder Engagement Requirements. The CO2 Removal Supplier shall document the stakeholder consultation execution and its results following the Puro Standard document Stakeholder Engagement Requirements.”

The [Stakeholder Engagement Requirements](#) includes the following requirements: “1.4 In case the CO2 Removal Supplier has not conducted sufficient Stakeholder Engagement prior to application for approval under the Puro Standard, Stakeholder Engagement shall be conducted by independently organizing and hosting a public Stakeholder consultation in an appropriate format commonly used in the local community.” “5.5 The CO2 Removal

Supplier shall show frankness and readiness to address feedback not only in words but to initiate potential revisions to its project design, implementation, or operation. It is especially important that local and indigenous knowledge receives attention and becomes utilized.”

“5.6 The CO2 Removal Supplier shall provide justifications in case any feedback has not been incorporated or reacted to. Unjustified withholding of received feedback in the Output Report can result in the deregistration of the CO2 Removal Supplier from the Puro Registry.”

“6.1 Stakeholder Engagement shall be open to anyone interested in participating. The CO2 Removal Supplier shall ensure that Stakeholders listed in para 3.1 who express interest in or would likely want to participate in the Stakeholder consultation are not excluded.”

b) Where, pursuant to 7.1 a) 2), the mitigation activity proponents have assessed that the mitigation activity poses risks of negative environmental and/or social impacts with regard to any of criteria 7.2 -

7.8 (inclusive) confirm your organisation requires the mitigation activity proponents to:

1) include measures, commensurate with the identified risks, to minimise and address such negative environmental and/or social impacts, in validated design documents prior to registration.

Yes

Assessment of mitigation requirements URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause 2.2.4.2 includes Environmental and Social Safeguards in the Production Facility Audit documentation, which is published in the Puro registry once a successful Facility Audit is completed as stated in clause 2.2.5.5, “The Issuing Body publishes the project description, Production Facility Audit Report and Statement in the Registry.”

In the General Rules v4.0, clause 6.4.3 sets the requirements to “include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.”

As a practical tool we require that all CO2 Removal Suppliers respond to the [Environmental and Social Safeguards questionnaire](#), which requires CO2 Removal Suppliers to disclose whether they adhere to the requirements as well as their mitigation measures for identified impacts and risks.

2) include information on the measures implemented pursuant to 1), commensurate with the identified risks in the monitoring report.

Yes

Measures implemented commensurate with identified risks URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The General Rules v4.0, clause 6.4.3,

“6.4.3 The CO2 Removal Supplier shall provide documentation, that shall robustly address all material environmental and social impacts, including aspects listed in 6.4.1.1, that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.

7.2 Labour Rights and Working Conditions

Please respond to each question below.

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) provides safe and healthy working conditions for employees.

Yes

Health & safety policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This requirement is included in the General Rules v4.0, clause 6.4.1.1.iv “safe and healthy working conditions.”

2) provides fair treatment of all employees, avoiding discrimination and ensuring equal opportunities.

Yes

Fair treatment policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v4.0, clause 6.4.1.1.iv requires adhering to “fair treatment of employees”: “Providing for equal opportunities in the context of gender; providing equal pay for equal work and protecting against and appropriately responding to violence against women and girls.”

3) prohibits the use of forced labour, child labour, or trafficked persons, and protects contracted workers employed by third parties.

Measured to protect against forced/child/trafficked labour URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This requirement is included in the General Rules v4.0, clause 6.4.1.1.iv “Labor rights and working conditions, including prohibiting forced labor, child labor or trafficked persons whether in own operations or employed by third parties, fair treatment of employees, and safe and healthy working conditions.”

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes

Adherence to safeguards provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause 2.2.4.2 includes Environmental and Social Safeguards in the Production Facility Audit documentation, which is published in the Puro registry once a successful Facility Audit is completed as stated in clause 2.2.5.5, “The Issuing Body publishes the project description, Production Facility Audit Report and Statement in the Registry.”

General Rules rule 6.4.3 sets the requirements to “include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.”

As a practical tool we require that all CO2 Removal Suppliers respond to the [Environmental and Social Safeguards questionnaire](#), which requires CO2 Removal Suppliers to disclose whether they adhere to the requirements as well as their mitigation measures for identified impacts and risks.

7.3 Resource Efficiency and Pollution Prevention

Please respond to each question below.

a) Your organisation requires mitigation activity proponents to ensure that the mitigation activity minimises:

- 1. pollutant emissions to air**
- 2. pollutant discharges to water, noise and vibration**
- 3. generation of waste and release of hazardous materials, chemical pesticides and**

Yes

Pollution and hazardous materials policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is included in the General Rules, clause 6.4.1.1.vi “Pollution prevention, including pollutant emissions to air, water, and soil as well as noise and vibration, and generation of waste and release of hazardous materials, chemical pesticides, and fertilizers.”

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

- 1. whether the mitigation activity results in pollutant emissions to air, pollutant discharges to water, noise and vibration, the generation of waste, the release of hazardous materials, chemical pesticides and fertilisers.**
- 2. where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1).**

Yes

Resource Efficiency and Pollution Prevention policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause 2.2.4.2 includes Environmental and Social Safeguards in the Production Facility Audit documentation, which is published in the Puro registry once a successful Facility Audit is completed as stated in clause 2.2.5.5, “The Issuing Body publishes the project description, Production Facility Audit Report and Statement in the Registry.”

In the General Rules v4.0 clause 6.4.3 sets the requirements to “include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.”

This is implemented with the [Environmental and Social Safeguards questionnaire](#), which requires in pages 4 and 5 for the CO2 Removal Suppliers to disclose whether the carbon removal activity results in pollutant emissions to air, pollutant discharges to water, pollutant discharges to soil, noise and vibration, the generation of waste, the release of hazardous materials, and chemical pesticides and fertilizers. For each potential impact, CO2 Removal Suppliers are required to provide detailed information about its extent and the current measures in place to mitigate these negative impacts.

7.4 Land Acquisition and Involuntary Resettlement

Please respond to each question below.

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity avoids, or where this is not feasible, minimises forced physical and/or economic displacement.

Yes

Avoidance of forced physical and/or economic displacement policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.1.1.x “Avoiding forced physical and or economic displacement. If avoidance is not feasible, CO2 Removal Suppliers shall minimize physical and/or economic displacement. This applies also to any access restrictions to lands, territories, or resources, and any customary rights of local right holders.”

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

- 1. whether the mitigation activity results in forced physical and/or economic displacement.;**
- 2. where the mitigation activity results in the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1)**

Yes

Physical and Economic Displacement policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause 2.2.4.2 includes Environmental and Social Safeguards in the Production Facility Audit documentation, which is published in the Puro registry once a successful Facility Audit is completed as stated in clause 2.2.5.5, “The Issuing Body publishes the project description, Production Facility Audit Report and Statement in the Registry.”

The General Rules v4.0 clause 6.4.3 sets the requirements to “include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.”

This is implemented by the [Environmental and Social Safeguards questionnaire](#), which requires CO2 Removal Suppliers to disclose whether they adhere to the requirements. These questions are covered under social impact and community relations in pages 7 and 8.

7.5 Biodiversity Conservation

Please respond to each question below.

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) avoids, or where this is not feasible, minimises negative impacts on terrestrial and marine biodiversity and ecosystems.

Yes

Terrestrial and marine biodiversity mitigation policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.1.1.viii:

“Biodiversity conservation and sustainable management of natural resources, **including avoiding or minimizing negative impacts on terrestrial and marine biodiversity and ecosystems**; protecting the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity; minimizing soil degradation and soil erosion and minimizing water consumption and stress. The CO2 Removal Supplier shall not convert natural forests or high conservation value habitats.”

2) protects the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity.

Yes

Endangered species policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules, clause 6.4.1.1.viii

“Biodiversity conservation and sustainable management of natural resources, including avoiding or minimizing negative impacts on terrestrial and marine biodiversity and ecosystems; **protecting the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity**; minimizing soil degradation and soil erosion and minimizing water consumption and stress. The CO2 Removal Supplier shall not convert natural forests or high conservation value habitats.”

3) does not convert natural forests, grasslands, wetlands, or high conservation value habitats.

Yes

Preservation of high conservation value habitats policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.1.1.viii

“Biodiversity conservation and sustainable management of natural resources, including avoiding or minimizing negative impacts on terrestrial and marine biodiversity and ecosystems; protecting the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity; minimizing soil degradation and soil erosion and minimizing water consumption and stress. **The CO2 Removal Supplier shall not convert natural forests or high conservation value habitats.**”

4) minimises soil degradation and soil erosion.

Yes

Soil degradation and soil erosion policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.1.1.viii

“Biodiversity conservation and sustainable management of natural resources, including avoiding or minimizing negative impacts on terrestrial and marine biodiversity and ecosystems; protecting the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity; **minimizing soil degradation and soil erosion** and minimizing water consumption and stress. The CO2 Removal Supplier shall not convert natural forests or high conservation value habitats.”

5) minimises water consumption and stress in the mitigation activity.

Yes

Water conservation policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.1.1.viii:

“Biodiversity conservation and sustainable management of natural resources, including

avoiding or minimizing negative impacts on terrestrial and marine biodiversity and ecosystems; protecting the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity; minimizing soil degradation and soil erosion and **minimizing water consumption and stress**. The CO2 Removal Supplier shall not convert natural forests or high conservation value habitats.”

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents:

1. whether the mitigation activity has negative impacts on terrestrial and marine biodiversity and ecosystems, on habitats of rare, threatened, and endangered species, on soil degradation and soil erosion, and on water consumption and water stress.
2. where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1).

Yes

Biodiversity conservation and sustainable management of living natural resources policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause 2.2.4.2 includes Environmental and Social Safeguards in the Production Facility Audit documentation, which is published in the Puro registry once a successful Facility Audit is completed as stated in clause 2.2.5.5, “The Issuing Body publishes the project description, Production Facility Audit Report and Statement in the Registry.”

General Rules v4.0 clause 6.4.3 sets the requirements to “include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.”

This is implemented with the [Environmental and Social Safeguards questionnaire](#), which requires CO2 Removal Suppliers to disclose whether they adhere to the requirements. These questions are covered under Environmental impact and management in pages 5 and 6.

7.6 Indigenous Peoples, Local Communities and Cultural Heritage

Please respond to each question below.

a) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

- 1) recognises, respects and promotes the protection of the rights of IPs & LCs in line with applicable international human rights law, and the [United Nations Declaration on the Rights of Indigenous Peoples](#) and ILO Convention 169 on Indigenous and Tribal Peoples.

Yes

Protection of rights of IPs & LCs URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules, clause 6.4.1.1.iii “Recognize, respect, and promote the protection of the rights of IPs & LCs (indigenous peoples and local communities) in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and International Labor Organization (ILO) Convention 169 on Indigenous and Tribal Peoples.”

2) identifies the rights-holders possibly affected by the mitigation activity (including customary rights of local rights holders).

Yes

Identification of rights-holders provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is a core part of the FPIC process, which is required in the General Rules v4.0, clause 6.4.2: “When the activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO2 Removal supplier shall develop the Production Facility with free, prior, informed consent (FPIC).”

3) when relevant to circumstances, has applied the FPIC process.

Yes

FPIC process/policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules, clause 6.4.2:

“When the activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO2 Removal supplier shall develop the Production Facility with free, prior, informed consent (FPIC).”

4) does not force eviction or any physical or economic displacement of IPs & LCs, including through access restrictions to lands, territories, or resources, unless agreed upon with IPs & LCs during the FPIC process.

Prevention of eviction or economic displacement provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.2: "When the activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO2 Removal supplier shall develop the Production Facility with free, prior, informed consent (FPIC)"

In addition to the requirement specific to indigenous people, there is clause 6.4.1.1.x, which covers all communities: "Avoiding forced physical and or economic displacement. If avoidance is not feasible, CO2 Removal Suppliers shall minimize physical and/or economic displacement. This applies also to any access restrictions to lands, territories, or resources, and any customary rights of local right holders."

5) preserves and protects cultural heritage consistent with IPs & LCs protocols/rules/plans on the management of cultural heritage or UNESCO Cultural Heritage conventions.

Yes

Preservation of culture heritage provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in General Rules v4.0, clause 6.4.1.1.x: Preserves and protects cultural heritage and cultural and religious sites.

In addition to this clause, which covers all local communities, there is a specific requirement (clause 6.4.2 in the General Rules v4.0) for FPIC process for indigenous people in case the activity directly or indirectly impacts the cultural heritage of indigenous people:

6.4.2 When the activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO2 Removal supplier shall develop the Production Facility with free, prior, informed consent (FPIC).

b) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes

IPs & LCs provisions in design documents URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

General Rules v4.0, clause 6.4.3 sets the requirements to “include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.”

In the General Rules v.4.0, clause 2.2.4.2 includes Environmental and Social Safeguards in the Production Facility Audit documentation, which is published in the Puro registry once a successful Facility Audit is completed as stated in clause 2.2.5.5, “The Issuing Body publishes the project description, Production Facility Audit Report and Statement in the Registry.”

This is implemented with the [Environmental and Social Safeguards questionnaire](#), which requires CO2 Removal Suppliers to disclose whether they adhere to the requirements. These questions are covered under social impact and community relations in pages 7 to 9.

7.7 Respect for Human Rights, Stakeholder Engagement

Please respond to each question below.

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1) avoids discrimination and respects human rights.

Yes

Discrimination & human rights policy/provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.1.1.ii:

“Respect for human rights and avoiding discrimination; abiding by the International Bill of Human Rights and universal instruments ratified by the host country.”

2) abides by the [International Bill of Human Rights](#) and universal instruments ratified by the host country.

Yes

International Bill of Human Rights and host country provisions policy URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.1.1.ii:

“Respect for human rights and avoiding discrimination; **abiding by the International Bill of Human Rights and universal instruments ratified by the host country.**”

3) takes into account and responds to local stakeholders’ views.

Yes

Engagement and response to stakeholders approach URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier Documents/Stakeholder Engagement Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.4: “The CO2 Removal Supplier shall conduct a stakeholder consultation according to regulation by local authorities or following the Puro Standard document Stakeholder Engagement Requirements. The CO2 Removal Supplier shall document the stakeholder consultation execution and its results following the Puro Standard document Stakeholder Engagement Requirements.”

and in clause 6.4.5 “The CO2 Removal Supplier shall have a policy in place to allow stakeholders to submit continuous feedback throughout the operation of the Production Facility”

The [Stakeholder Engagement Requirements](#) defines in more detail, including e.g. the following rules:

5.5 The CO2 Removal Supplier shall show frankness and readiness to address feedback not only in words but to initiate potential revisions to its project design, implementation, or operation. It is especially important that local and indigenous knowledge receives attention and becomes utilized.

5.6 The CO2 Removal Supplier shall provide justifications in case any feedback has not been incorporated or reacted to. Unjustified withholding of received feedback in the Output Report can result in the deregistration of the CO2 Removal Supplier from the Puro Registry.

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards, or that it has put in place the measures referred to in 7.1 b) 1) above.

Yes

Design document measures URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause 2.2.4.2 includes Environmental and Social Safeguards in the Production Facility Audit documentation, which is published in the Puro registry once a successful Facility Audit is completed as stated in clause 2.2.5.5, "The Issuing Body publishes the project description, Production Facility Audit Report and Statement in the Registry."

General Rules v4.0, clause 6.4.3 sets the requirements to "include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts."

Avoiding discrimination and respecting human rights and abiding by the International Bill of Human Rights and universal instruments ratified by the host country are covered in the [Environmental and Social Safeguards questionnaire](#), which requires CO2 Removal Suppliers to disclose whether they adhere to the requirements. These questions are covered under General overview and compliance in page 2.

Considering and responding to local stakeholders' views is covered under the [Stakeholder Engagement Report](#).

7.8 Gender Equality

Please respond to each question below.

a) Confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

1. provides for equal opportunities in the context of gender
2. protects against and appropriately responds to violence against women and girls
3. provides equal pay for equal work

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.4.1.1.v: "Providing for equal opportunities in the context of gender; providing equal pay for equal work and protecting against and appropriately responding to violence against women and girls."

b) Confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes

Gender Equality policy/provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

na1.net/hubfs/7518557/General%20Rules/Puro.earth_General_Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

In the General Rules v.4.0, clause 2.2.4.2 includes Environmental and Social Safeguards in the Production Facility Audit documentation, which is published in the Puro registry once a successful Facility Audit is completed as stated in clause 2.2.5.5, "The Issuing Body publishes the project description, Production Facility Audit Report and Statement in the Registry."

General Rules v.4.0, clause 6.4.3 sets the requirements to "include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts."

This is implemented with the [Environmental and Social Safeguards questionnaire](#), which requires CO2 Removal Suppliers to disclose whether they adhere to the requirements. These questions are covered under **Labor practices and rights** on page 4.

7.9 Robust Benefit-Sharing

a) If your organisation requires arrangements for benefit-sharing with IPs & LCs, confirm that you require that mitigation activity proponents:

1) include in validated design documents information on how benefit-sharing arrangements that are appropriate to the context and consistent with applicable national rules and regulations will be designed and implemented through a benefit-sharing plan.

No

Benefit sharing proponent requirements URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Stakeholder%20Engagement%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We do not require benefit sharing.

Nonetheless, we require that co-benefits are reported and are explained within the stakeholder engagement process under section 2.4.1:

"Stakeholders shall be provided with general, non-technical information on the mitigation project to help them comprehend the design, implementation plan, and planned operation of the mitigation activity. This project description shall be accompanied by a detailed, understandable description of how the environmental, economic, and social effects - both potentially positive and negative - of the mitigation activity might affect their rights, interests, and traditional livelihoods."

2) confirm in validated design documents that the draft and final benefit-sharing plan have been shared with the affected IPs & LCs in a form, manner, and language understandable to them.

No

Benefit sharing dissemination requirements URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Stakeholder%20Engagement%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We do not require benefit sharing.

Nonetheless, we require that co-benefits are reported and are explained within the stakeholder engagement process under section 2.4.1:

"Stakeholders shall be provided with general, non-technical information on the mitigation project to help them comprehend the design, implementation plan, and planned operation of the mitigation activity. This project description shall be accompanied by a detailed, understandable description of how the environmental, economic, and social effects - both potentially positive and negative - of the mitigation activity might affect their rights, interests, and traditional livelihoods."

3) make benefit-sharing outcomes that result from the benefit-sharing plan publicly available, subject to applicable legal restrictions.

No

Benefit-Sharing results policy/provisions URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Stakeholder%20Engagement%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We do not require benefit sharing.

Nonetheless, we require that co-benefits are reported and are explained within the stakeholder engagement process under section 2.4.1:

"Stakeholders shall be provided with general, non-technical information on the mitigation project to help them comprehend the design, implementation plan, and planned operation of the mitigation activity. This project description shall be accompanied by a detailed, understandable description of how the environmental, economic, and social effects - both potentially positive and negative - of the mitigation activity might affect their rights, interests, and traditional livelihoods."

7.10 Cancun Safeguards

Please respond to each question below.

a) Confirm your organisation requires for all REDD+ mitigation activities that the mitigation activity is consistent with all relevant Cancun Safeguards as set out in paragraph 71 of [decision 1/CP.16 of the United Nations Framework Convention on Climate Change](#).

No

Cancun Safeguards policy/provisions URL:

N/A

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

We do not have REDD+ mitigation activities certified under the Puro Standard.

7.11 Ensuring Positive SDG Impacts

a) Confirm your organisation requires that mitigation activity proponents, in validated design documents:

1) provide information on how the mitigation activity is consistent with the SDG objectives of the host country, where the SDG objectives are relevant, and such is feasible.

Yes

Proponent SDG objectives policy/provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v.4.0, clause 6.6.3 "A CO2 Removal Supplier shall also provide information on how the mitigation activity is consistent with the SDG objectives of the host country, where the SDG objectives are relevant, and such is feasible."

This is required to be part of the validated design document in General Rules v.4.0, clause 2.2.4.2, which includes Positive Sustainable Development Goals (SDG) impacts description in the Production Facility Audit documentation, which is published in the Puro Registry.

2) demonstrate, if applicable, through qualitative assessment how the mitigation activity delivers positive SDG impacts for certain SDGs (excluding SDG 13), if any.

Yes

Requirement of proponent demonstration of positive SDGs provisions URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

This is required in the General Rules v4.0, clause 6.6.1: "A CO2 Removal Supplier shall provide qualitative descriptions of expected positive impacts on Sustainable Development Goals (SDG) before the Production Facility Audit."

3) provide information on any standardised tools and methods that were used to assess the SDG impacts.

Yes

Requirement of proponent methods provision URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier Documents/Puro_SDG_Assess_Req.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The requirement is in the General Rules v.4.0, clause 6.6.2: "A CO2 Removal Supplier shall provide qualitative and quantitative evidence of positive impacts on SDGs for the Output Audit based on SDG Assessment Requirements provided by the Issuing Body."

The program requires that the CO2 Removal Suppliers use standardized tools and methods, which are defined in detail in the [Puro SDG Assessment Requirements](#)

D – CORSIA Requirements Related to ICVCM Category Assessment

8. Additionality Demonstration – CORSIA

Please respond to all questions below.

1) Confirm that your Program's carbon credits represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme's carbon sequestration or removals exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate. Clause 6.5.1 of the General Rules establishes: "A CO₂ Removal Supplier must demonstrate that the project is not required by existing laws, regulations, or other binding obligations."

2) Confirm that your Program's carbon credits exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme's carbon sequestration or removals exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario defined as project baseline. Clause 6.5.2 of the General Rules establishes: "A CO₂ Removal Supplier shall demonstrate CO₂

additionality to the Baseline, meaning that it is resulting in higher volumes of CO₂ removals than the likely Baseline alternatives."

3) Confirm that additionality and baseline-setting is assessed by an accredited and independent validation/verification entity.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

na1.net/hubfs/7518557/Supplier%20Documents/Additionality%20Assessment%20Requirements.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, all projects describe project-specific baseline and additionality according to the Additionality Assessment Requirements, page 1: "In Puro Standard a project specific additionality assessment is required. Puro Standard does not work with automatic additionality criteria or placement on a positive list. CO2 Removal Suppliers shall report the CO2 removals claimed against a baseline which represents a conservative scenario for what would likely have happened without carbon finance (the "counterfactual" baseline)."

In addition, each project's Baseline and Additionality is assessed and verified by a 3rd party auditor and thereafter reviewed by the programme as stated under General Rules v.4.0 clause 2.2.1 "Design validation ... involves a Production Facility Audit by an independent 3rd party auditor, followed by a Production Facility Review by the Issuing Body.". The procedure takes place during the assessment of the Additionality Assessment Report that is part of the Production Facility Audit documentation required in clause 2.2.4.2.vi.

Weblink [Puro.earth_General-Rules_v.4.0.pdf](https://puro.earth/General-Rules_v.4.0.pdf) ([hubspotusercontent-na1.net](https://na1.net/hubfs/7518557/Supplier%20Documents/Additionality%20Assessment%20Requirements.pdf))

4) Confirm that your program reviews additionality and baseline-setting.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the Programme reviews the additionality and baseline as part of the Additionality Assessment Report setting as part of the Design Validation process under clause 2.2 of the General Rules. As can be seen in Figure 2 in page 6 of the General Rules and in clauses 2.2.4 Production Facility Audit and 2.2.5 Production Facility Review, an accredited independent third-party verification entity conducts a Production Facility Audit, and the programme conducts a Production Facility Review, guaranteeing a two-step verification process.

5) Which of the following methods below are used to assess that credited mitigation activities are additional:

- ☐ Barrier analysis
- ☐ Common practice / market penetration analysis
- ☒ Investment, cost, or other financial analysis
- ☐ Performance standards / benchmarks
- ☒ Legal or regulatory additionality analysis
- ☐ Other (please explain below)

URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Additionality%20Assessment%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The Additionality Assessment Requirements is a normative Standard Document that must be followed to conduct an additionality assessment. Investment analysis is the additionality test, whereby project proponents shall provide evidence that the project activity is more financially attractive than the alternatives when carbon finance through emission units is included.

6) If your program provides for the use of method(s) not listed above, please describe the alternative procedures and how you ensure that mitigation activities are additional:

No

URL:

N/A

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro.earth does not use alternative procedures to the ones listed above.

7) Confirm whether your program designates certain mitigation activities as automatically additional (e.g., through a “positive list” of eligible project types).

No

URL:

N/A

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro.earth does not designate any activities as automatically additional.

8) If your program designates certain mitigation activities as automatically additional, do you provide clear evidence on how the activity was determined to be additional?

No

URL:

N/A

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Puro.earth does not designate any activities as automatically additional.

9) Confirm how the procedures described under the above criteria related to additionality provide a reasonable assurance that the mitigation activities would not have occurred in the absence of the carbon crediting program:

Yes

URL:

<https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Additionality%20Assessment%20Requirements.pdf>

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

All projects describe project-specific baseline and additionality according to the Additionality Assessment Requirements. Each project's Baseline and Additionality is verified under the reasonable assurance level by a 3rd party auditor and thereafter reviewed by the programme.

9. Permanence – CORSIA

Please respond to all questions below.

1) List all emissions sectors (if possible, activity types) supported by your program that present a potential risk of reversal of emissions reductions, avoidance, or carbon sequestration:

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

The programme focuses on carbon sequestration activities. All five (5) Methodologies have a potential risk of reversal, and a CO₂ Removal Supplier shall assess the risk and have mitigation measures to manage it, monitor and report it. (Clause 6.7, Permanence and Risk of Reversal).

2) Confirm what the minimum scale of reversal (i.e. threshold of materiality) is for which your program provisions or measures require a response. (Quantify if possible)

No

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

There is no minimum scale of reversal. All issued emission units include a Reversal risk estimation (clause 6.7.3 General Rules). Relevant text: "6.7.3.2 The risk estimation shall include an estimation of risk impact and risk likelihood of every material risk. The methods utilized for estimation must be scientifically justifiable and detailed in the Reversal risk estimation. The estimation must include a description of the methods and values used to estimate impacts and likelihoods, such as statistical methods, peer-reviewed scientific literature or local regulations and guidelines".

3) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme requires that CO₂ Removal Suppliers undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals, covered in clause 6.7.3 of the General Rules. Relevant text: "6.7.3 Methodologies in the Puro Standard shall include a Reversal risk estimation of an issued CORC."

4) For those sectors/activity types identified in CORSIA requirement 9.1 in this

section, confirm that procedures and measures are in place to require and support these activities to monitor identified risks of reversals.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme requires that CO₂ Removal Suppliers monitor the identified risk of reversals, covered in clause 6.7.5.1 of the General Rules. Relevant text: "6.7.5.1 If the CO₂ Removal detects a Reversal event, the CO₂ Removal Supplier shall without delay act to: i. Prevent further reversal from occurring. ii. Notify the

Issuing Body of any the Reversal event. iii. Determine the failure that caused the Reversal event. iv. Calculate the Reversal quantify (in tCO₂e)."

5) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to mitigate identified risks of reversals?

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme requires that CO₂ Removal Suppliers mitigation of risks of reversals, covered in clause

6.7.4 and 6.7.5. Relevant text: "6.7.4 Where material risks are identified, the Methodologies in the Puro Standard shall include obligations on CO₂ Removal Suppliers for risk identification, preemptive risk mitigation, management, and reporting practices. The CO₂ Removal Supplier shall by undertaking the obligations ensure that the issued CORCs remain firmly and durably stored for the long term. 6.7.5 If due to the failure of the CO₂ Removal Supplier to perform these obligations there is a Reversal event, CO₂ Removal Supplier is liable for it and is obliged to provide compensation."

6) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA?

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme ensures that there is full compensation for material reversals of mitigation in all cases, clause 6.7.5 of the General Rules establishes that: "If due to the failure of the CO2 Removal Supplier (...) there is a Reversal event, CO2 Removal Supplier is liable for it and is obliged to provide compensation.". Compensation is further defined in clause 6.7.6.3, which establishes that: "The CO2 Removal Supplier shall deposit CORCs of the same type or, if unavailable, of comparable permanence to the Account of the CO2 Removal Supplier equal to Reversal quantity for the Issuing Body to withdraw."

7) Confirm that provisions are in place that confer liability on the activity proponent to monitor, mitigate, and respond to reversals in a manner mandated in the program procedures?

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme has measures to confer liability to monitor, mitigate and respond to reversals to the CO2 Removal Supplier, as covered in clause 6.7.5 of the General Rules. Relevant text: "6.7.5 If due to the failure of the CO2 Removal Supplier to perform these obligations there is a Reversal event, CO2 Removal Supplier is liable for it and is obliged to provide compensation."

8) Confirm that provisions are in place that require activity proponents, upon being made aware of a material reversal event, to notify the program within a specified number of days.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme requires CO 2 Removal Suppliers to notify the programme in the event of a material reversal event, covered in clause 6.7.5.1 ("without delay") of the General Rules.

Relevant text: " 6.7.5.1 If the CO2 Removal detects a Reversal event, the CO2 Removal Supplier shall without delay act to: i. Prevent

further reversal from occurring. ii. Notify the Issuing Body of any the Reversal event. iii. Determine the failure that caused the Reversal event. iv. Calculate the Reversal quantify (in tCO2e)."

9) Confirm that provisions are in place that confer responsibility to the program to, upon such notification, ensure and confirm that such material reversals are fully compensated in a manner mandated in the program procedures.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme requires such reversals are fully compensated, and covered in the following clauses with relevant text:

- "6.7.6 The Issuing Body reviews the notification, failure, and Reversal quantity. The Issuing Body may seek clarifications from an Output Auditor to form the final opinion.
- The issuing Body subtracts Reversal quantity from the Output volume for the Monitoring Period where the Reversals occurred, or the subsequent Monitoring Period.
- The issuing Body withdraws and invalidates CORCs from the Account of the CO2 Removal Supplier equal to Reversal quantity.
- The CO2 Removal Supplier shall deposit CORCs of the same type or, if unavailable, of comparable permanence to the Account of the CO2 Removal Supplier equal to Reversal quantity for the Issuing Body to withdraw."

12. Sustainable Development Benefits And Safeguards – CORSIA

Please respond to each question below.

1) Confirm that your program has procedures in place to ensure that mitigation activities do not violate local, state/provincial, national or international regulations or obligations.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the Programme has procedures to ensure that offset projects do not violate local, state/provincial, national or international regulations or obligations. Under the principle of no net harm (clause 6.4.1) of the General Rules, the CO2 Removal Supplier shall provide documentation that shall robustly address all material environmental and social impacts that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts. (clause 6.4.3). The texts are:

“A CO2 Removal Supplier shall be able to demonstrate Environmental and Social Safeguards and that the Production Facility activities[1] do no net harm to the surrounding natural environment or local communities.”

And,

6.4.2 6.4.3. “The CO2 Removal Supplier shall provide documentation, that shall robustly address all material[2] environmental and social impacts, including aspects listed in 7.4.1.1, that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.”

1. It shall be noted that the responsibility of the Production Facility operator extends to the imminent environmental and human health related impacts of the use of manufactured products as far as concerned in the Environmental Impact Assessment or environmental permit.
2. In assessment of materiality of negative impacts, CO2 Removal Suppliers can be guided for example by Global Reporting Initiative (GRI) Universal Standards 3: Material topics, or by European Sustainability Reporting Standards (ESRS) Implementation Guidance (IG 1) on Materiality assessment, currently available as a draft.

2) Confirm that your program demonstrates it complies with social and environmental safeguards.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/Supplier%20Documents/Puro_Env_&_Soc_Assess.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Yes, the programme obliges CO 2 Removal Suppliers to respond to a questionnaire addressing compliance in detail with social and environmental safeguards. You may access the questionnaire with the link above.

3) Confirm that your program publicly discloses the institutions, processes, and procedures that are used to implement, monitor and enforce safeguards to identity, assess and manage environmental and social risks.

Yes

URL:

https://7518557.fs1.hubspotusercontent-na1.net/hubfs/7518557/General%20Rules/Puro.earth_General-Rules_v.4.0.pdf

Indicate specific numbered sections/headings or rule text in the URL pertinent to this criterion, clarifying how it is met. You may add additional URLs and any clarifying information. Your application will not be considered complete if specific referenced text cannot be found quickly.

Clause 6.4 of the General Rules contains the programme's public requirements that are used to implement, monitor, and enforce social and environmental safeguards. The evidence can be found in the following sub- clauses:

6.4.1.1 Adhere to the following aspects as described by the Integrity Council for the Voluntary Carbon Market (IC-VCM): i. Abide by national and local laws, objectives, programs, and regulations and, where relevant, international conventions and agreements. ii. Respect for human rights and avoiding discrimination; abiding by the International Bill of Human Rights and universal instruments ratified by the host country. iii. Recognize, respect, and promote the protection of the rights of IPs & LCs (indigenous peoples and local communities) in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and International Labor Organization (ILO) Convention 169 on Indigenous and Tribal Peoples. iv. Labor rights and working conditions, including prohibiting forced labor, child labor or trafficked persons whether in own operations or employed by third parties, fair treatment of employees, and safe and healthy working conditions. v. Providing for equal opportunities in the context of gender; providing equal pay for equal work and protecting against and appropriately responding to violence against women and girls. vi. Pollution prevention, including pollutant emissions to air, water, and soil as well as noise and vibration, and generation of waste and release of hazardous materials, chemical pesticides, and fertilizers. vii. Avoiding or minimizing adverse impacts to community health and safety. viii. Biodiversity conservation and sustainable management of natural resources, including avoiding or minimizing negative impacts on terrestrial and marine biodiversity and ecosystems; protecting the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity; minimizing soil degradation and soil erosion and minimizing water consumption and stress. The CO2 Removal Supplier shall not convert natural forests or high conservation value habitats. ix. Preserves and protects cultural heritage and cultural and religious sites. x. Avoiding forced physical and or economic displacement. If avoidance is not feasible, CO2 Removal Suppliers shall minimize physical and/or economic displacement. This applies also to any access restrictions to lands, territories, or resources, and any customary rights of local right holders.

6.4.2 When the activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO2 Removal supplier shall develop the Production Facility with free, prior, informed consent (FPIC).

6.4.3 The CO2 Removal Supplier shall provide documentation, that shall robustly address all material environmental and social impacts, including aspects listed in 6.4.1.1, that could potentially materialize both within and outside the activity boundary and include information on mitigation measures commensurate with the identified risks to minimize and address any negative environmental and/or social impacts.

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