

PROGRAM NAME: BioCarbon Standard

ORGANIZATION: BioCarbon Cert

ASSESSMENT TYPE: Non-CORSIA Program Level Assessment

DATE OF SUBMISSION: 30 July 2025

DOWNLOADED ON: 24 October 2025

STATUS: In Review

Background

Must Read

Please acknowledge that you have reviewed the details provided in the "Background" section.

We have reviewed the Assessment Framework background materials.

Yes

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.

N/A

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.

Board of Directors

- Francisco Javier Manzanares, Chairman of the Executive Board. World Bank Senior Consultant on Carbon Markets.
- Ricardo Umaña, Industrial Economist, MBA Organizational Development. Extensive experience in leadership, business development, and corporate strategy.
- Miguel Rodriguez, Biologist, MSc. Physiology Applied to Production Systems Expert.
- Alexis Bermudez, Ph.D. bachelor’s degree in education, with emphasis in natural sciences. Specialized in the area of Ethnobiology.

CEO

- Angela Duque Villegas, Forestry Engineer, Specialist in Social Assessment of Projects, M.Sc. Environmental and Natural Resources Economics; Climate Change Expert.

Independent Advisory Group

- Cristina De Andrés, Lawyer, Specialist in Anti-corruption and Whistleblowing Frameworks, AML/CFT and Risk Assessment.
- Federico Piñeros, Anthropologist, MBA in Project Management. Specialist in supporting businesses, indigenous and Afro-descendant rural communities, public entities, and multilateral agencies in creating and deploying collective-impact solutions.
- Lucas Zaehringer, Business Administration, Management of Technology and Innovation, Digital solutions, blockchain transparency and tokenization in carbon market trajectory.
- Yves Mariko, Chief Economist / Senior Associate of Africa Energy Transition Services (AETS)
- Onur Günduru, Manager partner of Orun Energy and board member of ENSIA (Turkish Clean-Tech Cluster)

The BioCarbon Leadership Team is publicly available at BioCarbon Corporate Governance.

<https://biocarbonstandard.com/en/organizational-structure/>

The BioCarbon Leadership Team is publicly available at [BioCarbon Corporate Governance](#)

A full description of the governance framework is available in the BioCarbon [Corporate Governance](#) document. Section 7.

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.

<https://biocarbonstandard.com/en/organizational-structure/>

The organizational chart is in the BioCarbon Website.

The organizational structure of the company (BioCarbon) is defined in its Corporate Governance framework and Standard Operating Procedures (SOP), ensuring independence, transparency, and a clear separation of governance and operational functions.

a) Relationship among governance individuals

The Program is overseen by the Board of Directors, supported by four permanent standing committees: the Governance & Nominations Committee, the Audit, Finance & Risk Committee, the Technical & Methodology Committee, and the Ethics, Compliance & Integrity Committee. These bodies operate independently of the implementation team and are responsible for strategic direction, program oversight, and methodological and ethical integrity.

b) Relationship to staff

The CEO and Managing Director lead the day-to-day operations of the Program. They coordinate the activities of functional units, including the Technical Area, Legal & Compliance, Sustainability, Business Development,

and Administrative Areas. These teams implement decisions approved by the Board and Committees, following the procedures established in the Standard Operating Procedures (SOP).

c) Functional units and interlinkages

The Technical Area develops and maintains standards, methodologies, tools, and scientific guidance, and reports to the Technical & Methodology Committee.

The Legal & Compliance Area ensures conformity with national and international regulations, manages the Ethics & Transparency Program, and oversees impartiality and grievance mechanisms.

The Sustainability Area leads integration of ESG and SDG principles across all operations and manages sustainability reporting.

The Administrative and Strategic Management Areas manage finances, operations, and coordination with the CEO and Board.

The registry system is operated independently by Global CarbonTrace, under a formal service agreement. BioCarbon does not control the registry platform or its infrastructure. This ensures functional separation between program operations and unit tracking, as required by international best practice.

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

BIOCARBON REGISTRY (BCR) is a program that develops and manages carbon and biodiversity standards. BCR relies on its standards, methodologies, and tools to orient GHG projects in the requirements and conditions they shall accomplish to be certified under the program. The corporative governance of the company settles the rules and ethical principles that guide the processes toward corporative compliance pursuing integrity, veracity, and quality.

The mission of BCR since its establishment in 2019 has been to serve as an instrument for driving global climate mitigation actions that enable contributions to sustainable development and resilience by providing high-quality standards and provisions for GHG projects around the world.

The BCR program and its independent registry aim to be an instrument that facilitates measures implemented by countries related to emission accounting, ensuring transparent, reliable, and integral management of emission units issued at the time that promotes the achievement of the Paris Agreement's goals, especially those related to Art. 6.

BCR has four eligible sectors:

1. AFOLU Sector: refers to activities of Agriculture, Forestry, and Other Land Uses
2. Energy Sector: refers to energy generation activities from Non-Conventional Renewable Energy sources (NCRE)
3. Transportation Sector: refers to GHG mitigation activities applied in the transportation sector.
4. Sector Waste: refers to GHG mitigation activities implemented through waste management.

BCR has issued more than 42.6 Million Verified Carbon Credits and projects have retired in the market around 29 million. Within the process of certification, projects shall accomplish all the requirements established by the BCR Standard, methodological documents, and tools available on the BCR website.

The Governance structure informs about the flow of information and coordination between the areas (horizontal) as well as clarify responsibilities for decision-making (vertical). A new area of compliance and sustainability was integrated within the BCR structure (refer to Corporative Governance), details regarding decision-making about methodologies development and approval were analyzed and described in the 38 "Governance document."

More information can be consulted in the link: <https://biocarbonregistry.com/en/docsgovcorp/>

https://biocarbonstandard.com/en/bcr-standard_summary/

BioCarbon Cert manages the BioCarbon GHG Crediting Program known as the BioCarbon Standard, which certifies high-integrity emission reductions and removals across multiple sectors. It applies to a wide range of mitigation activities, including nature-based solutions (NbS), renewable energy, energy efficiency, sustainable transport, and waste management. The program issues only ex-post verified carbon credits, based on ISO and IPCC-aligned methodologies, ensuring environmental, social, and scientific robustness.

Projects certified under the BioCarbon Standard shall demonstrate real, measurable, and additional climate benefits. Approved methodologies address key integrity elements such as permanence, leakage, and uncertainty through conservative approaches and standardized tools for baseline setting, monitoring, and quantification. These provisions are implemented in accordance with the BioCarbon transparency and business ethics program, which ensures credibility, accountability, and impartiality across all certification processes.

The program includes strict requirements to prevent double counting of emission reductions and to ensure the environmental and accounting integrity of all issued credits. It also incorporates a comprehensive framework for sustainable development. These include a Sustainable Development Safeguards (SDSs) tool, covering issues such as human rights, biodiversity conservation, Indigenous Peoples and Local Communities, gender equality, and stakeholder engagement. In addition, the SDG tool requires projects to assess and report measurable contributions to at least three Sustainable Development Goals (SDGs).

BioCarbon's governance framework includes a Board of Directors supported by an advisory group and independent operational teams. We are committed to transparency, continuous improvement, and stakeholder inclusion. A comprehensive Transparency and Business Ethics Program underpins our operations, including policies for managing corruption risks, conflict of interest and ethical behavior, as well as channels for grievance redress.

All Verified Carbon Credits (VCCs) issued under the BioCarbon Standard are managed through the independent Global Carbon Trace registry, which ensures unit-level traceability, public transparency, and robust data security. The registry platform ensures full traceability and public access to credit information, including serial numbers, project origin, issuance dates, transactions and ownership history.

To date, 78.6 million VCCs have been issued under the BioCarbon Standard, representing high-integrity mitigation outcomes across multiple sectors and geographies. Each credit reflects a commitment to quality, transparency, and measurable impact.

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

Yes

<https://biocarbonstandard.com/wp-content/uploads/BCR-Corporate-Governance.pdf>

The BioCarbon Corporate Governance Document is publicly available (link above) and provides information on who is responsible for administering the programme. Section 6 (Program Governance) of the document specifies that the ultimate authority for the administration of the program is the Board of Directors. Section 7 outlines the organizational structure, including the roles and responsibilities for the administration and oversight of various aspects of the program.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 7 (*Organizational structure*) of the [Corporate Governance](#) document outlines the roles and decision-making authorities of the Board of Directors, CEO, and technical bodies. It also provides public information on how decisions are made. For example, it outlines which bodies provide specific types of input to the Board for decisions, and in what manner. It also outlines how Board decisions are then implemented and relayed back to the organization.

Decisions on standards and methodologies follow a structured, participatory process, as per the [Standard Operating Procedures \(SOP\)](#). In particular, Section 15 outlines the procedures for making decisions on Standards and Methodological Documents. Such procedures include public consultation, and the methodology development process, including drafting by the Technical Committee, two rounds of review, and public feedback prior to approval.

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

Yes

<https://biocarbonstandard.com/wp-content/uploads/BCR-Corporate-Governance.pdf>

BioCarbon has been under continuous governance since its establishment in 2019 (formerly known as ProClima). Its governance framework, including oversight by an independent Board of Directors and the active participation of the Technical Committee, has remained consistently in place and publicly documented throughout this period.

The first version of the [Corporate Governance](#) document was issued on April 27, 2020. The current version, 5.0, was released on April 30, 2025. The document includes a "History of Document" section at the end, which records all previous versions and their respective dates of issuance, providing a transparent and traceable record of the program's governance evolution.

Confidential Information Submitted

o ProClima Incorporation

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

Yes

<https://globalcarbontrace.io/carbon-credits>

Yes. BioCarbon has been continuously operational for 6,5 years. The company was incorporated in 2019 under the name ProClima. Since its inception, it has been dedicated to the certification of Greenhouse Gas (GHG) projects and to the promotion of climate change actions. The organization developed its program to foster low-carbon development while ensuring alignment with both national and international climate policies. In 2024, the brand name was changed to BioCarbon Cert. The change in name from ProClima to BioCarbon Cert was strictly nominal, the conceptual framework, operational structure, and core principles have remained consistent with those established since 2019.

The program has been fully operational since its incorporation, continuously developing standards and methodologies. The first Verified Carbon Credit (VCC) was issued in May 2019. The initial version of the Standard of BioCarbon was released by ProClima (now BioCarbon Cert) in 2019 and has served as the basis for the certification of all projects and VCCs issues ever since.

Confidential Information Submitted

o ProClima Incorporation

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Executive_Summary_Long-Term_Plan.pdf

BioCarbon has an operational *Long-Term Administration Plan* that ensures responsible oversight of multi-decadal program commitments. It includes structured governance, risk management procedures, and contingency measures for program continuity, such as a 12-month transition period and a migration protocol. BioCarbon has identified alternative eligible crediting programs that could assume responsibility for the ongoing management and recognition of active projects and issued units, thereby ensuring that mitigation outcomes remain valid, verifiable, and traceable. The plan is supported by a professional liability insurance policy exceeding USD 5 million.

These measures ensure long-term credibility and alignment with permanence obligations.

Confidential Information Submitted

- o BioCarbon Long-Term management Plan
- o Institutional Letter – Program Wind-Down Commitment
- o BioCarbon’s professional liability insurance

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

<https://biocarbonstandard.com/en/corporate-governance/>

Section 8 (*Provisions for unforeseen program dissolution*) of the *Long-Term Management Plan* outlines a 12-month transition period, procedures for project migration and deregistration, and the transfer of all VCCs (including buffers) to preserve traceability and integrity. A public summary is available online, and full details can be requested.

Confidential Information Submitted

o Long-Term Management Plan

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

<https://biocarbonstandard.com/wp-content/uploads/BCR-Code-of-Ethics.pdf>

BioCarbon’s Anti-Corruption Policy and Procedures (Annex 2 and 3), [Code of Ethics](#) (Section 9, Conflict of Interest), and Impartiality Management in the procedures of certification and registration Policy collectively require disclosure of any actual or perceived conflict, prohibit involvement in conflicting activities, and mandate annual and ad hoc declarations.

Also, the [Corporate Governance](#) (Section 5.1.4, Conflicts of Interest) provides a series of "Preventive Measures" applying to all board members, committee members, advisory group members, staff, consultants and any other person with delegated authority over program services, that illustrate well the "robust procedures" that are requested here, such as annual declarations, training, etc.

The Compliance Officer, appointed independently, oversees all conflict-of-interest disclosures, ensures compliance, and delivers ethics training. The [Ethics and Compliance Channel](#) is available to report concerns anonymously. Strict impartiality rules prevent BioCarbon from providing consulting to clients it certifies, and prohibits staff from reviewing projects they were previously involved in. As established in the [Validation and Verification Manual](#), CABs shall comply with BioCarbon's ethics policies, maintain impartiality safeguards, and are subject to oversight.

Regular internal audits, third-party monitoring, and oversight by the Compliance Officer ensure ongoing adherence to these principles. BioCarbon maintains up-to-date registries of gifts, third-party due diligence, and conflicts of interest as part of its compliance infrastructure (*Compliance Officer Handbook*)

Confidential Information Submitted

- o Anti-corruption Policy and Procedures
- o Impartiality Management
- o Compliance Officer Handbook

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

Yes

<https://biocarbonstandard.com/wp-content/uploads/BCR-Code-of-Ethics.pdf>

Section 10 (*Conflict of interest*) of the *Anti-Corruption Policy and Procedures*, including Annexes 2 (*Conflict of Interest Declaration Form*) and 3 (*Annual Declaration Form*), details conflict of interests' procedures. All staff, board members, and committee members shall declare potential conflicts using the official forms.

The Compliance Officer reviews declarations, determines actions (e.g., recusal), and records outcomes in a disclosure register as stated in Section 5 (*Compliance Officer functions*) of the *Compliance Officer Manual*. Annual declarations are also mandatory and logged in the official *Conflict of Interest Log*. Also, Section

5.1.4.1 (Preventive Measures) of the [Corporate Governance](#) document includes identification (of conflicts) and disclosure, and "mitigation and isolation"

Confidential Information Submitted

- o Compliance Officer Manual
- o Anti-corruption Policy and Procedures
- o Conflict of interest

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

<https://biocarbonstandard.canaletico.es/?lang=en>

BioCarbon has a formal agreement with Global CarbonTrace Inc. for the development and administration of the registry platform. This agreement ensures full technical, financial, and administrative independence of the registry administrator, who is not part of BioCarbon's governance and cannot represent the program externally.

Pursuant to Clause 17 of the contract, GCT expressly undertakes to disclose any actual or potential conflict of interest arising in the course of performing the services and to promptly report it to the Compliance Officer of BioCarbon at compliance.officer@biocarbonstandard.com or through the [Ethics and Compliance Channel](#) in accordance with Section 10 (*Conflict of interest*) of the *Anti-Corruption Policy and Procedures* of BioCarbon.

The Registry Administrator holds no fiduciary or governance role and is not authorized to represent BioCarbon in any external or contractual matters, thereby ensuring non-exclusive representation and preventing commercial entanglement. The Registry Administrator operates with full technical, financial, managerial, and administrative autonomy. For its part, BioCarbon does not engage in the commercialization, brokerage, promotion, or negotiation of Verified Carbon Credits (VCCs) issued under its standard. GCT remains subject to continuous oversight as a condition of the agreement.

These safeguards are designed to preserve the independence of registry services and to protect them from financial

or commercial influence, in line with BioCarbon's standards of governance and integrity.

Confidential Information Submitted

o Anti-corruption Policy and Procedures

o Impartiality Management in the Procedures of Certification and Registration Processes

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

<https://biocarbonstandard.com/wp-content/uploads/BCR-Code-of-Ethics.pdf>

BioCarbon Standard engages an independent registry provider, [Global CarbonTrace \(GCT\)](#), which operates under a formal agreement requiring full technical, financial, managerial, and administrative autonomy, as well as clear functional and financial separation from BioCarbon.

Pursuant to Clause 8, 9 and 10 of the contract, subscribed, the Registry operator is required to comply with BioCarbon's ethics, transparency, and conflict of interest policies. Any actual or potential conflicts of interest must be promptly disclosed and managed in line with BioCarbon's Conflict of Interest Policy, the oversight mechanisms defined in its Standard Operating Procedures (SOP), and the terms of the agreement with GCT. In accordance with Section 10 (*Conflict of interest*) of BioCarbon's *Anti-Corruption Policy and Procedures*, all third parties of the BioCarbon are required to avoid or properly manage real or perceived conflicts of interest.

Pursuant to Clause 17 of the contract, GCT expressly undertakes to disclose any actual or potential conflict of interest arising in the course of service delivery and to promptly report such matters to the Compliance Officer at compliance.officer@biocarbonstandard.com or through the [Ethics and Compliance Channel](#), as outlined in the relevant policies.

Pursuant to Clause 8 of the contract, all staff members of Global CarbonTrace are also required to sign and adhere to BioCarbon's *Anti-Corruption Policy* and [Code of Ethics](#), reinforcing their commitment to ethical conduct and proper management of any conflict of interest.

Confidential Information Submitted

o Anti-corruption Policy and Procedures

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?

Yes

N/A

BioCarbon maintains an active professional liability insurance policy. The current insurance policy, issued by Nacional de Seguros S.A., is valid from July 7, 2025, to July 7, 2026, and provides coverage for up to USD \$5,000,000 per claim and in the aggregate.

The policy covers professional negligence, errors, and omissions related to BioCarbon's certification and registry services for climate change mitigation and biodiversity conservation projects. It is a claims-made policy with global coverage, and includes legal defense costs, intellectual property protection, and document loss extensions.

Confidential Information Submitted

o BioCarbon's professional liability insurance (Poliza_400049355_Endoso1)

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

<https://biocarbonstandard.com/en/corporate-governance/>

BioCarbon is governed by an independent Board of Directors that assumes fiduciary responsibility for the oversight, strategic direction, and integrity of the organization and its programs. The Board operates in accordance with the

organization's bylaws and the principles of corporate governance outlined in the BioCarbon [Corporate Governance](#) document.

- Independence: Section 5.1.4 on Conflicts of interest ensures that "BioCarbon maintains a zero-tolerance stance towards financial, commercial, or fiduciary conflicts of interest" and specifies that the policy applies to all Board members who must sign a disclosure statement each year, as well as update it within 10 days of any material change. See this section for other provisions BioCarbon takes to ensure there are no conflicts of interest (including training, compliance, etc.).
- Fiduciary responsibility: The BCR Standard defines Governance Framework in the glossary: "BIOCARBON maintain a formal governance framework that includes an independent Board of Directors with fiduciary responsibility. The Board shall publish annual reports detailing organizational revenues, expenses, mission progress, and major programmatic updates."
- Bylaws: The Board operates in accordance with the organization's bylaws and the principles of corporate governance outlined in the BioCarbon [Corporate Governance](#) document.

Board members are selected for their technical expertise and ethical standing and are not affiliated with entities holding financial interests in credit issuance, ensuring independence and impartiality.

Board members (Directors) are required to act with integrity, diligence, and transparency, and shall comply with BioCarbon's [Code of Ethics](#), *Anti-corruption Policy*, *Impartiality Management*, and all applicable corporate and regulatory frameworks.

Confidential Information Submitted

- o Anti-corruption Policy
- o Impartiality Management

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

https://biocarbonstandard.com/wp-content/uploads/2024_Biocarbon_Report.pdf

Since 2024, BioCarbon has published an Annual Report, as per Section 6 (Program Governance), of the [Corporate Governance](#) document and Section 21 (Post issuance Monitoring and Claim Integrity), of the [Standard Operating Procedures \(SOP\)](#). The 2024 Annual Report includes:

- A detailed overview of BioCarbon's mission, strategic objectives, and its role in promoting high-integrity carbon certification and climate action.
- A description of major programs and activities carried out during the year, including key milestones in standard development, methodology updates, capacity-building initiatives, and global outreach.
- A clear outline of the governance structure, including the composition and responsibilities of the independent Board of Directors, internal controls, risk management practices, and compliance with ethical standards and bylaws.

BioCarbon Cert is a privately held company and is not legally subject to public financial reporting requirements applicable to non-profit organizations. As such, it does not publish its revenues, expenses, or net assets. However, the program generates such this financial report, have it audited by the internal statutory auditor ("revisor fiscal"), and maintains high transparency standards through public disclosure of its governance structure, operational procedures, and key decisions. Programmatic updates, methodologies, approved activities, and oversight bodies are published on the BioCarbon website, ensuring accountability to stakeholders.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Sustainability_Policy.pdf

BioCarbon upholds corporate social and environmental responsibility through strong governance, ethical business conduct, and sustainability commitments. These are outlined in our [Code of Ethics](#), *Sustainability Policy*, and *Anti-Corruption Policy*, which guide operations and stakeholder engagement in alignment with international standards.

Since 2021, BioCarbon has been a participant in the United Nations Global Compact, committing to its Ten Principles related to human rights, labor, environment, and anti-corruption. Each year, we submit a *Communication on Progress (CoP)*, detailing how these principles are integrated across our strategies and operations. This communication is publicly available [here](#).

Confidential Information Submitted

o Anti-corruption Policy

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

Yes

<https://biocarbonstandard.com/wp-content/uploads/BCR-Code-of-Ethics.pdf>

BioCarbon has voluntarily adopted a comprehensive *Anti-Money Laundering, Countering the Financing of Terrorism and Proliferation Financing (AML/CFT/CPF) Policy and Procedures* setting out the measures and standards to which BioCarbon's staff shall adhere in order to prevent BioCarbon and any of its collaborators from being exploited by those engaging in Money Laundering, Terrorist Financing and Proliferation Financing (hereinafter, ML/TF/PF) and other criminal activities.

BioCarbon *AML/CFT/CPF Procedures* both in the acceptance of a client/user of the Registry Platform (hereinafter, "user") and on an ongoing basis enable BioCarbon to know enough about its users and their activities so that it can identify sanctioned individuals and recognize unusual or unexpected activity and accordingly deal with same effectively. These Procedures include, among others:

- 1) Customer Due Diligence (CDD) (Section 9 and 11 and Annex 1 of the *AML/CFT/CPF Policy and Procedures*);
- 2) Sanctions Screening (Section 9 and 11 and Annex 1 of the *AML/CFT/CPF Policy and Procedures*);
- 3) Procedure for Accounts with Potential Matches after Registration (Section 12 of the *AML/CFT/CPF Policy and Procedures*);
- 4) Politically Exposed Persons (PEPs): Acceptance and Ongoing Monitoring Procedures (Section 10 of the *AML/CFT/CPF Policy and Procedures*);
- 5) Suspicious Transactions Reporting: Internal Disclosure Form (Annex 1 of the *AML/CFT/CPF Policy and Procedures*). The Compliance Officer is responsible for assessing and reporting suspicious transactions to the "Unidad de Informacion y Analisis Financiero de Colombia (UIAF)" as per Section 14 of the *AML/CFT/CPF Policy and Procedures*;
- 6) Governance and Compliance: A designated Compliance Officer oversees policy implementation, risk assessment, training, and continuous monitoring. The policy is embedded in the corporate governance structure;
- 7) Training and Awareness;
- 8) Collaborator Screening (Section 15, Collaborator Screening);
- 9) Prohibited Clients Policy (Section 13 of *AML/CFT/CPF Policy and Procedures*).

Additionally, BioCarbon conducts an annual risk assessment, which includes a dedicated section on money laundering risks. The purpose of the BRA is to identify the extent to which its business and its products and services are exposed to ML/TF/PF, as well as the effectiveness of its policies, procedures, and controls to mitigate those risks.

Another critical control is the [Ethic and Compliance Channel](#) which allows BioCarbon staff and external stakeholders to report concerns, including money laundering, terrorism financing, and the proliferation of weapons of mass destruction.

Confidential Information Submitted

o AML/CFT/CPF Policy

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

Yes

<https://biocarbonstandard.com/wp-content/uploads/BCR-Code-of-Ethics.pdf>

BioCarbon's [Transparency and Ethics Program](#) consists of policies and procedures to prevent, detect, and manage corruption, transnational bribery, and related risks.

Key components include:

- a) [Code of Ethics](#), outlining BioCarbon's core values and ethical responsibilities;
- b) Anti-Corruption Policy and Procedures addressing bribery, facilitation payments, conflicts of interest, gifts, sponsorships, donations, and community investments;
- c) *AML/CFT/CPF Policy and Procedures*, establishing controls to detect and prevent the use of BioCarbon's operations for money laundering or terrorist financing.
- d) Procurement Policy and Third-Party Due Diligence Procedures, ensuring responsible engagement with external parties;
- e) Annual Anti-Bribery, Corruption, and AML Risk Assessments, with results documented in the Risk

Register and Summary Report;

- f) Compliance Officer, with independence, adequate resources, and direct access to the Board, as detailed in the Compliance Officer Handbook;
- g) Ethics and Compliance Channel (<https://canaletico.es/en/biocarbonstandard>) for confidential or anonymous reporting without fear of retaliation;
- h) *Whistleblowing Policy* and *Internal Investigations Manual*, supporting transparency and accountability;
- i) Annual Training, covering the [Code of Ethics](#), *Anti-Corruption and AML policies*, relevant laws, and practical scenarios.

Confidential Information Submitted

- o Anti-Corruption Policy and Procedures
- o Procurement Policy and Third-Party Due Diligence Procedures
- o Whistleblowing Policy and Internal Investigations Manual
- o Compliance Officer Handbook
- o Anti-Bribery and Corruption Risk Assessment Report 2024

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 28.1 (*Public information*) of the BCR Standard establishes that registry information is public, except where restricted by law. Key project documents, including Project Document (PD), monitoring reports, validation and verification reports, are disclosed via the [Global CarbonTrace](#) registry.

Section 23.2 (*Public Registry*) of the [Standard Operating Procedures](#) (SOP) details what information is made public, including project data, issued and retired VCCs, and transaction details.

Section 16.2 (*Public Consultation*) of the BCR Standard also ensures all public consultation comments are disclosed and addressed in project documentation, which is made publicly accessible in the registry once the project is registered.

For its part, the Conformity Assessment Body (CAB) shall demonstrate that the audit team has reviewed all information related to the stakeholder consultation and include a conclusion regarding the comments received during the consultation process in the validation report.

BioCarbon systematically collects and documents all comments received during public consultations for proposed methodologies and standards. These comments are consolidated and published in a document titled "Public Consultation Results". Documents and projects going through public consultation are publicly available to review on BioCarbon's [Public Consultation webpage](#).

Additionally, for accessing the Public Consultation Results related specifically to the BioCarbon Standard, the stakeholders can visit the BioCarbon [website](#) and click the "Previous Versions" button.

Regarding registered grievances, that are registered, BioCarbon does not make them public nor information on the responses and/or resolution. For projects, Section 16 (Stakeholder Engagement and Consultation) of the BCR Standard mandates any comment or consultation, and their responses/resolutions, to be included in the project's validation and verification reports.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

BioCarbon publicly discloses its local stakeholder consultation requirements. Among others, Section 16.1 (*Stakeholders' consultation*) of the BCR Standard requires project holders to conduct a stakeholder consultation before validation, providing accessible information on the project's design and its potential environmental and social impacts. Consultations shall include affected communities, local authorities, and diverse social groups (e.g., women, youth), using appropriate languages and formats.

For projects involving IPs or LC, all materials and agreements, including FPIC, shall be translated into the local language. Visual aids shall be used in low-literacy contexts to ensure proper understanding and participation. Project holders shall document invitations, responses, and any resulting changes to the project. A *Stakeholder Engagement Report* summarizing this process shall be published in the project's public registry entry, ensuring transparency and accountability.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Sections 16.2 (*Public Consultation*) of the BCR Standard and 15.1 (*Public Consultation*) of the [SOP](#) outline the requirements that all public consultation processes shall follow.

BioCarbon publicly discloses its provisions and requirements for public comments, including how stakeholder input is collected, reviewed, and integrated into decision-making processes. Transparency is ensured in all public consultation procedures for both standard-related documents and individual project/verifications registrations.

All comments received are compiled in the *BioCarbon Public Consultation Results* document. At the end of each consultation period, BioCarbon issues formal responses to each comment and revises the draft when necessary. After review and approval by the BioCarbon Technical Committee, the final version and the consultation results are published on the BioCarbon website.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf

BioCarbon conducts public comment periods for all standards and methodologies under development. As outlined in Section 15.1 (*Public Consultation*) of the [SOP](#), BioCarbon's Program mandates that every Standard and Methodological Document shall undergo a formal public consultation process.

BioCarbon publishes documents under consultation on its website, clearly indicating:

- (a) That the document is undergoing public consultation;
- (b) The deadline for submitting comments, which shall be no less than thirty (30) calendar days from the date of publication;
- (c) The contact details of the designated recipient for comments.

In addition, the related requirements are outlined in Section 7 (Need for Methodological Development) of the [Methodology Development and Approval Procedure \(MD&A\)](#). According to this section, once a draft methodological document is approved by the Direction and a delegate of the Technical Committee, it shall undergo a 30-day public consultation period on the BioCarbon website. This consultation process is essential to foster transparent engagement between BioCarbon and stakeholders, and to ensure alignment with the core principles of the BioCarbon Standard, namely responsibility, quality, and integrity.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

All new project activities and verification seeking registration under the BioCarbon Standard shall undergo a 30-day public consultation period, as mandated by Section 16.2 (*Public Consultation*) of the BCR Standard

This consultation begins on the date the project holder submits the registration request. During this time, project documents are made publicly available on both the BioCarbon website ([Public Consultation](#)) and [Global CarbonTrace](#) under the respective project. Stakeholders may submit comments using a *Public Consultation standardized form*, which requires their name, organization, and email. Comments are forwarded to the project proponent for review and response.

BioCarbon also allows year-round requests for unpublished documents and ensures all eligible information is disclosed within 15 business days. Continuous stakeholder engagement is required throughout the project lifecycle, and feedback shall be addressed in validation and verification reports.

6) Confirm that your programme conducts public comment periods relating to operational activities

(e.g., ongoing stakeholder feedback)

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Continuous engagement is maintained through open feedback channels such as the PPC Channel and [Ethics and Compliance Channel](#), in line with BioCarbon's [Code of Ethics](#) and *Whistleblowing Policy*.

BioCarbon conducts public consultations on operational activities such as updates to standards, procedures, and governance documents, as required in the following documents of the BioCarbon Standard:

- At the project level: The BCR Standard (Section 16 — Stakeholder engagement and consultation) requires projects to demonstrate meaningful stakeholder engagement during design and implementation phases.
- Standard Operating Procedures (SOP) v2.0 (Section 15.1 — Public Consultation): Establishes all procedures for public consultations of operational procedures.
- Sustainable Development Safeguards (SDSs) v2.0 (Section 7.1.4 — Respect for human rights and inclusive stakeholders' engagement): Requires project holders to maintain ongoing stakeholder engagement practices, including documentation of feedback received during implementation.
- Standard Operating Procedures (SOP) v2.0 (Section 15.2 — Public response to comments and dispute resolution): Establishes procedures that apply to all public consultations.

All comments to the operational procedures and documents are compiled in a Public Consultation Results document, with written responses and, if needed, revisions. Final documents and consultation outcomes are published on the BioCarbon website after approval by the Technical Committee.

A formal dispute resolution mechanism allows stakeholders to raise objections within 30 days of publication. BioCarbon responds within 30 business days.

Confidential Information Submitted

o Whistleblowing Policy

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf

BioCarbon conducts public comment periods relating to additions or revisions to programme procedures or rulesets, and maintains ongoing operational feedback mechanisms that allow stakeholders to participate in the governance and implementation of the program.

Standard Operating Procedures (SOP) v2.0 (Section 23.1 – Website): Confirms the program's commitment to regular public consultations and open mechanisms for operational feedback on methodologies, tools, and governance procedures.

Section 15.1 (*Public Consultation*) of the SOP and Section 7 (*Need for Methodological Development*) of the MD&A requires that all Standards and methodological documents, including any additions or revisions, undergo formal public consultation before approval and implementation.

Consultation periods are announced on the BioCarbon website and mailing lists and are open to all stakeholders, including project holders, Conformity Assessment Bodies, IPs and LCs, and civil society. Feedback is submitted via standardized forms, reviewed by technical bodies, and documented in the decision-making process.

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.

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard allows the certification of GHG mitigation activities at the project level, including both individual project-based activities and grouped projects. Jurisdictional-scale activities (e.g., jurisdictional REDD+ or policy-level interventions) are not eligible under BioCarbon (Scope of the BCR Standard).

In this sense, the BioCarbon Standard certifies project-based mitigation activities, which constitute the primary unit of certification. All eligible activities shall be implemented within a defined geographic boundary.

Each project shall establish a validated Monitoring Plan, apply conservative quantification procedures, and demonstrate compliance with permanence and risk management requirements.

Supporting document and sections:

- BCR Standard: Section 7 (Scope), Section 11 (General Requirements), Section 12.3 (Permanence and Leakage), Section 20 (Grouped Projects), Section 21 (Monitoring Plan) and Section 11.5 (Project Length and Quantification Periods).

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.

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 11 (*General Requirements*) of the BCR Standard defines the eligibility criteria for offset activities across sectors, project types, and geographic locations.

Eligible sectors and project types include:

- **Agriculture, Forestry and Other Land Use (AFOLU)**: covering Afforestation, Reforestation, and Revegetation (ARR), and Reducing Emissions from Deforestation and Forest Degradation (REDD+).
- **Energy**: encompassing Non-Conventional Renewable Energy (NCRE) sources (solar, wind, biomass, small-scale hydroelectric projects between 500 kW and 20,000 kW run-of-river), and energy efficiency initiatives.
- **Transportation**: involving fuel switching and other emission reduction methods.
- **Waste** handling and disposal: including solid, liquid, industrial, household, and mixed waste management and disposal.

The BCR Standard allows the registration of projects in any country worldwide.

Small- and large-scale distinctions apply to Energy, Transportation, and Waste sectors per Clean Development Mechanism (CDM) definitions

(https://cdm.unfccc.int/methodologies/documentation/meth_booklet.pdf)

AFOLU activities are not categorized by scale.

Other eligibility criteria include start date, project duration and quantification periods, additionality, legal compliance, and climate change adaptation measures.

All eligibility requirements are detailed in the BioCarbon Standard and made publicly available via the BioCarbon [website](#).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

BioCarbon has a robust and transparent local and global stakeholder consultation processes, which provide for public comment and issue resolution. Issue resolution is addressed through defined procedures in the [SOP](#).

At the project level, as detailed in Section 16.1 (*Stakeholders consultation*) of the [BCR Standard](#), all project holders should carry out a stakeholder consultation before validation, in order to provide information on the project's activities, design and facilitate access to all information related to the project's potential environmental and social effects. This includes:

- Participatory and culturally appropriate consultations before project validation (Section 16.1, Stakeholders' consultation),
- A 30-day public consultation period for all GHG projects during the registration process, where comments can be submitted online and reviewed transparently (Section 16.2, Public Consultation), and
- Continued stakeholder feedback mechanisms throughout the life of the project, including during verification stages, to assess ongoing impacts and ensure adaptive responses.

At the program level, as detailed in Sections 15.1 (Public Consultation) of the SOP and section 28.1.1 (Transparency and stakeholder participation) of the BCR Standard, to ensure the transparency, inclusiveness, and continuous improvement of the BIOCARBON Program, all Standards and Methodological Documents, including any additions or

revisions, are subject to a formal public consultation process prior to their approval and implementation.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

BioCarbon has a transparent, accessible, and impartial Grievance Mechanism available at both the program and project levels, as outlined in our [Manual for Handling Requests, Complaints and Claims](#) and BCR Standard (Section 16, *Stakeholder engagement and consultation*).

Stakeholders can submit requests, complaints, or claims through the [PCC Channel](#) or the [Ethics and Compliance Channel](#), which also allows for anonymous and confidential reporting. These tools support the resolution of concerns related to data rights, ethics violations, corruption, human rights, and more.

At the project level, as detailed in Section 16 (*Stakeholder engagement and consultation*) of the [BCR Standard](#), all project holders shall implement a grievance mechanism that is culturally appropriate, free of charge, and accessible to civil society, Indigenous Peoples, and Local Communities. Unresolved cases can be escalated to BioCarbon or an independent arbitrator.

All cases are handled under BioCarbon's *Whistleblowing Policy* and *Internal Investigations Manual*, ensuring fair, secure, and confidential treatment.

Confidential Information Submitted

Whistleblowing Policy & Internal Investigations Manual

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard defines a Verified Carbon Credit (VCC) as a tradable unit equivalent to one metric ton of carbon dioxide equivalent (BCR Standard, Annex A. *Glossary of terms*). Section 16.6 (*Verified Carbon Credits (VCCs) Issuance*) of the Standard Operating Procedures ([SOP](#)) ensures each VCC is assigned a unique serial number in the [Global CarbonTrace](#), guaranteeing full traceability and integrity.

Each serial number captures key attributes: project origin, country, sector, crediting period, issuance year, and status (active, reserved, or retired). Once retired, the VCC is removed from the available balance and cannot be reused.

The registry publicly displays serial details, including issuance and retirement dates, retired volumes, and the entity responsible for retirement. All related information is publicly available via the BioCarbon website and the registry platform.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard defines a Verified Carbon Credit (VCC) as a unique, ex-post certified unit equivalent to one tonne of CO₂e, linked to a specific mitigation outcome. Each VCC carries full traceability of issuance, ownership, and retirement history. Property aspects are defined in the BCR Standard (Section 13) and [SOP](#) (Section 16.6) and enforced through registry rules and contractual agreements (Registry's ToU - Confidential document).

BioCarbon ensures the property aspects of each VCC through unique, traceable serial numbers issued via the Global CarbonTrace registry. Each serial distinguishes the unit, confirms its origin and vintage, and prevents double issuance or double counting. This information is available in the Serials section of the public registry, [Global CarbonTrace](#).

The property rights associated with each unit are clearly established in the BioCarbon Standard documentation, including project registration contracts and issuance protocols, ensuring legal clarity and enforceability. Ownership of the unit is transferred via registry transactions, and all transfers are permanently recorded and auditable.

As stated in Section 16.7 (*VCCs Transfers and Retirements*) of the [SOP](#), when VCCs are transferred, a formal transfer statement is issued identifying the new legal owner. The unique serial numbers assigned to the transferred VCCs remain unchanged, ensuring traceability and continuity. All transfers are recorded in the registry to ensure transparency and prevent double claims.

All serials and transaction histories are publicly accessible at: <https://globalcarbontrace.io/transactions>.

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

Yes

<https://globalcarbontrace.io/>

BioCarbon utilizes an electronic registry system to manage the issuance, transfer, and retirement of all Verified Carbon Credits (VCCs). This function is provided by Global CarbonTrace registry (www.globalcarbontrace.io).

Each unit is assigned a unique serial number upon issuance, and all transactions, such as transfers, retirements, and cancellations, are recorded in real time and are auditable. The registry supports full lifecycle tracking of units and enables public access to relevant project and unit information, including project documentation, ownership history, and credit status.

This electronic system serves as a secure and independent infrastructure to safeguard against double issuance, double counting, and unauthorized transfers, thereby reinforcing the credibility and reliability of the Program.

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

https://globalcarbontrace.io/docs/page/GCT_Handbook-and-good-practices-Registry-Platform.pdf

BioCarbon has established procedures to ensure that its registry, has the technical and procedural capabilities to transparently identify emissions units that are deemed CCP-approved, across all account types.

The registry is equipped to assign specific tags and metadata to units, enabling the clear identification of CCP-approved units in both public views and internal account records. These labels are securely linked to the unique serial number of each Verified Carbon Credit (VCC) and persist through all transactions, including transfers, retirements, and cancellations.

This functionality ensures full traceability and transparency of CCP-approved status and aligns with the Integrity Council for the Voluntary Carbon Market (ICVCM) requirements for unit-level differentiation in the registry system.

BioCarbon has prepared its internal operational procedures for the identification and tracking of emissions units deemed CCP-approved. This document outlines the mechanisms by which units are evaluated, labeled, and transparently managed in the Global CarbonTrace registry in accordance with ICVCM requirements.

The full document is complete and finalized. However, it will be made publicly accessible via a dedicated URL once the BioCarbon Standard has been officially approved by the Integrity Council for the Voluntary Carbon Market (ICVCM).

Public release pending ICVCM approval.

Confidential Information Submitted

o BioCarbon_CCP Label Procedures

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

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Standard_Operation_Procedures.pdf

The Registry Platform of BioCarbon, operated by Global CarbonTrace, assigns a unique serial number to each [Verified Carbon Credit \(VCC\)](#), enabling full traceability from issuance to transfer, cancellation, or retirement. Ownership and transaction history are recorded in real time and made publicly accessible through the registry interface. The traceability is enabled through the Registration Platform, which records and displays:

- The issuance of VCCs;
- Transfers between account holders;

- Retirement of VCCs;
- The total number of active and withdrawn VCCs per project.

By accessing an Account Holder on the Registration Platform, users can monitor and consult the following information in real time:

- a) Total number of active VCCs;
- b) Number of retired VCCs;
- c) Volume of VCCs transferred;
- d) Registered transfers (including sender, recipient, quantity, serial numbers, and dates);
- e) Registered retirements (including project name, end-user, quantity, serial numbers, and dates)

Additionally, the [Public Registry](#) provides transparent and publicly accessible information regarding the custody and status of VCCs, supporting full accountability and auditability throughout the credit lifecycle. Section 17 (*Traceability and Custody of VCCs*) of the [SOP](#) include the procedures in place to facilitate tracking and transfer of unit ownership/holding from issuance to cancellation/retirement.

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

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Standard_Operation_Procedures.pdf

BioCarbon and the registry administrator have established [clear procedures](#) to ensure that the status of each Verified Carbon Credit (VCC), including issuance, transfer, retirement, and cancellation, is transparently recorded and publicly accessible through the Registration Platform operated by [Global CarbonTrace](#).

The system displays, in real time, all transactions associated with each VCC from the moment of issuance to its final retirement or cancellation. Each unit's status is continuously updated and reflected in the account interface of the registry user. This includes the current holding status, ownership, and complete transaction history.

Moreover, the platform provides public access to key unit status information through the Public Registry, which allows stakeholders to trace individual VCCs using their unique serial numbers. Specifically:

- All issued VCCs and their corresponding serial numbers are listed in the following section: <https://globalcarbontrace.io/carbon-credits>
- All retired VCCs, including serial numbers and the name of the entity or individual on whose behalf the retirement was conducted, are publicly available at: <https://globalcarbontrace.io/transactions>

These measures ensure full traceability, accountability, and transparency in line with requirements for registry functionality and unit integrity.

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

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Standard_Operation_Procedures.pdf

Section 28 (*Registry governance and procedures*) of the [BCR Standard](#) establishes that BioCarbon's public registry (Global CarbonTrace) allocates a unique serial number to each Verified Carbon Credit (VCC) corresponding to a greenhouse gas emission reduction or removal. This serial number ensures that every issued unit is distinct, traceable, and non-fungible, in full compliance with the requirement for uniquely identified units.

[Each serial number](#) uniquely identifies a Verified Carbon Credit (VCC), distinguishing its type and purpose, whether allocated to the BioCarbon (BCR) Reserve, the Project Reserve (VCC Reserve), or available for active use. The serial also encodes the crediting period (year), and the number of credits issued for that period.

These serials are formally certified through the VCC Issuance Statement, a document issued to the Account Holder that registered the project. This statement confirms the issuance and legal rights associated with the VCCs, as well as key information about the originating project.

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

[The Serial ID](#) of VCCs encompasses the Country where the project has been implemented, the sector of origin as well as the vintage initial and final and more relevant information (see answer c) as follows:

- Name of the Standard (PCR for BCR Registry)
- Country code

- User ID (Project holder)
- Sector
- Consecutive of the project number registered by the user
- Type of destination
- Starting Vintage (yymm)
- Ending Vintage (yymm)
- Initial Serial
- Final Serial

All VCC issued by BCR are disclosed on the carbon credits page, including information about the project, the owner, the quantification period, and serial ID, among others. The table also shows the status of the VCC per project.

<https://biocarbonregistry.com/en/carbon-credits/>

Projects information: <https://biocarbonregistry.com/en/projects/>

transactions (retirement): <https://biocarbonregistry.com/en/transactions/>

<https://globalcarbontrace.io/docs/page/Serials-BioCarbon.pdf>

Yes. The [Global CarbonTrace Registry](#) publicly displays all issued Verified Carbon Credits (VCCs), each with a unique serial number. For every unit, the registry provides:

- Country and sector of origin
- Credit vintage (year of emission reduction/removal)
- Original project registration date
- Unit status (active, retired, or reserved)

This information ensures transparency, traceability, and differentiation of credits. The original registration date, visible in project entries such as [this one](#), reflects the formal approval and listing of the project under the BioCarbon Standard, following a complete review of eligibility documentation and review protocols.

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

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Standard_Operation_Procedures.pdf

As outlined in Section 24 (*Registry System Security*) of the [SOP](#), the public registry is built following secure coding practices and robust cybersecurity protocols to ensure confidentiality, integrity, and availability of registry data.

The Contract with GCT requires the Registry Administrator to maintain a publicly accessible, secure platform with features such as unit traceability, encrypted data storage, multifactor authentication, and restricted access controls.

To strengthen oversight, BioCarbon has established the following safeguards:

- Annual Audits by BioCarbon or an independent third party;
- Mandatory access to technical documentation (e.g., change logs, incident logs);
- Annual performance and transparency reporting;
- Traceability and version control of all system changes;
- Proactive cybersecurity policies and rapid vulnerability response (within 48 hours).

These measures collectively ensure that the registry platform remains secure, transparent, and resilient, in line with BioCarbon's governance and risk management standards.

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

Yes

https://globalcarbontrace.io/docs/page/GCT_Handbook-and-good-practices-Registry-Platform.pdf

The Global CarbonTrace registry supports standardized metadata formats (JSON, XML), RESTful API access, and is interoperable with global platforms ([SOP](#), Section 25). The system architecture is modular and compatible with bilateral registry connections, ensuring secure and consistent data exchange across platforms.

For example, the Global CarbonTrace registry is integrated with the [Climate Action Data Trust \(CAD Trust\)](#) through its API, enabling the secure, standardized exchange of registry metadata. This connection allows BioCarbon-issued units to be discoverable within the decentralized global infrastructure maintained by CAD Trust, enhancing transparency, interoperability, and alignment with international market infrastructure.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Standard_Operation_Procedures.pdf

All requests to open a registry account are subject to screening procedures that include Know Your Customer (KYC) documentation, conflict-of-interest review, and integrity checks.

BioCarbon has provisions for screening registry account requests, in line with its *AML/CFT/CPF Policy* (Sections 9, *Customer Due Diligence Policy*, and 12, *Targeted Financial Sanctions Policy*).

The obligations for BioCarbon staff and registry users to follow the AML/CFT/CPF Policy are set out in Section 12 of the [SOP](#) and Section 2 of the [Handbook on Good Practices](#).

Requests undergo KYC, sanctions screening, and adverse media checks via screening software. High-risk individuals or entities may be denied access. Ongoing monitoring is performed for all account holders. The registry administrator publishes a notification of the application on the Registry website, allowing third parties to submit comments prior to approval. These provisions ensure transparency and due diligence in account registration:

"We inform about the use of the data provided by the user to consult global databases (Sanctions List), we will carry out the procedures established for the verification of the identity of the person and the sanctions related to him/her or to the company requesting the opening of the account. This procedure was implemented and designed following the recommendations of the exhaustive analysis during the design of the anti-corruption policy and associated procedures. This procedure is informed to users during the opening account process within the Registry's platform, being necessary for the "consent to the processing of personal data" to proceed with the screening of persons and entities against sanctions lists."

If a match to a sanctioned entity is found post-registration, the account is frozen, investigated by the Compliance Officer, and either canceled or reactivated based on findings. Related Verified Carbon Credits (VCCs) may be moved to a reserve pool until further decision by management.

Finally, all applicants shall accept BioCarbon's Terms of Use, Data Protection Policy, and AML/CFT/CPF procedures before an account is created.

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o AML/CFT/CPF Policy

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Standard_Operation_Procedures.pdf

The BioCarbon registry restricts account access to legally registered individuals and businesses. All applicants shall submit valid identification, legal incorporation documents (where applicable), and complete Know Your Customer (KYC) forms. Anonymous accounts are not permitted.

As stated in [SOP](#) Section 16.1 requires legal documentation to verify the applicant's identity. Only approved individuals or entities receive access, with unique, non-transferable credentials and multi-factor authentication for security.

The account request undergoes a formal review and approval process, and only verified applicants are granted access. Each approved user receives a unique, non-transferable login credential, and multi-factor authentication is implemented to safeguard registry access.

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

Yes

https://globalcarbontrace.io/docs/page/GCT_Handbook-and-good-practices-Registry-Platform.pdf

As outlined in Section 10 (Security of the Registry Platform) of the [GCT Handbook-and-good-practices- Registry-Platform](#) and Section 24 (*Registry System Security*) of the Standard Operating Procedures ([SOP](#)), the registry administrator conducts monthly vulnerability scans using the Acunetix platform. This includes Interactive Application Security Testing (IAST) through DeepScan, SmartScan, AcuMonitor, and AcuSensor, integrated with continuous integration tools such as TeamCity, Bamboo, Azure DevOps, and GitLab.

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

<https://biocarbonregistry.com/en/transactions/>

The BioCarbon Standard requires identification of the entity or individual on whose behalf a Verified Carbon Credit (VCC) is retired. This requirement is explicitly stated in:

- Section 16.7.1 (*Retirement Declaration and identification of beneficiary*) of the [SOP](#), specifies that all retirement requests shall clearly indicate the name and contact information of the beneficiary of the retirement; and
- Section 6 of the [Handbook and Good Practices](#) – Registry Platform, which stipulates that all retirements recorded in the public registry shall include the entity or individual for whom the credits were retired. This information is permanently recorded and displayed in the Global CarbonTrace public registry, accessible at <https://globalcarbontrace.io/transactions>, where each retirement statement includes the full serial range, retirement date, and beneficiary name.

2) requires the identification of the purpose of retirement

Yes

<https://globalcarbontrace.io/transactions>

The BioCarbon Standard requires that the purpose of retirement be identified and documented at the time of request. As outlined in Section 16.7 of the [SOP](#), all retirement submissions shall specify the reason for retirement, such as corporate claims, offsetting, labeling, or compliance. Additionally, Section 6 of the [Handbook and Good Practices](#), GCT Registry Platform requires that the declared purpose be publicly visible in the registry. This ensures transparency and allows third parties to verify the beneficiary and intended use of each retired unit.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

BioCarbon and GCT ensures the integrity of credit issuance through automated registry validations, rigorous project verification by accredited CABs, multi-layer technical reviews, and strict issuance controls. The system prevents duplicate or erroneous serials, flags over-issuance, and allows for corrective action, including cancellation of invalid units. In case of errors, BioCarbon conducts formal investigations on the cause of erroneous issuance and informs relevant stakeholders in line with its [Transparency and Ethics program](#). As outlined in the [SOP](#) (Sections 16.6 and 22), the [ADC Tool](#) (Section 9), and the [BCR Standard](#) (Section 14.1.1 Reserve percentage and reserve accounts), the program incorporates robust safeguards to prevent and manage incorrect issuance of Verified Carbon Credits (VCCs).

3.1 Information - CORSIA

CORSIA requirements related to transparency:

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires that all validation and verification results be published in the public registry. Section 28.1 of the BCR Standard establishes that registry information is public unless legally classified as reserved. The SOP (Sections 23.1 and 23.2) mandates that validation and verification reports, along with CAB-issued statements, be uploaded to the Global CarbonTrace registry prior to project registration and credit issuance. Additionally, the Handbook and Good Practices, Public Registry of the Registration Platform (Section 8) specifies that these documents are permanently accessible in the "Project Documentation" section of each registry entry, ensuring full transparency

for all stakeholders.

In the following link it is possible to see an example: <https://globalcarbontrace.io/projects/85>.

3.1 Information

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 28.1 of the [BCR Standard](#), signals that BioCarbon ensures public access to all relevant documentation, except for the data that is classified as reserved by law. This guarantees open access to key project documentation. All relevant documents, including the PD, monitoring report, validation, and verification reports, are available through the registry.

All projects registered in the Global CarbonTrace registry include published documentation that enables replication of results, including baseline, additionality, monitoring, and quantification details. The key assumptions, parameters, formulas, and methodologies used in the quantification of mitigation outcomes are publicly available through the Global CarbonTrace registry. As per [SOP](#) Section 16.3 and the [Registry Handbook](#) (Section 3), project holders and CAB shall upload the full project dossier, including the Project Document, monitoring and validation/verification reports, CAB statements. Additionally, Section 3 of the BCR Template GHG Projects (Quantification) requires the inclusion of calculation spreadsheets. Redactions are permitted only under limited circumstances related to legally protected confidentiality or intellectual property.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Project holders shall use the templates and provisions established in the BCR Standard and the documents of the Program. The BioCarbon *GHG Project Template* is available in the BioCarbon website (under "[Templates](#)"). The document includes, among others, the following:

- Summary description of the project: addressing a non-technical summary;
- Section 2, *General description of the project*, including detailed information on the mitigation activities (technologies or measures) and location;
- Section 3, *Quantification of GHG emissions reduction* (3.1 *Quantification methodology*);
- Section 5, *Carbon ownership and rights*, including project holder and project participants;
- Section 6. Climate change adaptation, including information on climate change adaptation activities derived from the GHG project activities;
- Section 8. *Sustainable development safeguards (SDSs)* thought a social and environmental assessment.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BCR Standard defines and discloses the required monitoring and compensation periods for all projects subject to permanence risk.

All projects subject to reversal risk are required to monitor and compensate for any verified reversals for a defined minimum period. For projects starting after 31 December 2026, this period is at least 40 years from the start of the first quantification period. These provisions are detailed in Section 14.2.1 of the [BCR Standard](#) and are publicly accessible.

These provisions are also set out in the [Permanence and Risk Management Tool](#) (Section 4).

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

<https://globalcarbontrace.io/>

Section 23.1 (*Website*) of the [SOP](#) confirms that all relevant program documents, including standards, methodologies, procedures, and corporate governance instruments, are made publicly available through BioCarbon's [website](#).

BioCarbon also maintains a formal, public channel for stakeholders to submit petitions, complaints, and claims through its [PCC channel](#). As outlined in Section 5.1, *Customer service and user rights*, of the [Policy and Procedures Manual for Handling Requests, Complaints and Claims](#), any requested information not subject to legal, confidentiality, or data protection restrictions will be reviewed, disclosed, and published alongside other relevant public documents.

Requests may be submitted in multiple formats, including digital means, and shall be addressed in a timely and effective manner. Section 5.2 (*Communication channels*) outlines the available communication channels.

The process and procedures for handling such requests, including timelines, means of communication, and evaluation steps, are detailed in Section 6 (*Processes and procedures*) of the same manual.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard includes clear procedures for the validation of activities. The main document that provides the requirements and procedures for validation is the Validation and Verification Manual. There are also provisions outlined in the BCR Standard (Sections 22–23) and SOP (Section 16).

There are also provisions as outlined in the [BCR Standard](#) (Sections 22–23) and [SOP](#) (Section 16). CABs independently assess project design, baseline, additionality, safeguards, and monitoring plans to ensure compliance. Validation shall meet assurance and materiality thresholds, and results are documented in a Validation Report and Statement.

Further details are provided in the [Validation and Verification Manual](#) (Section 8).

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The Program has comprehensive, publicly available instruments that govern the verification of greenhouse gas (GHG) emission reductions and removals.

The main document that provides the requirements and procedures for verification is the Validation and Verification Manual. The BCR Standard also provides reference to verification, for example:

- Section 22.4 (*Verification*) of the [BCR Standard](#) describes that the Conformity Assessment Body (CAB) shall assess conformance with all applicable requirements, including the principles, rules, and methodological provisions of the BCR Standard, within the defined scope of verification.
- Section 12.4 (*Mitigation results*) requires that credits under the BCR Standard are issued exclusively on an ex-post basis, meaning they are granted only after the emission reductions or removals have been fully monitored, verified, and achieved. In consequence, no project may generate Verified Carbon Credits unless its GHG results have been independently validated and verified by a Conformity Assessment Body duly accredited.
- Section 9 (*Validation and verification requirements*) of the [Validation and Verification Manual](#) set out the underlying principles, mandatory requirements, and the seven-step procedure that accredited CABs shall follow, covering risk-based planning, sampling, assurance level, materiality thresholds, audit execution, and independent technical review.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_validation-and-verification-manual.pdf

Project holders shall ensure that the validation and verification processes are carried out by an accredited and independent third-party. They shall confirm that the CAB meets all accreditation requirements with the authorities defined in the BCR Standard.

Section 23 (*Conformity Assessment Bodies*) of the [BCR Standard](#) sets the mandatory criteria that Conformity Assessment Bodies (CABs) shall satisfy to conduct validation and verification engagements.

Comprehensive guidance on obtaining BioCarbon recognition, including the [Validation and Verification Manual](#) and the application form, is publicly available on the BioCarbon website (<https://biocarbonstandard.com/en/validation/>).

The site also hosts an up-to-date register of approved and active CABs, complete with contact details and direct links to their accreditation certificates.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard has defined standards and procedures for the accreditation of Conformity Assessment Bodies (CABs). (as above, ref: BCR Standard, Section 23) CABs shall be accredited under ISO 14065 and ISO 17029 by an IAF-recognized Accreditation Body ([BCR Standard](#), Section 23) and approved by BioCarbon following a structured application and review process ([Validation and Verification Manual](#) (Section 8)).

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires that all projects undergo validation prior to, or in parallel with, the first verification. Validation shall confirm project eligibility, baseline, additionality, and the monitoring plan before Verified Carbon Credits (VCCs) can be issued.

- o Section 24 (*Project Registration & Issuance of VCCs*) of the [BCR Standard](#) states that "After the validation process is complete, the verification process takes place".
- o BCR Standard (Sections 22.5 and 22.6):
 - o *Sequencing*: "Validation and first verification may be carried out in a single validation and verification process."
 - o *Interval rules*: Verifications shall occur at least once every 5 years (AFOLU) or 3 years (non AFOLU) after the initial validation.

Together, these provisions ensure that:

1. Initial validation is mandatory and shall either precede or be combined with (never follow) the first verification.
2. All subsequent verifications adhere to the maximum interval limits, preserving the continuous integrity of the project's GHG performance data.

Accordingly, the Program's documented procedures fully satisfy the requirement that validation occurs prior to, or, where expressly allowed, concurrently with, verification.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard has defined standards and procedures for the accreditation of Conformity Assessment Bodies (CABs). CABs shall be accredited under ISO 14065 and ISO 17029 by an IAF-recognized Accreditation Body ([BCR Standard](#), Section 23).

GHG projects shall undertake validation and verification processes by an independent third body (Conformity Assessment Bodies (CABs)), to ensure that the applied GHG emissions reduction or removal quantification methodologies are verifiable in the framework of ISO 14064-3. Section 9 (Validation and verification requirements) of the [Validation and Verification Manual](#) specifies how the CABs should perform the measurement and verification of mitigation results.

CABs shall be accredited by an accreditation body that is a signatory member of the International Accreditation Forum (IAF), should be able to go through an annual internal evaluation to demonstrate knowledge of BioCarbon Standard and shall provide evidence of their auditors being experienced in the sectors of BioCarbon scope of work, among other requirements.

Section 8 (*Conformity Assessment Bodies (CABs)*) of the [Validation and Verification Manual](#) also provides information on the requirements CABs shall comply with and the process to undergo the validation and verification activities.

Section 16.3 (*Project registration request*) of the [Standard and Operating Procedures \(SOP\)](#) mentions that CABs are responsible for ensuring that the project meets all requirements established in the Standard and complies with all applicable laws and regulations.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard only issues Verified Carbon Credits (VCCs) after ex-post third-party verification of mitigation results. According to [BCR Standard](#) (Section 24), the [Validation and Verification Manual](#) (Section 10) and [SOP](#) (Section 16.6), all GHG reductions or removals shall be verified by an accredited Conformity Assessment Body (CAB) and reviewed by BioCarbon before issuance is authorized.

The Section 16.6 of the BCR Standard states that BioCarbon only issues credit following ex-post verification of mitigation.

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

<https://biocarbonstandard.com/en/corporate-ethics-and-transparency-program/>

Section 8.2.4 (*Compliance with BioCarbon's Anti-Corruption Policy and Procedures and AML/CTF/CPF Policy and Procedures*) of the [Validation and Verification Manual](#) states that the CAB shall certify that no conflict of interest exists in the provision of its services to the project holder. However, if BioCarbon determines at any point that a potential conflict of interest may arise, it will promptly inform the CAB.

Also, the provisions for Conflict of Interest management apply to Conformity Assessment Bodies (CABs) and program staff. CABs shall demonstrate independence from project proponents and from BioCarbon. For each validation or verification, the CAB is required to submit a signed declaration of absence of conflict of interest.

These declarations are published in the public registry under each project's documentation. Additionally, when validation and verification are conducted separately, they must be performed by different CABs. From the third verification onward, a CAB may conduct a maximum of two consecutive verifications, provided the audit team changes. These provisions ensure institutional and individual impartiality.

Section 22.8 of [BCR Standard](#) (Independence, confidentiality, and conflict of Interest safeguards) provide also provisions to prevent conflicts of interest between accredited third-parties performing the validation and/or verification procedures.

In addition, BioCarbon's [Transparency and Business Ethics Program](#) outlines the ethical standards to which all team members and third parties shall adhere.

Confidential Information Submitted

- o Anti-Corruption Policy and Procedures
- o Impartiality Management Policy

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

N/A

As per Section 10 (*Conflict of interest*) of the *Anti-Corruption Policy and Procedures*, BioCarbon requires all associated persons, including accredited third parties, to disclose any real or perceived conflicts of interest, such as promoting or dealing in the offset credits under evaluation.

Disclosures shall be made to the Compliance Officer or via the [Ethics and Compliance Channel](#).

Additionally, the *Impartiality Management Policy* in Certification and Registration Procedures ensures decisions are based solely on objective compliance, free from external influence or fiduciary interests.

Confidential Information Submitted

- o Anti-Corruption Policy and Procedures
- o Impartiality Management Policy

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://biocarbonstandard.canaletico.es/?lang=en>

As outlined in Section 10 (*Conflict of interest*) of the *Anti-Corruption Policy and Procedures*, BioCarbon requires any actual or potential conflict of interest to be reported to the Compliance Officer via email or through the [Ethics and Compliance Channel](#), using the *Conflict-of-Interest Declaration Form* (Annex 2).

The Compliance Officer evaluates the case and decides whether the person may proceed, shall withdraw from the activity, or recuse themselves from decision-making. All outcomes are documented and communicated to the individual and Top Management for acknowledgment within three days.

Section 10 (*Conflict of interest*) of the *Anti-Corruption Policy and Procedures*, including Annexes 2 (*Conflict of Interest Declaration Form*) and 3 (*Annual Declaration Form*), details conflict of interests' procedures. All staff, board members, and committee members shall declare potential conflicts using the official forms.

The Compliance Officer reviews declarations, determines actions (e.g., recusal), and records outcomes in a disclosure register as stated in Section 5 (*Compliance Officer functions*) of the *Compliance Officer Manual*. Annual declarations are also mandatory and logged in the official *Conflict of Interest Log*. Also Section 5.1.4.1 (Preventive Measures) of the [Corporate Governance](#) document includes identification (of conflicts) and disclosure, and "mitigation and isolation"

Confidential Information Submitted

- o Anti-Corruption Policy and Procedures

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

As per section 11.5 ([BCR Standard](#)), any activity seeking renewal at the end of its quantification period shall undergo a full re-evaluation of its baseline, additionality, and all procedures and assumptions for quantifying, monitoring, and verifying mitigation outcomes. This includes reassessment of the baseline scenario, methodologies, parameters, and applicable regulations.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard applies the same procedures to all activities, including those that exceed the allowable interval between verification events. As per Section 22.5 of the [BCR Standard](#) (Verification Frequency Requirements), verifications must occur at least once every five (5) years for AFOLU activities and every three (3) years for non-AFOLU activities.

Activities that do not meet these timelines must still undergo full verification under standard procedures. Emission reductions generated during unverified periods may be deemed ineligible for crediting unless a justified exception is approved by BioCarbon.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard supports only ex-post issuance of carbon credits. Verified Carbon Credits (VCCs) are issued exclusively after the mitigation outcomes have been fully monitored and independently verified by an accredited CAB (BCR Standard, Section 12.4). No ex-ante units are issued under the [SOP](#) (Section 16.4, Issuance Procedures).

Section 9.1.1 (*Ex-post credits issuance*) of the [Avoiding Double Counting Tool](#) refers that GHG projects can be requested only once the validation process has concluded. This means that BioCarbon has established clear rules and procedures during its validation and verification process for issuance of "ex-post" VCC.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires all Conformity Assessment Bodies (CABs) to be accredited by an Accreditation Body that is a signatory to the IAF Multilateral Recognition Arrangement (MLA). Accreditation shall be based on ISO 14065 and ISO/IEC 17029 ([BCR Standard](#), Section 23). CABs shall also demonstrate

conformance with relevant sectoral scopes and competence requirements, as outlined in the [Validation and Verification Manual](#) (Section 8).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_validation-and-verification-manual.pdf

Section 8.1 (General Requirements) of the [Validation and Verification Manual](#) set that CABs shall be subject to regular performance reviews and audits by BioCarbon, as set forth in the *Performance Evaluation Manual for CABs*.

Per Section 7 (*Approval and Periodic Review of CABs*) and Section 8 (*Performance Evaluation Criteria*), BioCarbon conducts regular reviews through document audits, field observations, interviews, and non-conformity tracking. The evaluation covers accreditation validity, technical competence, independence, and application of approved procedures.

As stated in Section 11 (*Sanctions, Suspension and Revocation*), BioCarbon may impose corrective actions, suspend, or revoke a CAB's approval in response to poor performance. Section 8.4 (*Non-Conformity Management*) confirms that unresolved or repeated findings trigger escalating actions, and Section 7.2 (*Duration and review of Approval*) provides for notification of underperformance to the relevant accreditation body.

Confidential Information Submitted

o Performance Evaluation Manual for CABs

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 10 (Methodological documents) of the [BCR Standard](#) signals that the program is supported by a set of approved methodological documents that define the procedures for quantifying and monitoring GHG emission reductions, avoidance or removals at the project level.

The BioCarbon Standard includes [methodological documents](#) and [tools](#) that define applicability criteria and provide step-by-step guidance for the quantification, monitoring, and reporting of GHG emission reductions or removals across project types. All projects shall apply eligible methodologies in full, along with any associated tools or data sources, and comply with the overarching BioCarbon Standard requirements.

To date, publicly available methodologies include:

AFOLU Sector:

- o [BCR0001 Afforestation, Reforestation, and Revegetation](#)
- o [BCR0002 REDD+ Projects](#)
- o [BCR0003 Activities that prevent land use change and improve management practices for peatlands and other wetlands in high mountain ecosystems](#)
- o [BCR0004 Activities that avoid land use change in continental wetlands](#)
- o [BCR0005 Activities that prevent land use change in natural savannas](#)
- o [BCR0007 Conservation and restoration of natural continental wetlands](#)
- o [BCR0009 SOIL ORGANIC CARBON \(SOC\) stock increase by adding high organic content from anaerobic digestate](#)

Other sectors (CDM methodologies):

- o [Energy](#)
- o [Transport](#)
- o [Waste](#)
- o [BCR0008 Biomethanisation Plants Animal Manure Management for Renewable Energy, Heat Generation, and CH₄ & N₂O Mitigation](#)

Public tools and guidelines include:

- o [Identification of a baseline scenario and demonstration of additionality](#)
- o [Permanence and risk management](#)
- o [Monitoring, Reporting and Verification \(MRV\)](#)
- o [Sustainable Development Goals \(SDGs\)](#)
- o [Safeguards REDD+](#)
- o [Sustainable Development Safeguards \(SDSs\)](#)
- o [Biodiversity Toolbox for Continental Wetlands](#)
- o [Avoiding Double Counting](#)

BioCarbon also has a public tool for the development and approval of new methodologies: [BioCarbon Methodologies-development-and-approval](#)

All methodologies and tools are accessible at: [Tools & Guidelines](#) and [Methodologies — BioCarbon Standard](#).

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

The [Methodology Development and Approval](#) informs detailed and precise orientation for developing other methodologies and protocols, considering pivotal elements regarding integrity, objectivity, and technical robustness.

The development of new methodologies may occur when:

- a) “A GHG project that has potential additional characteristics is not included within the types of activities

and sectors applicable to existing BCR methodologies, and

- b) There is no methodology within the CDM applicable to the type of activity. During the evaluation process, it must be demonstrated:
- a. That the methodology includes all the components required by the applicable Standard (such as additionality, alignment with SDG, Baseline or reference scenario, among others described in the [BCR Standard](#))
 - b. The methodology applies the principles of BCR and principles of Certification and Registration.
 - c. That the methodology meets the applicable legal requirements.
 - d. That the methodology correctly references any method or equation defined by another organization.
 - e. The methodology offers clarity and presents the methods as a procedure to facilitate their understanding and application.
 - f. The methodology defines the quantification parameters and provides other relevant definitions for its application.
 - g. That the methodology establishes the scope of the application.
 - h. That the methodology is not contradictory with the requirements established in the BCR Standard that applies.
 - i. The methodology is relevant to the development context of the country and is aligned with the national development plan.
 - j. That the quantification methods of the methodology include the determining parameters for the quantification of tons of CO₂-e according to the type of activity, that a scientific and investigative organization endorses the sources or references of the quantification methods, and that after conducting a pilot quantification exercise, the mitigation results are verifiable and consistent.

BioCarbon informs about the steps and requirements for submitting MDI (Methodology Development Intention) by Third Parties and disclosing approval steps before publishing the final version on the BCR website. Other elements regarding the team's expertise involved in the process and the timeline are presented in [Methodology Development and Approval](#).

Also, sections process of public consultation, external review, evaluation by BioCarbon, methodology approval, and timeline are described in sections 6.4, 6.5, 6.6, and 6.7. A summary of the steps is displayed in section 6.8.

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf

The BioCarbon Standard has a defined process for developing and updating methodologies. New methodologies may be developed internally or proposed by external entities and shall undergo internal review, public consultation, and approval by the Technical Committee. Existing methodologies are reviewed at least every five years, or earlier if triggered by scientific updates or stakeholder input.

Section 7 (*Need for Methodological Development*) of the MD&A describes the steps and estimated timeline for developing new methodologies.

Section 15.3.1 (*Development of Methodologies*) of the [SOP](#) outlines the conditions under which new methodologies can be proposed and approved.

When a need is identified, a draft is developed, approved by Management and the Technical Committee, then opened for 30 days of public consultation. After incorporating feedback, the methodology undergoes a final review and approval.

Section 10 (*Methodological Documents*) of the BCR Standard covers updates to existing methodologies.

Revisions may occur at any time based on scientific evidence, with a maximum interval of five years. Updated versions are issued with new version numbers.

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

Regarding the development of methodologies, BCR has a Guidance Development of Methodologies, which refers to the steps necessary for methodologies review and approval and the estimated timing for each. See more details in the tool [methodologies development and approval](#).

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf

The MD&A document provides the elements and procedures for developing and evaluating methodologies, including procedures for reviewing and approving methodological documents and tools that ensure the conditions set by BioCarbon, consider best practices and ensure the scientific and technical basis needed for

climate action and the carbon markets.

The development and approval of the methodologies include a review process to assess the consistency of the methodological developments with the BioCarbon Standard to meet the requirements for quality, integrity, and transparency in the development of methodologies at BioCarbon.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard is supported by a series of approved methodologies, defining the procedures for quantifying and monitoring GHG emission reductions; all VCCs will be based on those methodologies (BCR Standard, Section 10), conservative assumptions, and validated monitoring plans ([Methodology Development and Approval Manual](#), Section 6).

Methodologies are aligned with IPCC and ISO guidance (BCR Standard, Section 23) and include procedures for addressing uncertainty, leakage, and permanence. All results shall be verified by an accredited CAB before issuance ([Validation and Verification Manual](#) Section 7).

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.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires monitoring, measurement, and reporting throughout the quantification period, following the validated Monitoring Plan (BCR Standard, Section 21).

Monitoring reports are submitted for third-party verification at least every five years for AFOLU and every three years for non-AFOLU activities (BCR Standard, Section 22.5). The MRV Tool ensures consistent, conservative, and scientifically robust quantification and reporting of mitigation results.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf

Section 11 (*Methodological Review, Revision and Retirement*) of the MD&A document indicates that methodologies developed and/or approved by BioCarbon can be reviewed and updated considering scientific elements that indicate and justify the need for updating methodological documents.

The maximum time period for a methodological revision is five years. However, BioCarbon's Technical Committee may address the need for revision or update at any time. A new methodology version number is created for BioCarbon Revisions.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf.

The BioCarbon Standard’s methodologies and program provisions address all crucial components required for robust GHG crediting, including eligibility, boundaries, additionality, baseline, quantification, and monitoring, ensuring consistent application and environmental integrity across all activity types:

- o Applicability or eligibility criteria: All BioCarbon Methodologies; MD&A, Section 6;
 - o Accounting boundary: All BioCarbon Methodologies; MD&A, Section 6;
 - o Determination of additionality: Additionality Tool; [BCR Standard](#), Section 11.6; MD&A, Section 6
 - o Baseline scenario: BCR Standard v4.0, Section 12.2; MD&A, Section 6.1;
 - o Quantification of GHG emission reductions or removals: BCR Standard, Section 12; MD&A, Section 4 and 8.1.4;
 - o Monitoring practices: [SOP](#), Section 15.3 and 16; BioCarbon Methodologies; MD&A, Section 4, 6 and 9
- These elements are systematically required to ensure scientific rigor, environmental integrity, and consistency with the BioCarbon Standard.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf.

Yes. BioCarbon requires that all new methodologies and major revisions undergo both independent expert review and public stakeholder consultation prior to approval.

According to Section 8 (*Overview of methodology development process*) of the MD&A document:

- o As detailed in Section 8.2 (*Public Consultation*), all draft methodologies shall undergo a 30-day public consultation period after internal review and clearance by the Directorate and a delegate of the Technical Committee.
- o Following the consultation, as stated in Section 8.3 (*External Review*), the draft methodology and all stakeholder comments are reviewed by an independent external reviewer, who shall be selected by BioCarbon based on criteria included in the Terms of Reference.
- o The final methodology is only approved by the Board after verifying that public comments have been addressed and the external review has been satisfactorily resolved (see Section 8.5, *Methodology approval*).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf.

The BioCarbon Standard has procedures to review, suspend, or withdraw the use of methodologies when justified. Section 11 of the MD&A establishes that methodologies may be revised or withdrawn when there is evidence that GHG emission reductions/removals are overestimated or additionality is not ensured. The process is led by the Technical Committee and decided by the Board of Directors.

5.2 Requirements for Quantifying GHG Emission Reductions or Removals - CORSIA

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard has procedures to ensure that carbon credits are issued against realistic, defensible, and conservative baseline estimations. These procedures are detailed across multiple documents:

- o BCR Standard, Section 12.2 establishes that the baseline scenario shall be based on a realistic and credible projection of emissions or removals in the absence of the mitigation activity, using conservative assumptions and relevant historical data;
- o [MD&A](#), Section 6.1. requires that the baseline scenario reflects conservative assumptions, is consistent with sectoral context and policy conditions, and avoids any overestimation of mitigation results;
- o Additionality and Baseline Tool, Section 5, requires the selection of a conservative baseline scenario that reflects what would have occurred in the absence of the project.
- o [SOP](#), Section 16.3 mandates that the CAB shall conduct a comprehensive assessment of GHG Projects, including the use of appropriate methodologies, baseline identification (credible, reliable) and additionality assessment.

Together, these provisions ensure that baselines are not overestimated and that any emissions reductions claimed are real, additional, and conservatively estimated.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires public disclosure of baseline scenarios, key assumptions, and parameters used in project quantification.

BCR Standard (Section 12.2.): Baselines shall be based on defensible methods such as historical data, sectoral benchmarks, or modeled projections, using transparent and conservative assumptions that do not overestimate mitigation. The baseline shall be established conservatively, reflecting the most credible scenario of emissions or removals in the absence of the project. All assumptions, parameters, data sources, and justifications shall be transparently documented and publicly disclosed.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_additional.pdf

According to the [BCR Standard](#) (Section 11.6), the project holder shall ensure that all verified carbon credits represent emission reductions, removals, or avoidance are additional. All assumptions and values shall avoid overestimation and reflect realistic, transparent, and evidence-based conditions.

As stated in the BioCarbon [Additionality Tool](#) (Section 3), all projects developed under the BioCarbon Standard shall demonstrate and document that baselines are established using realistic and conservative assumptions, parameters, and models. The use of historical data, benchmarking, or modelling shall reflect conditions that would plausibly occur in the absence of the mitigation activity and shall not result in the overestimation of emission reductions or removals.

Additionally, the BioCarbon's [Conservative Approach and Uncertainty Management Tool](#) aims to ensure that all reported mitigation outcomes are based on conservative and transparent assumptions, supported by data and methods appropriate to the context of each project.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

BioCarbon Standard (Section 12.2.1) requires that baseline scenarios be reassessed or updated if significant changes occur during the quantification period that were not anticipated at the time of registration. Such changes may include new laws or regulations, shifts in market conditions, the widespread adoption of best available technologies, or policy interventions. Project holders shall monitor for such changes and report them to BioCarbon. Where appropriate, the baseline may be updated to ensure the continued environmental integrity and conservativeness of the credited mitigation outcomes.

Particularly, BioCarbon requires a periodic reassessment of the baseline scenario to ensure its continued validity and

alignment with current circumstances. For AFOLU activities, baseline scenarios shall be reassessed and updated at least every five (5) years. For other sectors, this reassessment shall occur at least every seven (7) years. This reassessment includes evaluating whether the initial conditions, barriers, and assumptions used to define the baseline still prevail, and updating all relevant parameters and methodological elements accordingly. These requirements are established in section 12.2.1 of the BCR Standard and help safeguard the conservativeness and credibility of emission reductions or removals credited under the BioCarbon Standard.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard (Section 11.1) supports mitigation activities across four sectors, AFOLU, renewable energy, energy efficiency, transport and waste management.

Among these, AFOLU activities, particularly ARR, avoided deforestation, avoid forest degradation, and land-use practices in strategic ecosystems and biomass energy, present risk of material emissions leakage, including activity-shifting, market, and natural or ecological leakage.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard (Section 12.3.1) that all mitigation activities assess and address potential leakage in a conservative and transparent manner. Specifically, the BCR Standard.

Also, the BioCarbon methodologies include requirements include a procedure for identifying, assessing and conservatively quantifying leakage emissions resulting from the implementation of the project activity, ensuring that all significant indirect sources of emissions are accounted for (Section 6, [MD&A](#) and Section 12, BCR Standard).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard only allows for the implementation of mitigation activities at the project level. However, to ensure environmental integrity, the program requires that all projects that represent a risk of material leakage include robust measures to identify, assess, and mitigate such risk (BCR Standard, Section 12.3.1). These requirements are systematically applied at the project level across all relevant methodologies approved under the BioCarbon Standard.

Therefore, while BioCarbon does not operate at the national or subnational scale, its provisions ensure that project-level activities with potential leakage risks are implemented with appropriate safeguards to prevent and mitigate material leakage.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Under the BioCarbon Standard, mitigation activities that represent a risk of material leakage are required to monitor identified leakage sources throughout the quantification period (BCR Standard, Section 12.3.1) and [MD&A](#) (Section 6) and [MRV Tool](#) (Section 14).

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Monitoring-reporting-and-verification.pdf

The BioCarbon Standard requires that all approved methodologies include provisions for the deduction of emissions

from any identified material leakage that reduces net GHG mitigation benefits. Specifically, the MRV Tool establishes the following requirement (Section 10):

"All methodologies shall require project holders to identify and assess all material sources of leakage that may result from the implementation of the mitigation activity. Where applicable, methodologies shall establish procedures for the ex-post quantification of leakage emissions during each monitoring period."

"Methodologies shall also require that all emissions from identified material leakage that reduce mitigation benefits be deducted from the net GHG benefits in a conservative manner, in accordance with the applicable calculation approach defined in the methodology."

These provisions ensure that material leakage is not only assessed and monitored, but also fully accounted for through conservative deduction from credited emission reductions, in line with ICVCM requirements.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BCR Standard clearly defines a carbon credit as one metric tonne of CO₂ equivalent of GHG emission reductions or removals.

As stated in Annex A — *Glossary of Terms* of the BCR Standard, a Carbon Credit is defined as a "Measurable and tradable unit, accounted for a GHG Project. When verified and listed in the registry system of BioCarbon, it is called a Verified Carbon Credit (VCC). It is equivalent to one metric ton of carbon dioxide equivalent reduced or removed."

This definition ensures full alignment with integrity requirements regarding the unit definition of a carbon credit.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_methodologies-development-and-approval.pdf

The BioCarbon Standard requires that all approved methodologies explicitly disclose the Global Warming Potential (GWP) values used to convert non-CO₂ gases into CO₂ equivalent.

This requirement is established in the Methodology Development and Approval Document (MD&A), under the section on GHG Quantification Requirements (Section 6)

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 11.5 of the BCR Standard describes the requirements related to project length and quantification periods. It specifies that project proponents shall define the overall project duration as well as the length of each quantification period. It also establishes that emission reductions or removals shall be quantified ex post, at intervals consistent with the quantification period, and in accordance with the applicable methodology.

These provisions ensure that the duration of crediting and monitoring is clearly defined, and that GHG emission reductions or removals are measured and verified within appropriate and transparent timeframes.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 11.5.1 of the BCR Standard provides procedures for the renewal of quantification periods. It requires a reassessment of the baseline scenario, including whether the original conditions and barriers still prevail, and mandates the update of relevant parameters used to calculate emission reductions or removals (BCR Standard, Section 12.2.1). The updated Project Document shall be submitted for validation against the current BCR Standard.

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

<https://biocarbonstandard.com/wp-content/uploads/Conservative Approach and Uncertainty Management tool.pdf>

The BioCarbon Standard requires project holders to assess the overall uncertainty of emission reductions or removals using the BioCarbon Uncertainty Management Tool. This tool (Section 9) identifies and addresses all relevant sources of uncertainty, including baseline assumptions, estimation equations or models, parameters (e.g., representativeness of default values), and measurements (e.g., accuracy of field methods).

It also provides a structured approach for calculating the combined uncertainty from individual sources (Section 10). These requirements are supported by the [BCR Standard](#) (Section 12), which mandates that uncertainty be evaluated and transparently reported as part of the quantification process.

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

Yes

<https://biocarbonstandard.com/wp-content/uploads/Conservative Approach and Uncertainty Management tool.pdf>

The BioCarbon Standard applies a systematic approach to ensure conservativeness in all approved quantification methodologies and tools. The [Methodology Development and Approval Manual](#) (Section 6) requires the use of conservative assumptions, parameters, and models to avoid overestimation of mitigation outcomes.

The [BioCarbon Additionality Tool](#) (Section 7) reinforces this requirement for baseline development. In addition, the Uncertainty Management Tool (Section 10) requires the aggregation of uncertainty components and the application of conservative adjustments when thresholds are exceeded. All methodologies are reviewed by the Technical Committee and subject to public consultation prior to approval.

In this context, the BioCarbon Standard includes a conservative approach that ensure conservativeness of quantification or reductions and removals of GHG, in the framework of the methodological documents approved.

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

https://biocarbonstandard.com/wp-content/uploads/Baseline_additionality_tool.pdf

The BioCarbon Additionality Tool (Section 7) requires that baseline scenarios consider applicable government policies and legal requirements that reduce GHG emissions, where such policies are enforced in the project context. It also

allows for the consideration of the level of enforcement and any formally recognized grace periods. This ensures that baselines reflect realistic emissions levels and do not credit legally required mitigation.

5.3 Ex-Post Determination of Emission Reductions or Removals

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard only supports ex-post issuance (BCR Standard, Section 12.4 and Section 21). Verified Carbon Credits (VCCs) are issued exclusively after emission reductions or removals have been fully monitored and independently verified ([SOP](#), Section 16.6). No ex-ante credits are issued.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard includes provisions to ensure that no mitigation activity is registered under BioCarbon if it is simultaneously active under another carbon crediting program (BCR Standard, Section 26).

The registry system requires project holders to declare whether the activity has been registered elsewhere. If so, a formal proof of withdrawal shall be submitted before proceeding. As part of the due diligence process, the Technical Committee verifies that any project migrated from another program has been effectively cancelled or withdrawn from the originating registry, in line with the procedures outlined in the [Avoiding Double Counting](#) (ADC Tool, Section 9.1.4).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard has procedures to ensure that no Verified Carbon Credits (VCCs) are issued for emission reductions or removals already credited under another program. As established in the [ADC Tool](#) (Sections 9.1.4 and 9.2.3), project holders shall disclose any prior issuance of credits and, where applicable, provide proof of cancellation of those units to prevent double issuance.

In addition, the CAB shall assess the GHG Program registries and declare if the project, or areas in AFOLU sector, are not in another program (registry). BioCarbon technical committee review the assessment carried out by the CAB.

Futhermore, the Technical Committee reviews project status and credit history to ensure that credits issued under BioCarbon do not duplicate those issued elsewhere, as reinforced in the BCR Standard.

6.2 No Double Use

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The Global CarbonTrace registry prevents any further transfer, retirement, or cancellation of a Verified Carbon Credit (VCC) once it has been retired or cancelled (BCR Standard, Section 26).

The system applies automated restrictions based on the unit's status and tracks all transactions through immutable blockchain records to ensure that retired or cancelled credits cannot be re-used. As described in [SOP](#) (Section 22).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Project holders shall apply the *Sustainable Development Safeguards (SDSs) Tool* and demonstrate that their activities do not cause harm to the environment or the communities. This includes identifying and addressing any potential risks and impacts related to environmental and socio-economic safeguards, as outlines in Section 15 (*Sustainable Development Safeguards (SDSs)*) of the BCR Standard.

The SDS Tool is used to:

- Assess potential negative environmental and social impacts of the mitigation activity in relation to criteria 7.2 to 7.8 and additional safeguards defined in the BCR Standard;
- Identify any imminent risks or expected negative impacts; and
- Define appropriate measures to reduce the likelihood and severity of such risks or, if unavoidable, to minimize their impact.

In addition, Section 8 (Governance and Compliance) requires projects to assess risks linked to governance and best practices while:

- Ensuring transparency and accountability in project decision-making processes;
- Upholding ethical business practices and adhere to all applicable laws and regulations
- Collaborating with relevant stakeholders to incorporate diverse perspectives; and,
- Reporting on sustainability performance, providing stakeholders with transparent and accurate information.

2) Confirm that your program uses sustainable development criteria

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 17 (*Sustainable Development Goals (SDGs)*) of the BCR Standard establishes that GHG Project holders seeking registration with BioCarbon shall assess and demonstrate how their project contributes to the United Nations Sustainable Development Goals.

Project holders shall demonstrate their project's contributions to the SDGs by completing the SDGs Tool spreadsheet, which is publicly available on [BioCarbon's website](#), in accordance with the accompanying [SDGs tool guidelines](#).

In the *SDSs tool*, specifically in *Annex A: SDS Assessment Questionnaire* project holders are required to assess each safeguard based on their project context, identify potential risks, and respond to a structured set of questions. These responses shall include justifications and, where applicable, describe mitigation or preventive measures proportionate to the level of risk identified.

The SDSs Tool categorizes responses as follows:

- Yes — A risk or impact is present and relevant. The proponent shall describe mitigation measures to reduce severity or likelihood and include supporting evidence. These actions shall be incorporated into the Monitoring & Reporting Plan and followed up in subsequent monitoring periods.
- Potentially – A risk may arise during the project lifecycle. Justification is required, and the issue shall be reviewed and updated in each monitoring report.
- No – No risk or impact is identified. Justification shall be provided, with evidence where appropriate.
- N/A – The safeguard is not applicable. No action is required.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BCR Standard (Section 21, *Monitoring Plan*) requires project holders to include a Monitoring Plan in the Project Document (PD). This plan shall detail the procedures for assessing how the project's activities contribute to the Sustainable Development Goals (SDGs).

During the verification process, project holders shall complete Section 4: *Contribution to Sustainable Development Goals (SDGs)* of the Monitoring Report (template available on BioCarbon's website [here](#)). This section shall include:

- A brief description of the project activities implemented during the monitoring period that contribute to the SDGs;
- A description of how these activities align with nationally stated sustainable development priorities and the associated monitoring and reporting provisions, and
- The monitoring procedures used to track the SDG-related activities, in accordance with the BCR Standard requirements, the SDG Tool guidelines, and the registered GHG Project Document.

The *SDG tool* supports project holders in identifying appropriate measurement units to monitor and report on SDG-related activities, and to link supporting evidence to each activity. It also guides the inclusion of a detailed description of the activities, their contributions, and relevant regional and local context.

Moreover, the *SDG Tool* is integrated into the validation and verification process carried out by the Conformity Assessment Body (CAB), as outlined in the Validation and Verification Manual. CABs are required to verify the projects' SDG contributions in both the short and long term, based on the project's time frame and designated verification periods.

7.1 Assessment and Management of Environmental and Social Risks

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

https://biocarbonregistry.com/standard/BCR_Standard_en.pdf

Section 11.7 (*Compliance with Laws, Statutes and Other Regulatory Frameworks*) of the BCR Standard, requires mitigation activity holders to demonstrate that their project comply with all applicable local, regional, and national laws and regulations, including those specifically related to project activities.

Legal compliance shall also cover, among other areas, laws and international frameworks related to the protection of human rights and the rights of Indigenous Peoples. This includes, but is not limited to:

- The United Nations Declaration on the Rights of Indigenous Peoples;
- ILO Convention 169 on Indigenous and Tribal Peoples;
- The ILO Declaration on Fundamental Principles and Rights at Work (1998);
- The Universal Declaration of Human Rights (1948)
- The Women's Empowerment Principles (WEPIs);
- The 10 Principles of the United Nations Global Compact, and
- The Rio Declaration on Environment and Development (1992).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Project holders shall apply the *Sustainable Development Safeguards (SDSs) Tool* and demonstrate that their activities do not cause harm to the environment or the communities. This includes identifying and addressing any potential risks and impacts related to environmental and socio-economic safeguards, as outlined in Section

15 (*Sustainable Development Safeguards (SDSs)*) of the BCR Standard.

The SDS Tool is used to:

- Assess potential negative environmental and social impacts of the mitigation activity in relation to SDS Tool's and additional safeguards defined in the BCR Standard;
- Identify any imminent risks or expected negative impacts; and
- Define appropriate measures to reduce the likelihood and severity of such risks or, if unavoidable, to minimize their impact.

Specifically, the SDS Tool provides a framework for assessing risks associated with the following safeguards, which include and go beyond criteria 7.2 to 7.8:

- a. Resource Efficiency and Pollution Prevention and Management, including land use;
- b. Water;
- c. Biodiversity and ecosystems protection;
- d. Climate Change.
- e. Labor rights and Working Conditions;
- f. Gender equality and women empowerment;
- g. Land acquisition, Restrictions on Land Use, Displacement, and Involuntary Resettlement;
- h. Respect for human rights and inclusive stakeholders' engagement;
- i. Protection of Indigenous Peoples and Local Communities' cultural heritage;
- j. Community and Health and safety;
- k. Corruption; and
- l. Economic Impact, including transparent benefit-sharing arrangements.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BCR Standard mandates *Free, Prior, and Informed Consent (FPIC)* and inclusive stakeholder engagement throughout the project cycle.

1. FPIC Requirements - Section 13: *Carbon Ownership and Rights*

FPIC is required where projects are on Indigenous or local community lands or use their resources. Key provisions include:

- FPIC shall follow national law and international standards.
- Consultation is not a one-time event; it shall be reviewed annually to maintain Indigenous sovereignty and informed participation.
- The process shall align with community-defined timelines and governance, ensuring the participation of women and vulnerable groups.
- Projects shall establish clear carbon rights agreements, fair benefit-sharing, and culturally appropriate communication.

2. Stakeholder Consultation and Engagement - Section 16: *Stakeholder Engagement and Consultation*

Stakeholder consultation shall:

- Begin in early design phases, include participatory decision-making, and respect local knowledge.
- Be gender-responsive and adapted to local languages and customs.
- Occur before validation and include affected local representatives and authorities.
- Use accessible tools (translations, visuals) and be documented in a *Stakeholder Engagement Report* available in the registry.
- Address all feedback—adapting the project if needed or justifying why changes were not made.

3. Stakeholder Consultation and engagement – Sections 16

Project holders shall:

- Maintain accessible communication channels and regularly document stakeholder input.
- Provide a Grievance Mechanism that is transparent, confidential, culturally appropriate, and reviewed at least every three years.
- Ensure mechanisms prevent retaliation and offer independent mediation if needed.

The grievance procedure shall be in project documents and shared with all IPs and LCs. Additionally, stakeholders may use BioCarbon's [Ethics and Compliance Channel](#) to report concerns.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

In the *SDSs tool*, specifically in *Annex A: SDS Assessment Questionnaire* project holders are required to assess each safeguard based on their project context, identify potential risks, and respond to a structured set of questions. These responses shall include justifications and, where applicable, describe mitigation or preventive measures proportionate to the level of risk identified.

The SDSs Tool categorizes responses as follows:

- Yes — A risk or impact is present and relevant. The proponent shall describe mitigation measures to reduce severity or likelihood and include supporting evidence. These actions shall be incorporated into the Monitoring & Reporting Plan and followed up in subsequent monitoring periods.
- Potentially – A risk may arise during the project lifecycle. Justification is required, and the issue shall be reviewed and updated in each monitoring report.
- No – No risk or impact is identified. Justification shall be provided, with evidence where appropriate.
- N/A – The safeguard is not applicable. No action is required.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

As established in Section 21 (*Monitoring Plan*) of the BCR Standard, project holders are required to include in the Monitoring Plan and report detailed information on measures implemented to address environmental and social risks identified through the *Sustainable Development Safeguards (SDS)* Tool. This includes:

- Actions taken to mitigate or prevent identified risks;
- Results of those measures;
- Procedures for ongoing monitoring, verification, and quality control related to safeguards.

7.2 Labour Rights and Working Conditions

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

1) provides safe and healthy working conditions for employees.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

As outlined in Section 7.1.1 (*Labor rights and Working Conditions*) of the Sustainable Development Safeguards Tool (SDS Tool), project holders shall provide safe, healthy, and fair working environments. In addition, Section 7.1.5: Community Health and Safety requires measures to:

- Anticipate and prevent health and safety risks to workers and communities;
- Ensure safe design and construction of infrastructure;
- Minimize exposure to hazards, diseases, or disasters;
- Safeguard personnel and property in line with international human rights standards;
- Implement effective emergency response protocols.

Through the *SDS assessment (Annex A)*, project holders shall evaluate potential risks, such as unsafe working conditions, inadequate safety measures, insufficient welfare benefits, or gender-specific health risks. Where risks are

identified, mitigation and prevention measures shall be implemented, and the assessment shall be updated regularly to ensure ongoing safety throughout the project lifecycle (SDS Tool, Section 5).

Additionally, all project holders are contractually bound to comply with BioCarbon's [Code of Ethics](#), which reinforces obligations related to labor rights, health and safety, community protection, and human rights, ensuring ethical and responsible project implementation.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

The BCR Standard, through the SDS Tool, explicitly requires project holders to promote fair labor practices, diversity, and inclusion among project teams and third-party workers. Section 7 (*Social*) and specifically Section 7.1.1 (*Labor rights and Working Conditions*) state that project holders shall ensure the right to work for all participants and collaborators, emphasizing the principles of voluntary employment, non-discrimination, and equal opportunity.

As part of the *SDS assessment (Annex A)*, project holders shall evaluate potential risks related to unfair treatment, including:

- Risk of discriminatory hiring or employment practices
- Unequal access to employment or training opportunities
- Forced or involuntary labor
- Gender-based or identity-based disparities in workplace conditions or benefits

Furthermore, all project holders are contractually bound to adhere to BioCarbon's Code of Ethics, which reinforces these commitments and ensures accountability for ethical and inclusive project implementation.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 7.1.1 (Labor rights and Working Conditions) of the SDSs Tool aligns with ILO principles, including the elimination of all forms of forced or compulsory labor and the effective abolition of child labor.

As part of the SDS Tool (Annex A), project holders shall assess and justify their responses to key risk questions, including:

- Could the project involve or lead to forced labor or human trafficking?
- Could the project or its supply chain result in child labor or exploitative practices?
- Could contracted or migrant workers face exploitation or lack of adequate protections?

Where risks are identified, project holders are required to implement proportionate mitigation and prevention measures. These shall be monitored and updated throughout the project lifecycle, as outlined in Section 5 of the SDS Tool.

Additionally, all project holders are contractually bound to comply with BioCarbon's Code of Ethics, which reinforces obligations related to labor rights, health and safety, community protection, and human rights, ensuring ethical and responsible project implementation.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The validated project document (PD) shall include a dedicated section on Sustainable Development Safeguards (Section 8), where project holders confirm adherence to environmental and social safeguards or detail the measures taken to address identified risks, using the BioCarbon SDS Tool.

Additionally, Section 21 (Monitoring Plan) requires information for tracking the implementation and effectiveness of mitigation and preventive actions.

As per BCR Standard Section 22.3, Conformity Assessment Bodies (CABs) shall verify compliance with all safeguard requirements, including environmental and social assessments, during validation.

7.3 Resource Efficiency and Pollution Prevention

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 fertilisers**

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

As per SDS Tool (Section 6.1 and the table in the Annex), BioCarbon requires project holders to minimize pollution and hazardous impacts. Project holders shall:

- Prevent or reduce emissions to air, water, and soil;
- Mitigate noise, vibration, and discharges from project activities;
- Minimize waste generation and the use or release of hazardous materials, including pesticides and fertilizers.

Projects shall adopt technically and economically viable measures to reduce environmental and health risks and ensure efficient resource use.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 8 (*Sustainable Development Safeguards*) of the [GHG Project Template](#) mandates that project holders assess and document the environmental and social impacts of project activities. Where negative impacts are identified, project holders shall also demonstrate the application of mitigation measures using the BioCarbon [SDSs Tool](#).

In addition, Section 16 (*Monitoring Plan*) requires project holders to outline how these impacts will be monitored, and how mitigation and prevention actions will be tracked and verified over the project's lifecycle.

As per Section 22.3 (*Validation*) of the BCR Standard, CABs shall verify during validation that all relevant safeguard provisions have been addressed, including environmental and social impacts (Annex A: Sustainable Development Safeguards (SDSs) assessment questionnaire).

7.4 Land Acquisition and Involuntary Resettlement

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

The BioCarbon Standard requires project holders to disclose, in the validated Project Document, how land acquisition was conducted and to confirm that no involuntary resettlement occurred. As required in the Sustainable Development Safeguards (SDSs) Tool (Sections 7.1.3), land rights shall be lawfully obtained and documented, and any resettlement shall be voluntary or follow a formal compensation process. These elements are subject to third-party validation.

Project holders shall:

- Assess potential risks of displacement (physical or economic).
- Implement mitigation measures to prevent or reduce adverse impacts.
- Ensure compliance with national laws and international human rights standards, including ILO Convention

169 and the UN Declaration on the Rights of Indigenous Peoples.

- Respect Free, Prior, and Informed Consent (FPIC), particularly for Indigenous Peoples and vulnerable communities.

Annex A of the SDS Tool includes a detailed questionnaire addressing risks such as:

- Land rights conflicts or changes in ownership.
- Displacement from traditional lands or homes.
- Loss of livelihoods or inadequate compensation.
- Involuntary resettlement or lack of proper planning/support.

Project holders shall respond to each risk, justify their answers, and propose mitigation actions where risks are identified. Responses of "Yes" or "Potentially" require a clear plan for how the issue will be managed and monitored. This information and the evidence of compliance shall be included and justified in the Project Document (PD).

Additionally, Section 11.7 (Compliance with Laws, Statutes and Other Regulatory Frameworks) of the BCR Standard requires projects to comply with laws protecting human and Indigenous rights. These safeguards are mandatory for certification; non-compliance may result in denial or revocation of project registration.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

BioCarbon requires that validated project design documents confirm whether the mitigation activity may cause physical or economic displacement and describe measures taken to avoid or minimize such impacts.

The *Sustainable Development Safeguards* requires project holders to present the results of a social and environmental assessment, identifying and addressing any potential negative environmental or socio-economic impacts, including displacement. This shall be supported by up-to-date and reliable references, using the BioCarbon "Sustainable Development Safeguards (SDSs)" tool.

Section 21 (*Monitoring Plan*) of the BCR Standard further requires detailed information for ongoing monitoring, mitigation, and quality control related to the SDSs.

Additionally, as per Section 22.3 (*Validation*) of the BCR Standard, CABs shall verify that the project complies with all relevant provisions, including the assessment of environmental and social risks and the application of safeguards.

7.5 Biodiversity Conservation

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 6.3 (*Biodiversity and ecosystems protection*) of the *SDSs Tool* requires project holders to assess potential risks and negative impacts on terrestrial, freshwater, and marine biodiversity and ecosystems, including ecosystem services. The assessment shall consider both direct and indirect impacts of project activities.

The SDS Tool (Annex A) includes specific questions related to biodiversity and ecosystems.

If risks are identified, project holders shall implement mitigation and prevention measures to reduce their likelihood or severity. They are also required to:

- Periodically review and update the risk assessment throughout the project lifecycle; and
- Monitor implementation and track progress against defined indicators (SDS Tool, Section 5).

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 6.3 (*Biodiversity and Ecosystems protection*) of the SDS Tool establishes that project holders shall protect the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity, and shall not undertake any activities that could directly or indirectly impinge on these habitats. The identification of risks shall include both direct and indirect impacts, as well as residual risks, with particular attention to habitat loss, fragmentation, invasive species, overexploitation, and pollution.

As part of the SDS assessment (Annex A), project holders are required to evaluate whether project activities could: "Potentially entail or result in negatively impacting endangered or threatened species within the project area, either directly or indirectly through habitat changes or other disturbances."

If the response to this question is "Yes" or "Potentially", project holders shall take strict actions to completely avoid such risks. Minimization is not considered an acceptable alternative in these cases. Projects shall demonstrate how full avoidance will be ensured and sustained throughout the project lifecycle.

Additionally, the SDS Tool requires that all risk assessments, including those related to endangered species, be periodically reviewed and updated. This includes defining appropriate criteria and indicators for monitoring the implementation of safeguards and verifying the achievement of action-plan targets.

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

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

As included in Section 6.3 *Biodiversity and ecosystems* of the SDS Tool. BioCarbon requires that mitigation activities 'do not convert natural forest, grasslands, wetlands, or high conservation value habitats'.

4) minimises soil degradation and soil erosion.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section *Resource Efficiency and Pollution Prevention and Management, including land use of* SDS Tool, and the table in the Annex, requires project holders to assess and manage risks related to soil degradation and erosion.

As part of the detailed SDS assessment (Annex A), project holders shall address questions such as:

- Could the project activities result in land degradation or soil erosion, leading to the loss of productive land?
- Could changes in agricultural practices (e.g., intensive monoculture) cause soil degradation, biodiversity loss, or vulnerability to pests?
- Could the project disrupt natural drainage systems, increasing flood risks or erosion?

If any of these risks are identified, project holders shall implement mitigation and prevention actions to eliminate or reduce the risk and its impact. Additionally, assessments shall be periodically reviewed and updated throughout the project lifecycle, ensuring effective monitoring and implementation of corrective measures (Section 5, Scope and Applicability).

5) minimises water consumption and stress in the mitigation activity.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 6.2 (*Water*) of the SDS Tool requires project holders to ensure their activities do not negatively impact water access or quality. It also mandates the promotion of environmental sustainability in water-related ecosystems, such as rivers, aquifers, wetlands, and coastal and marine areas, while avoiding downstream impacts. Further, it states that, "The project or initiative holder should also consider water consumption, adopting measures to avoid or reduce water usage to prevent significant adverse impacts on people and the environment."

Annex A of the SDS Tool includes a detailed assessment of water-related risks. Project holders shall evaluate whether their activities could cause water scarcity, deplete resources, alter flows, or disrupt aquatic ecosystems. If such risks are identified, mitigation or impact-minimization measures are mandatory for certification.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

The validated project document (PD) includes a section on Safeguards where this information shall be detailed. The Section *Sustainable Development Safeguards (SDSs)* of the GHG Project Template requires project holders to present the results of their environmental and social assessment, including foreseeable impacts on biodiversity and ecosystems, supported by reliable, up-to-date references.

Section 15 of the BCR Standard states, "All safeguards shall be subject to independent validation and verification, in accordance with the procedures and criteria established in the BIOCARBON Validation and Verification Manual."

Project holders shall also demonstrate that activities do not negatively affect the environment or communities and shall identify and address any adverse environmental or socio-economic impacts using the BioCarbon *Sustainable Development Safeguards (SDS) Tool*.

Section 21 of the BCR Standard, the *Monitoring Plan*, further requires detailed information for monitoring activities, evaluating mitigation and prevention outcomes, and ensuring quality control of SDS-related data.

Additionally, as per Section 22.3 (*Validation*) of the [BCR Standard](#), Conformity Assessment Bodies (CABs) shall verify compliance with all applicable provisions, including the assessment of environmental, social, and sustainable development safeguards.

7.6 Indigenous Peoples, Local Communities and Cultural Heritage

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BCR Standard in its Section 11.7 (*Compliance with Laws, Statutes and Other Regulatory Frameworks*) states that project holders shall demonstrate compliance with all relevant laws and international frameworks, including "the laws related to the protection of human and indigenous peoples' rights, in accordance with international regulations, such as the United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169".

Moreover, Section 7.1.5 (*Protection of Indigenous Peoples and Local Communities' Cultural Heritage*) of [SDS tool](#), requires that project holders shall protect Indigenous knowledge for nature management, avoid adverse impacts on Indigenous communities and cultural heritage, and promote preservation of cultural values and traditions. In addition, *Free, Prior and Informed Consent (FPIC)* is recognized as a binding obligation under UNDRIP and is integrated into BioCarbon's requirements: "FPIC allows Indigenous Peoples to provide or withhold/withdraw consent, at any point, regarding projects impacting their territories... and to engage in negotiations to shape the design, implementation, monitoring, and evaluation of projects" (Annex B, SDS tool).

Furthermore, this is strengthened by the detailed assessment in Annex A of the SDS tool, which requires project holders to assess and protect the rights of IP & LCs, whereby they shall confirm that the mitigation activities do not violate IPs' rights to land, resources, governance, and culture; provide *Free, Prior and Informed Consent (FPIC)* before proceeding; respect Indigenous governance systems and decision-making; protect sacred sites and cultural identity, and ensure fair benefit-sharing with Indigenous communities. If any risk is identified, preventive or mitigation actions are required, and this is reviewed during certification (BCR Standard, Section 15).

2) identifies the rights-holders possibly affected by the mitigation activity (including customary

rights of local rights holders).

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 16 (*Stakeholder Engagement and Consultation*) of the BCR Standard further reinforces this requirement by mandating that project holders conduct a comprehensive stakeholder assessment. This includes identifying all individuals, groups, and organizations that may be affected by the project, particularly IPs, LCs, and those holding customary rights. The standard requires a documented list of potentially impacted stakeholders and clear evidence of their engagement, in line with principles of inclusion, transparency, and respect for rights.

Section 7.1.5 (*Protection of Indigenous Peoples and Local Communities' Cultural Heritage*) of the [SDS Tool](#) requires project holders to recognize and protect the rights, knowledge, and cultural heritage of IPs and LCs. It explicitly states that project holders shall identify stakeholders—including IPs, LCs, and customary rights holders—within and beyond the project area who may be impacted by the project. This includes the recognition of customary rights and ensuring that these stakeholders are not adversely affected by project activities.

3) when relevant to circumstances, has applied the FPIC process.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 7 (*Human rights*) of the SDS Tool requires project holders to identify all stakeholders potentially affected by the project, including IPs, LCs, and customary rights holders within and beyond the project area. This includes those with customary land or resource rights. Meaningful consultation, participation, and FPIC shall be ensured where applicable.

Section 7.1.4 of the SDS tool explicitly states that “project holders shall ensure inclusive, informed, and effective stakeholder engagement throughout the project lifecycle, in accordance with the principles of Free, Prior, and Informed Consent (FPIC) where applicable.”

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.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 7.1.5 (*Protection of Indigenous Peoples and Local Communities' Cultural Heritage*) of the SDS tool states that project holders shall not carry out force evictions or cause physical or economic displacement of IPs or LCs. Any such impacts shall be agreed upon through an FPIC process with the affected communities.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 7.1.5 (*Protection of Indigenous Peoples and Local Communities' Cultural Heritage*) of the SDS tool states that project holders are responsible for protecting and preserving IPs and LCs cultural heritage and ancestral knowledge aligned with UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage, ILO 169 Conventions and the UN's Declaration on the Rights of Indigenous Peoples.

As part of the detailed SDS assessment (Annex A), project holders shall address questions such as:

- Could the project/ activities potentially entail or result in losing sacred sites and cultural heritage, impacting the spiritual and cultural identity of indigenous communities?
- Could the project/ activities potentially entail or result in losing traditional economic practices and knowledge systems, potentially undermining cultural heritage and resilience to economic shocks in communities?

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

According to Section 15 of the [BCR Standard](#), the validated PD shall include the results of the *Sustainable Development Safeguards (SDSs)* assessment and any related mitigation or preventive measures in Section 8 (BioCarbon Template GHG Project), and as part of the Monitoring Plan. Projects holders are required to present and substantiate the environmental and social impacts, particularly on IPs and LCs, with reliable, up- to-date references, demonstrating that the project activities do not adversely affect communities or ecosystems.

Section 21 (*Monitoring Plan*) of the BCR Standard requires project holders submit a monitoring plan for validation that includes, among other things, detail regarding how these safeguards will be monitored and verified, including indicators for mitigation and prevention outcomes.

Additionally, Section 22.3 (*Validation*) of the [BCR Standard](#) requires Conformity Assessment Bodies (CABs) to validate compliance with Sustainable Development Safeguards provisions, including those related to IPs, LCs, and cultural heritage.

7.7. Respect for Human Rights, Stakeholder Engagement

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

1) avoids discrimination and respects human rights.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Section 15 (*Sustainable Development Safeguards (SDSs)*) of the BioCarbon Standard requires project holders to uphold and protect universal human rights and freedoms for all, as defined in the Universal Declaration on Human Rights (UDHR).

Therefore, project holders shall:

- Respect and promote human rights
- Avoid any form of discrimination
- Align with international standards such as the ILO, UN Guiding Principles on Business and Human Rights, and the Universal Declaration of Human Rights

As stated in Section 7 (Social) of the SDS's tool, project holders shall conduct a risk management to proactively take preventive actions addressing human rights and discrimination risks.

2) abides by the [International Bill of Human Rights](#) and universal instruments ratified by the host country.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

As stated in section 15 (*Sustainable Development Safeguards (SDSs)*) of the BCR Standard, project holders shall ensure that the mitigation, avoidance and remediation activities on any human right impact align with the International Bill of Human Rights and any other universal human rights instruments ratified by the host country.

Section 11.7 (*Compliance with Laws, Statutes and Other Regulatory Frameworks*) of the [BCR Standard](#), requires mitigation activity holders to demonstrate that their project comply with all applicable local, regional, and national laws and regulations, including those specifically related to project activities.

Legal compliance shall also cover, among other areas, laws and international frameworks related to the protection of human rights and the rights of Indigenous Peoples. This includes, but is not limited to:

- The United Nations Declaration on the Rights of Indigenous Peoples;
- ILO Convention 169 on Indigenous and Tribal Peoples;
- The ILO Declaration on Fundamental Principles and Rights at Work (1998);
- The Universal Declaration of Human Rights (1948)
- The Women's Empowerment Principles (WEPs);
- The 10 Principles of the United Nations Global Compact, and
- The Rio Declaration on Environment and Development (1992).

3) takes into account and responds to local stakeholders' views.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires project holders to engage and respond to stakeholders, as outlined in Section 16 (*Stakeholder engagement and consultation*) of the BCR Standard.

- Local Engagement (Section 16.1): Project holders shall consult IPs, LCs, and rights holders from the outset. Engagement shall be gender-responsive, culturally appropriate, in local languages, and documented in a *Stakeholder Engagement Report*, published in the registry.
- Public Consultation (Section 16.2): Projects shall undergo a 30-day public comment period at registration. Stakeholders can submit comments or request additional documents. Project holders shall respond to feedback by revising documentation or explaining why changes aren't needed. Conformity Assessment Bodies (CABs) verify this process.

Project holders shall also establish a Grievance Mechanism and share BioCarbon's Ethics and Compliance Channel (<https://canaletico.es/en/biocarbonstandard>) to ensure accessible and transparent communication with IPs, LCs, and other stakeholders.

Local engagement requirement is also reflected in Section 7.1.4 (*Respect for human rights and inclusive stakeholders' engagement*) of the SDS Tool in line to principle a. Engaging and collaborating with stakeholder's including Local Communities and Indigenous Peoples to understand and address their needs and concerns (Refer to Section 7, *Social*).

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

https://biocarbonregistry.com/standard/BCR_Standard_en.pdf

Validated project documents shall confirm adherence to safeguards. Per [BCR Standard](#) Section 22.1 (*Scope of validation and verification*), CABs verify compliance with these safeguards during validation.

BioCarbon Standard requires project holders to assess and report social and environmental impacts using the BioCarbon *Sustainable Development Safeguards (SDSs tool)*.

Section 16 (*Monitoring Plan*) ensures ongoing monitoring of safeguards implementation.

Finally, as stated in Section 15 of the BCR Standard, CABs shall verify during validation that the project complies with all applicable provisions, including the assessment of environmental and social safeguards.

7.8 Gender Equality

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

Yes. Section 7.1.2 (*Gender equality and Women Empowerment*) and Section 7.1.1 (*Labor rights and Working Conditions*) of the SDSs tool, requires project holders to address gender-related risks.

1) Section 7.1.2 of the SDG tool requires project holders to:

- Promote diversity, equality, and inclusion.
- Prevent discrimination and gender-based inequalities or harm.
- Ensure equal access to resources and project benefits.
- Conduct gender-sensitive analysis and enable equal participation in decision-making.
- Prioritize and empower marginalized and vulnerable groups.
- Identify and mitigate risks of gender-based violence and abuse linked to project activities.

- 2) Section 7.1.2 of the SDG tool requires project holders to:
 - Identify and mitigate risks of gender-based violence and abuse linked to project activities.
 - Appropriate response mechanism must be in place in case such incidents occur.
- 3) Section 7.1.2 of the SDG tool requires project holders to:
 - Promote equal access to and control over productive resources and program and project benefits (equal pay for equal work).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Sustainable_development_safeguards.pdf

The BioCarbon Standard requires project holders to confirm in the validated Project Document that the mitigation activity adheres to the applicable environmental and social safeguards or has implemented the necessary measures to address them. As established in the Sustainable Development Safeguards ([SDSs](#)) Tool, project holders shall assess risks, document mitigation measures, and demonstrate compliance during validation. This information is reviewed by accredited CABs and disclosed publicly, as required in Section 5.

Section 5 (*Scope of Applicability*) requires detailed information for monitoring project activities, mitigation outcomes, and quality control related to the SDSs assessment.

Finally, as stated in Section 15 of the [BCR Standard](#), CABs shall verify during validation that the project complies with all applicable provisions, including the assessment of environmental and social safeguards.

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.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 13 (*Carbon ownership and rights*) of the BioCarbon Standard requires project holders to establish fair, transparent benefit-sharing agreements with IPs and LCs, aligned with national laws and communicated in culturally appropriate ways.

In addition, as stated in the [SDSs Tool](#) (Section 7.3), the BioCarbon Standard requires project holders to include in the validated Project Document information on how benefit-sharing arrangements will be designed and implemented. These arrangements shall be appropriate to the local context, comply with national laws and regulations, and be presented in a form accessible to affected stakeholders.

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.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

As required by the BioCarbon Standard (Section 13, *Carbon ownership and rights*, *BCR Standard*) and the GHG Project Template, project holders shall confirm in the validated design document that both the draft and final benefit-sharing plans were shared with affected IPs and LCs in a form, manner, and language understandable to them, as part of the stakeholder consultation process.

3) make benefit-sharing outcomes that result from the benefit-sharing plan publicly available, subject to applicable legal restrictions.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

All safeguards under the BioCarbon Standard, including benefit-sharing arrangements, are subject to independent validation and verification in accordance with the Validation and Verification Manual.

The BioCarbon Standard requires that benefit-sharing outcomes resulting from the project's benefit-sharing plan be made publicly available, subject to applicable legal restrictions. This requirement is assessed as part of the validation and verification process.

Specifically, Section 7.1.2 and Section 8.1 (items s and t) of the *Validation and Verification Manual v3.0* establish that sustainable development safeguards and the project's contribution to sustainable development objectives (which include benefit-sharing mechanisms) are within the mandatory scope of validation and verification. This means that Conformity Assessment Bodies (CABs) are required to evaluate whether benefit-sharing plans are implemented as stated and whether their outcomes are disclosed transparently.

In addition, Section 9.7 requires documentation of findings related to safeguards and co-benefits in the validation or verification report, further reinforcing public accountability.

Compliance is assessed through evidence-based audits, including stakeholder consultations and review of supporting documentation. The results are made publicly available through the Global CarbonTrace registry, fulfilling the program's transparency obligations (BCR Standard, Section 15).

7.10 Cancun Safeguards

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](#).

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_tool-safeguards-redd.pdf

The BioCarbon Standard requires all REDD+ mitigation activities to be consistent with the Cancun Safeguards, as outlined in Section 18 (*REDD+ Safeguards*). BioCarbon provides a mandatory interpretation tool, REDD+ Safeguards Tool, which shall be applied by project holders and CABs during implementation, validation, and verification.

As stated in the BCR Standard (Section 18), if the host country has an official national interpretation of the safeguards, project holders shall comply with that as well.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_SDG-tool.pdf

The BioCarbon Standard requires project holders to demonstrate in the validated Project Document how the mitigation activity aligns with the Sustainable Development Goals (SDGs) of the host country. As stated in the [BCR Standard](#) (Section 17), project holders shall demonstrate how mitigation activities contribute to the SDGs, including alignment with the host country's SDG objectives where relevant and feasible.

The BCR Standard (Section 17) stipulates that: "Only units issued to projects that report their sustainable development contributions in accordance with the criteria defined by the BCR STANDARD shall be eligible for certification and issuance. These criteria include:

- (a) A defined list of indicators aligned with the United Nations Sustainable Development Goals (SDGs);
- (b) Additional indicators or national priorities formally recognized or adopted by the host country..."

It further requires that "Each project shall report how it contributes to at least three (3) SDGs and demonstrate that such contributions are context-specific and aligned with national or subnational development strategies." And that "These contributions shall be assessed during validation and verification in accordance with the Validation and Verification Manual."

According to the SDG Tool (Section 5) the CAB shall validate that the project holder has complied with the tool: "For the Validation/certification of the project/initiative the CAB shall provide an auditing report and determine whether the

project/initiative holder complies with the present tool and has completed Annex A.”

Additionally, Section 8.1 (*General requirements*) of the [Validation and Verification Manual](#) requires CABs to validate that the Project Document includes this assessment and to report on its consistency with the host country’s SDG objectives.

2) demonstrate, if applicable, through qualitative assessment how the mitigation activity delivers positive SDG impacts for certain SDGs (excluding SDG 13), if any.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_SDG-tool.pdf

The BioCarbon Standard requires project holders to assess and demonstrate how GHG Projects contribute to the SDGs Section 17 (*Sustainable Development Goals (SDG), BCR Standard*). This is further detailed in the SDG tool (Annex A), which mandates a qualitative assessment of SDG contributions through the [SDG excel tool](#).

The tool requires project holders to:

- Identify relevant SDGs connected to project activities;
- Describe qualitatively how the project activities contribute to those SDGs;
- Provide qualitative evidence such as training logs, stakeholder engagement, or contextual analysis.

The emphasis is on context-specific, narrative explanations that demonstrate positive development impacts aligned with the host country’s SDG objectives.

Additionally, Section 8.1 (*General requirements*) of the [Validation and Verification Manual](#) requires CABs to evaluate and validate the SDG contributions presented in the Project Document (PD), including how the mitigation activity demonstrates positive SDG impacts. These findings shall be included in the validation report, as required by Section 9.7 (*Documentation and Reporting*) of the Validation and Verification Manual.

3) provide information on any standardised tools and methods that were used to assess the SDG impacts.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_SDG-tool.pdf

The BioCarbon Standard provides a standardized SDG Tool that all projects shall use to assess and document their contributions to the Sustainable Development Goals. The tool includes indicators, scoring guidance, and qualitative justification requirements to ensure consistency and comparability across projects.

As required in Section 17 (*Sustainable Development Goals (SDG)*) of the BioCarbon Standard, project holders shall demonstrate how their GHG projects contribute to relevant Sustainable Development Goals (SDGs). To do so, they are required to apply the SDG Tool, including the [SDG excel form](#), a standardized assessment tool.

Additionally, Section 8.1 (*General requirements*) of the [Validation and Verification Manual](#) states that Conformity Assessment Bodies (CABs) shall verify the correct application of this tool and the project’s alignment with SDG objectives. These findings shall be reflected in the Project Document (PD) and included in the validation report.

D – CORSIA Requirements Related to ICVCM Category Assessment

8. Additionality Demonstration – CORSIA

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires that all Verified Carbon Credits (VCCs) represent GHG reductions or removals that go beyond any applicable laws, regulations, or legally binding mandates. As established in the [BioCarbon Additionality Tool](#) (Section 8), and [BCR Standard](#) (Section 11.6 and 13) project holders shall demonstrate that the mitigation activity is not legally required. This assessment is mandatory, subject to third-party validation, and documented in the Project Document.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard (BCR Standard, Section 11.6 and 22) requires that all emission reductions or removals exceed those that would occur under a conservative business-as-usual scenario.

BCR Standard (Section 22.1) requires confirmation of this during validation and verification. The BioCarbon Additionality Tool (Section 7) mandates that baseline scenarios be established using realistic and conservative assumptions, parameters, and models. This ensures that only mitigation outcomes beyond what would otherwise occur are credited.

3) Confirm that additionality and baseline-setting is assessed by an accredited and independent validation/verification entity.

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Under the BioCarbon Standard, both additionality and baseline scenario shall be assessed by an independent and accredited Conformity Assessment Body. The CAB shall be accredited under ISO 14065 and ISO/IEC 17029 by an IAF-recognized accreditation body ([BCR Standard](#) Section 23). Validation includes a detailed review of baseline assumptions and demonstration of additionality, as required in the BCR Standard (Section 22.3) and [Validation and Verification Manual](#) (Section 8).

4) Confirm that your program reviews additionality and baseline-setting.

Yes

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Standard_Operation_Procedures.pdf

The BioCarbon Standard conducts an independent review of the project’s additionality and baseline-setting as part of the registration process ([SOP](#), Section 16.3.2). The Technical Committee reviews the validation report and ensures the correct application of the Additionality Tool and applicable methodologies before approving the project for registration and issuance.

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)

https://biocarbonstandard.com/wp-content/uploads/Baseline_additionalilty_tool.pdf

The BioCarbon Additionality Tool applies the following methods to assess additionality:

- (a) Barrier analysis
- (b) Common practice / market penetration analysis
- (c) Investment and financial feasibility analysis
- (d) Legal or regulatory additionality analysis

All methods are described in the Additionality Tool v1.0 and shall be demonstrated with verifiable evidence.

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

N/A

No alternative procedures are applied. BioCarbon relies on internationally recognized approaches (barrier, regulatory, investment, and common practice) consistent with BCR Standard requirements.

7) Confirm whether your program designates certain mitigation activities as automatically additional (e.g., through a "positive list" of eligible project types).

No

https://biocarbonstandard.com/wp-content/uploads/Baseline_additionalilty_tool.pdf

The BioCarbon Standard does not designate any mitigation activity type as automatically additional. All activities shall undergo a full additionality assessment in accordance with the BioCarbon Additionality Tool, regardless of type or sector. This is confirmed in Section 4 of the BCR Additionality Tool: "The BIOCARBON

STANDARD does not maintain positive lists of eligible project types for the purposes of additionality assessment. All project activities are subject to individualized evaluation under this tool."

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

N/A

BioCarbon does not use a positive list. All mitigation activities are subject to case-specific additionality assessments based on regulatory, financial, market, and barrier analyses.

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

https://biocarbonstandard.com/wp-content/uploads/Baseline_additionalilty_tool.pdf

The BioCarbon Additionality Tool requires project holders to demonstrate that the mitigation activity would not have occurred without carbon credit revenues. This includes evaluation of regulatory status, financial feasibility, and market penetration, validated by accredited third parties and reviewed by BioCarbon. These procedures provide a conservative and evidence-based assurance of additionality.

The BioCarbon Standard ensures reasonable assurance of additionality through a combination of regulatory, financial, and barrier analysis, as operationalized in the Baseline and Additionality Tool, which is mandatory for all mitigation activities.

Project holders shall demonstrate that the activity is not mandated by law, is not financially viable in the absence of carbon revenues, and faces identifiable barriers that carbon finance helps overcome. These conditions are assessed during validation by an independent Conformity Assessment Body (CAB), applying conservative judgment and materiality thresholds in accordance with the *Validation and Verification Manual v3.0* (see Sections 9.7).

9. Permanence – CORSIA

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard supports mitigation activities across four sectors, AFOLU, energy, energy (renewable and efficiency), transport and waste management.

Among these, AFOLU activities, particularly ARR, avoided deforestation, avoided forest degradation, and land-use practices in strategic ecosystems, present risk of reversals of emissions reductions, avoidance, or carbon removals.

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)

Yes

https://biocarbonstandard.com/wp-content/uploads/BCR_risk-and-permanence.pdf

The [BCR Standard](#) (Section 14) defines any verified loss of carbon stocks as a material reversal. There is no minimum threshold for response. All reversals, whether partial or total, shall be reported and compensated through the BioCarbon Reversal Reserve, in accordance with the Permanence and [Risk Management Tool](#) (Section 4.6).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

For sectors and activity types with a risk of reversal, such as AFOLU, [BCR Standard](#) (Section 14) requires project holders to conduct a structured risk assessment in accordance with the [Permanence and Risk Management Tool](#). This assessment shall identify and evaluate the potential causes, relative scale, and likelihood of reversals, including natural, anthropogenic, and governance-related risks. Results are used to classify the project into risk categories and determine appropriate buffer contributions (SOP, Section 18).

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires all activities subject to reversal risk to monitor the risk factors identified in the initial assessment throughout the quantification period ([BCR Standard](#), Section 14).

As established in the [Permanence and Risk Management Tool](#) (Section 4.1), project holders must implement a monitoring plan that tracks exposure to biophysical, anthropogenic, and institutional risks. Monitoring results shall be reported at each verification cycle and are subject to independent validation and review.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The [BCR Standard](#) (Section 14) requires that mitigation activities with reversal risk implement appropriate mitigation measures based on the results of the project-specific risk assessment. As outlined in the [Permanence and Risk Management Tool](#) (Section 3), project holder shall assess the risks related to the implementation of the project

activities in terms of environmental, financial, and social dimensions.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires full compensation for all material reversals of issued mitigation in sectors such as AFOLU.

The [BCR Standard](#) (Section 14) establishes that this liability applies throughout the quantification period, regardless of whether the credits have been used. These measures are operationalized through the [SOP](#) (Section 21), which outlines the compensation and enforcement procedures.

As stated in the [Permanence and Risk Management Tool](#) (Section 4), project holders shall compensate any verified reversals by contributing an equivalent volume of Verified Carbon Credits (VCCs) to the BioCarbon Reserve or by cancelling an equivalent number of valid credits.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_risk-and-permanence.pdf

The BioCarbon Standard includes binding provisions that confer liability on the project holder to monitor, mitigate, and respond to reversals in accordance with program procedures. As outlined in the [Permanence and Risk Management Tool](#) and the [BCR Standard](#), project holders are explicitly responsible for:

- a) Monitoring reversal risks and occurrences throughout the permanence period (Tool, Section 3);
- b) Implement mitigation measures to reduce and/or manage the risk of reversals, in accordance with the provisions of the BioCarbon Standard (Tool, Section 3);
- c) Responding to any verified reversal by compensating the loss through the cancellation of credits or contribution to the BioCarbon Reserve (Tool, Section 4.5);

These responsibilities are also reflected in the [SOP](#) (Section 21), which establishes enforcement mechanisms and the consequences of non-compliance.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard requires project holders to notify BioCarbon within 30 calendar days of becoming aware of any material reversal. As stated in the [BCR Standard](#) (Section 14.1), this notification triggers the verification and compensation process. The obligation to report is a condition for maintaining project registration and credit eligibility.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Upon notification of a material reversal, the program is responsible for ensuring that the reversal is verified and fully compensated in accordance with program procedures ([BCR Standard](#), Section 14.1). As outlined in the [Permanence and Risk Management Tool](#) (Section 4.4) BioCarbon reviews the event, confirms its scope, and oversees the compensation process, either through cancellation of VCCs or deduction from the Reserve. The program may suspend the project if obligations are not met.

12. Sustainable Development Benefits And Safeguards – CORSIA

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

Section 11.7 of the BCR Standard requires GHG project holders to demonstrate compliance with all applicable local, regional and national, and international laws, including those related to human and Indigenous Peoples' rights, such as the UN Declaration on the Rights of Indigenous Peoples and ILO Convention 169.

Project holders shall maintain a *Documentary Management System* to identify, monitor, and periodically review applicable legal requirements.

In addition, in compliance with these documented procedures, project holders shall: (a) identify and have access to legal and other requirements related to its activities; (b) determine how the applicable legal and other requirements relate to the implementation and operation of the GHG Project; and (c) take these legal and other requirements into account when establishing, implementing, maintaining, and continuously improving its document management system.

Conformity Assessment Bodies (CABs) verify legal compliance during both validation (Section 22.4) and verification (Section 25) and shall justify conformity with all applicable laws. Section 25 also requires CABs to ensure that migrated projects comply with relevant regulations.

2) Confirm that your program demonstrates it complies with social and environmental safeguards.

Yes

https://biocarbonstandard.com/wp-content/uploads/BioCarbon_Sustainability_Policy.pdf

BioCarbon's Sustainability Policy affirms its ESG commitments, including human rights, gender equality, climate goals, and governance through oversight and continuous improvement.

BioCarbon upholds corporate social and environmental responsibility through strong governance, ethical business conduct, and sustainability commitments. These are outlined in our [Code of Ethics](#), Sustainability Policy, and *Anti-Corruption Policy*, which guide operations and stakeholder engagement in alignment with international standards.

Since 2021, BioCarbon has been a participant in the United Nations Global Compact, committing to its Ten Principles related to human rights, labor, environment, and anti-corruption. Each year, we submit a *Communication on Progress (CoP)*, detailing how these principles are integrated across our strategies and operations. This communication is publicly available [here](#).

In this framework, the BioCarbon Standard explicitly outlines safeguard requirements in:

- Section 15 (*Sustainable Development Safeguards (SDSs)*): Projects shall identify and mitigate environmental and social risks.
- Section 16 (*Stakeholder engagement and consultation*): Ensures Free, Prior and Informed Consent (FPIC) and inclusive participation.
- Section 11.7 (*Compliance with Laws, Statutes and Other Regulatory Frameworks*): Requires compliance with human rights laws.
- Section 14 — Risk Management: Projects shall assess and manage risks, particularly regarding reversals and permanence, reinforcing safeguard commitments.

The SDSs Tool operationalize safeguards through:

- Section 6: Environmental safeguards (pollution, biodiversity, water, adaptation, among others).
- Section 7: Social safeguards (human rights, labor, gender, land, culture, among others).
- Section 8: Governance and ethics compliance.
- Section 5: Applicability to all BioCarbon GHG projects.

Projects shall complete a safeguard assessment (Annex A), define mitigation measures, monitor risks, and report on implementation. Conformity Assessment Bodies (CABs) validate and verify compliance.

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

https://biocarbonstandard.com/wp-content/uploads/BCR_Standard.pdf

The BioCarbon Standard publicly discloses the institutions, processes, and procedures used to implement, monitor, and enforce environmental and social safeguards, as described in the [BCR Standard](#) and the [Sustainable Development Safeguards](#) (SDSs) tool.

Under the standard, project holders are responsible for implementing and monitoring safeguards, including identifying, assessing, and managing social and environmental risks (BCR Standard, Section 15; SDSs Tool, Section 5). Project holders shall also report on safeguard implementation through periodic Monitoring Reports (Section 21, BCR Standard), which are independently validated and verified by Conformity Assessment Bodies (CABs) (Section 22, BCR Standard). BioCarbon, as the program authority, defines the safeguard requirements, publishes tools (like the SDSs and REDD+ Safeguards), and ensures public access to standards and procedures (Section 28.1, BCR Standard).

According to Section 16 of the BCR Standard, project holders shall conduct stakeholder consultations, including Indigenous Peoples, and provide opportunities for stakeholders to give input during registration and verification stages, and throughout the duration of project implementation. This is further supported by the SDSs Tool, which requires project holders to engage stakeholders in the identification and mitigation of risks and to incorporate diverse perspectives.

In addition, as provided by Section 16 of the BCR Standard, project holders shall establish a grievance mechanism for stakeholders to present any complaints during project planning and implementation, and for the such to be handled and resolved; and BioCarbon has also implemented an [Ethics and Compliance Channel](#) and procedures, available also for external stakeholders such as those associated to projects registered with BioCarbon, to submit complaints (denunciations) and grievances regarding topics such as violations to human rights, labor rights and environmental rights, and other matters. Information about this channel and associated procedures, are provided in the Section Grievance Mechanism and Compliance Channel of the following link: [Transparency and Business Ethics Program](#)

BioCarbon also commits to continuous improvement of its SDS Tool (Section 9, SDS Tool), to ensure its relevance and effectiveness, through periodic reviews and feedback from project holders.

Finally, as provided in Section 11.5.1 of the BCR Standard during the renewal of projects' crediting periods, project holders shall update those sections of the project document relating to the baseline, estimated emission reductions and the monitoring plan, which also includes detailed information necessary for monitoring project activities, assessing mitigation and preventive results and quality control of measurements and quantification related to the SDS tool assessment.

Together, these elements confirm that the BioCarbon Standard not only discloses its safeguard framework but ensures that implementation is transparent, participatory, and independently verified.

End Copy of Application