



PROGRAM NAME: The Open Carbon Protocol

**ORGANIZATION:** oneshot.earth

**ASSESSMENT TYPE:** Non-CORSIA Program Level Assessment

**DATE OF SUBMISSION:** August 05, 2025 **DOWNLOADED ON:** October 24, 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.

None



### 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 Members:** 

- Anna Lerner Nesbit
- Will Coleman
- Jocelyn Musters
- Mark Goldman

Senior Leadership of the Open Carbon Protocol

Thomas Annicg - CEO and Co-Founder

Nazmus Saguib - CTO and Co-Founder

Rio Richardson - Chief Product Officer

Chris Fort - Chief Operating Officer

#### https://oneshot.earth/about/

This can be found at parent company oneshot.earth's website "About Us" -- "Our Team."

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

### https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/ocp-governance-structure

The graphic labeled: Organizational Chart demonstrates the linkage between the oneshot.earth board, leadership, internal functions, and external units (including the OCP Advisory Board and ad-hoc groups to assess grievances and run audits).

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

#### https://www.ocp.earth

The Open Carbon Protocol is a registry platform for new high-quality carbon crediting methodologies and projects with a commitment to transparency, trustworthiness, collaboration and speed.

Our flexible and collaborative registry allows project developers, experts and stakeholders in the voluntary carbon market to create new methodologies and projects that evolve with the science and the market, financing planetary-scale carbon reductions and removals, and providing the right information that buyers need to make informed risk assessments.

We stay independent of the development & approval process - this is driven by our external community of experts, and we have no ability to influence approvals or rejections. This is crucial to ensure our incentives are aligned with the market and the planet.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/ocp-governance-structure#updates-to-the-ocp-handbook-and-decision-making

Our Handbook page "OCP Governance Structure: Updates to the OCP Handbook and Decision Making" explicitly states that Rio Richardson, oneshot's Chief Product Officer, is in charge of the administration of the program. The OCP website also lists all staff and leadership - found here: <a href="https://oneshot.earth">https://oneshot.earth</a>

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



https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/ocp-governance-structure#updates-to-the-ocp-handbook-and-decision-making

Our Handbook page "OCP Governance Structure: Updates to the OCP Handbook and Decision Making" discloses processes for decision making. Rio Richardson, Chief Product Officer, is responsible for the administration and development of the platform. Decisions are made in consultation with the CEO, COO, and other team members. When there's a debate or uncertainty on how to proceed, issues are presented to the Board.

How board appointments are made can also be found in our Handbook page "OCP Board: Advisory Board Appointments" along with how they make decisions. Appointments get decided upon unanimously by oneshot.earth's executive team who select members based on their strategic expertise and alignment with the OCP's mission.

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

N/A

We have been an incorporated business under the state of Delaware since 2022. We will upload proof of registration with the submission of this document.

Jocelyn Musters joined Thomas Annicq on the Advisory Board to the Open Carbon Protocol at incorporation with Will Coleman joining shortly after.

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

N/A

01 2022:

- Company incorporated
- \$5 million pre-seed round fundraise completed
   Launched OCP website
- Engaged engineering team who started working with the CTO on building the prototype of the OCP

### Q2 2022:

- Rio Richardson, CPO Hired
- The first prototype of Open Carbon Protocol developed

### Q1 2023:

Head of Science and Head of Business Development hired

# Q2 2023:

- Team expanded to 15 total
- oneshot.earth carbon credit portfolio established along with methodology for assessing carbon credits published
- Whitepaper for rightsizing carbon credits published

### Q3 2023:

First methodology proposed

#### Q2 2024

First methodology out for public commentary and approved

#### Q3 2024

Milestone of three methodologies in development

### O3 2025

5,877 credits issued by ClimateWells

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/the-ocp-registry-infrastructure

The OCP Infrastructure page explains how we leverage blockchain's immutable ledger, so that data is stored



forever.

The <u>Methodology Development</u> section of our Handbook also explicitly acknowledges that methodologies are constantly evolving with time. We're built to iteratively improve upon developing science so that our program can ensure multi-decadal program element administration. All previous versions of each methodology can be found on the public methodology page.

The maximum crediting period for OCP projects is 10 years, although some methodologies will set shorter crediting periods. Once an initial crediting period is complete, the project developer will have to submit a new project proposal if they wish to 'renew'. Therefore no project will be managed over a 'multi-decadal' timeline and will always be applying recent methodologies and market improvements.

# 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

N/A

We will upload a pdf of our wind down policy with our application.

# 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/conflict-of-interest

Our conflict of interest policy in our Handbook at the link above ensures that our team, partners, leadership, and any user with decision-making authority on our platform adhere to the highest ethical standards. We commit to identifying, disclosing, and managing conflict of interest effectively, safeguarding the trust and integrity upon which the OCP is built.

- 1) We have 2 versions of our COI policy:
  - Our internal team COI policy, covering the OCP management, employees, and board, ensures the OCP operates independently from the methodologies and projects we register.
  - The OCP is designed so that the approval of new carbon crediting methodologies or projects is the responsibility of independent, third-party Experts and Validators; oneshot.earth employees should not have any decision-making authority over these approvals.
  - However, some employees may have more impact on the decision-making process through contact with the decision-making Experts and Validators. These roles will be held to a higher degree of conflict of interest management than other employees.
- 2) Our **expert community policy** covers **voting experts and validators**, who provide external third-party expertise and decision-making on whether new methodologies and projects should be approved. These experts and validators must be independent of the OCP, as well as the methodology curators and project developers using our platform.

Any person or organization acting as a voting expert on a methodology review panel or validating a project must be independent of the project developer involved, ensuring they are impartial and objective; dependency guidelines are listed in the Handbook Page "Conflict of Interest: Dependency Guidelines."

# 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/conflict-of-interest#process

Our COI Procedure for each policy can be found in the Handbook page "Conflict of Interest."

- 1) For our Internal Team: Process:
  - All employees must sign complete a <u>COI Attestation</u> when they join the company. In January, all current employees must update and resubmit a <u>COI Attestation</u>.
  - If a Conflict Of Interest is identified during or between attestations:
  - Communicate the identified COI to your direct OCP manager, who will communicate to OCP Leadership.
  - The identified COI will be added to the OCP Conflict of Interest Register.
  - COI priority, mitigation actions and follow up will be discussed by OCP Leadership and reviewed with the OCP Board.



- Follow Ups will be tracked quarterly in <u>OCP Board meetings</u>.
- 2) External Community Process:
  - All experts and validators, as well as any other user with a potential conflict of interest, must complete and sign our <u>Conflict of Interest Attestation</u> before they start work.
  - In January, all active members of the expert and validator community must update and resubmit the Conflict of Interest Attestation.
  - If a Conflict of Interest is identified during or between attestations:
  - Please contact the OCP team with details.
  - The identified COI will be added to the OCP Conflict of Interest Register.
  - For work not started, the affected person or organization will be removed from the piece of work.
  - For work started or completed, we'll set up a review panel with OCP management and anyone else involved to assess risk and decide on appropriate action. The board will review and approve this decision and action.
- 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/conflict-of-interest

Our Internal COI policy (described above) applies to all oneshot team members, including administrators.

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

 $\underline{https://docs.google.com/spreadsheets/d/1V2Xq4bQe990o2ZQdlIjHt3NcysmWnoWTMz7dlFFKbD4/edit?}\\ \underline{gid=0\#gid=0}$ 

In the event that a COI was identified, it is tracked in our <u>COI registry</u>. The board will review and approve this decision and action. Our process for addressing and isolating the Conflict of Interest is demonstrated above in the previous questions.

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?

**Confidential Information Submitted** 

Information on our insurance is provided at the link above.

#### 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.

#### https://oneshot.earth/about/

Our independent board members are listed under "Our OCP Board Members" at the bottom of the page. Board members function according to the Terms of Reference - which is uploaded along with this application.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook

The OCP 2024 Annual Report is available to download from the OCP Handbook homepage. We will publish future Annual Reports similarly.

October 24, 2025



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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/ocp-sustainability-environmental-and-social-strategy

#### Sustainability / Environmental Impact

We take measures to reduce our own environmental impact, as described in this section. We include a description of how we calculated our own emissions footprint and the credits purchased. We have committed to purchasing twice as many credits as our emissions footprint.

#### Social

This section describes how we are committed to creating a positive and inclusive work environment. Partnering with TriNet for HR needs allows us access to their DEI training to implement equitable hiring practices.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/kyb-and-anti-money-laundering-policy

Our anti-money laundering policy can be found in the Handbook page "KYB & Anti-Money Laundering." It details our approach to safeguarding against money laundering, which includes an understanding of the risks, comprehensive due diligence, KYB checks, and how we report and mitigate instances.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/anti-bribery-and-corruption-policy

Our anti-bribery and anti-corruption policy can be found in the Handbook page<u>"Anti-Bribery and Corruption Policy."</u> The Open Carbon Protocol adheres to the U.S. Foreign Corrupt Practices act (FCPA), as well as has our own robust anti-bribery and corruption policies to mitigate potential issues within our business structure. Our policy outlines the definition of bribery, along with states our commitments and structures in place to prevent cases of bribery and corruption. This includes <u>Mitigation and Training techniques</u>.

### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/stakeholder-engagement-and-complaints

We designed the OCP to clearly display data and information pertaining to methodologies and projects. This happens at each level of activity on the platform.

The Stakeholder Engagement and Complaints articulates our commitment to ensuring all relevant information is displayed to encourage robust stakeholder participation, and willingness to engage if it's not. Under "Reporting Grievances" we specify that if a stakeholder requires information beyond what is currently accessible, they are encouraged to contact the OCP admin team.

The "Methodology Development, Feedback & Approval" page states the information that's made publicly available for methodologies. Specifically, that All methodologies are publicly available. Expert's comments and decisions, as well as public comments and their solutions are publicly available alongside the published version. We maintain a list of published methodologies, along with those currently under review, and upcoming sectors of interest.

On the Project level: "<u>The Project Proposal Flow</u>" page describes the information made available relevant to projects. Specifically: All documents, APIs, and communication history are **publicly and transparently stored on the blockchain** as a single source of truth for future reference. All documentation relating to the project proposal flow is publicly accessible.



On the registry / credit issuance level, we explicitly state all information displayed under "Registry Information". This states all specific documentation displayed on the registry.

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

 $\underline{\text{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#have-a-robust-stakeholder-engagement-processes}$ 

We require project developers to hold stakeholder consultation meeting prior to implementation. This includes establishment of how stakeholders are identified, engaged, and kept informed throughout the project lifecycle. Special attention should be given to groups that may face barriers to participation.

The requirements are specified under "<u>Safeguards, Co-Benefits & SDGs</u>: <u>Have a Robust Stakeholder</u> <u>Engagement Process"</u> which outlines best practices for hosting stakeholder consultation meetings. This includes principles such as:

- Being conducted in the local language(s) and tailored to the cultural context;
- Publicized through both traditional and digital media with ample notice to encourage broad participation;
- Thoroughly documented with transcripts made publicly available to support transparency and accountability, if applicable.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/stakeholder-engagement-and-complaints

The "Stakeholder Engagement & Complaints" page clearly articulates our public commentary provision process. It explains how public commentary periods are conducted for each level of activity: methodology, project, and program.

For methodologies, comments are posted in the "Public Comments" tab under each approved methodology. They are considered first by the methodology curator who reads and responds to all of them. The expert panel then reads the comment response file and flags any issues affecting their vote. If none, the methodology goes through a final vote with all the voting experts, and if an 80% super majority is reached, the methodology gets published.

Public comments during validation are reviewed by the validator and must be addressed before approval. Grievances made on the project after approval will be taken to the Board.

Our process for responding to grievances as a registry can be found under "Reporting Grievances." This document describes the timeline and process on how we decide on resolutions.

Grievances will also be posted on the <u>"Stakeholder Engagement & Complaints"</u> page in our Handbook. Project level comments will be posted with the project description in our registry.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval#mthd-public-commentary

The <u>"Stakeholder Engagement & Complaints"</u> page of our handbook displays a graphic which describes the process of public commentary for methodologies. It's also described in the Methodology, Development and Feedback page under <u>"Public Commentary."</u>

The period occurs after experts conditionally approves (or rejects) the methodology depending on the public comments. The final version of the methodology is publicly available on the OCP website for anyone to submit comments for 30 days. After, the methodology curator / author will read and respond to all comments, taking 14 days to do so. The experts then take 7 days to read the comment and response file, flagging any issues affecting their vote. If none, the methodology is published. Comment files are made available next to the methodology, as described above.



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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow#project-public-commentary

Public commentary related to projects is described both in the <u>"Stakeholder Engagement and Complaints"</u> page along with the <u>"Project Proposal Flow: Public Commentary."</u>

While a proposed project is undergoing third-party validation, the project proposal will be published on the OCP for 15 days of public commentary. The project developer must respond to all public commentary as part of the approval process. All comments will be made publicly available.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/stakeholder-engagement-and-complaints#open-carbon-protocol-public-commentary

The <u>"Stakeholder Engagement and Complaint: Public Commentary"</u> page outlines our process for accepting formal public commentary on our Handbook. We also state that while we have designated public commentary periods for Handbook's versions, we encourage ongoing feedback of our program's activities. Information on this is found under <u>"Stakeholder Engagements & Complaints: Reporting Grievances</u>". More details on versioning and the status of OCP's Public Commentary can be found in the designated "<u>OCP Public Commentary Page.</u>"

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/ocp-public-commentary

Once Handbook versions are finalized, they undergo a formal public commentary period. This is advertised through our communication channels and open for 30 days. Previous versions and updates made are published on the designated "OCP Public Commentary Page," for reference. We provide a response within 14 days. These processes are fully explained in the "Stakeholder Engagement & Complaint: Open Carbon Protocol Public Commentary" page.

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://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow#project-eligibility

As described in <u>"Project Proposal Flow: Project Eligibility,"</u> we focus on project-based activities. We are set up to handle other types of activities like jurisdiction-scale crediting, these will be branded and warehoused separately to avoid creating any confusion.

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://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval

Our platform is open to any offset project type. This is stated under the <u>"Methodology Development Feedback & Approval"</u> page. It states:

**The OCP is sector and geographically agnostic**: anyone with an idea for a methodology yet to see in the market can propose it on the platform. Methodologies can cover any project sector in any geographic region.



### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/stakeholder-engagement-and-complaints#open-carbon-protocol-public-commentary

The <u>"Stakeholder Engagement & Complaints"</u> page of our Handbook details all of our public comment and issue resolution process.

We collect public commentary for Methodologies, Project Proposals, Our OCP Handbook and Process, as well as have a general grievance form available. All commentary is publicly available, with the responses to the comments and our resolution steps as well.

Specifically, <u>How We Engage the Public</u> articulates are processes for collecting comments and ensuring a diverse array of perspectives are collected.

- Public commentary periods are open to anyone, though we understand that certain groups are more
  affected by the policies they represent than others and the importance of having their voices heard
  (such as Indigenous Peoples, and local communities). Public commentary periods are held to hear from
  these perspectives.
- Formal public commentary periods are advertised through our communication channels, as well as through the industry groups we are a part of which have a wide reaching and diverse network. In this way, we are able to gain global perspectives from stakeholders. We are aware that this is a journey and that we will need to actively keep expanding these networks.
- Specific projects are required to conduct local environmental and social risk analysis and gain local feedback through their project 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/stakeholder-engagement-and-complaints#open-carbon-protocol-public-commentary

In our Stakeholder Engagement & Complaints page we detail the process for Grievances under <u>Reporting</u> <u>Grievances</u> which states our process for ongoing grievances (which is free of charge).

- Outside of formal public comment periods, we encourage anyone to contact us to give thoughts or feedback on the OCP platform - especially if they have a question or complaint about the platform or with any of our partners.
- Grievances are taken seriously and we refer to our independent board to decide on the best course of action. We are open to having dialogues with those who have raised issues and will work to the best of our ability and within reason to come to a resolution.
- If a stakeholder requires additional information beyond what is currently accessible, they should contact the OCP admin team. The admin team will then coordinate with the appropriate user to fulfill the information request.

### Email: admin@ocp.earth

Previous complaints, public commentaries, and solutions will be published in the Handbook and on the OCP website unless the one reporting the grievance wishes for it to be kept confidential.

# 2.1 <u>Effective Registries (Retirement and Addressing Erroneous Issuance) - CORSIA</u> 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval/underlying-credit-value-and-uncertainty

Confirmed. We define the underlying credit value of credits in our Handbook page "Underlying Credit



Value" which defines a credit as being equal to one tonne of CO2e removed or avoided in the atmosphere.

This is ensured through the <u>methodology approval process</u>, where experts must positively attest to: "If a project developer complied with this methodology, would each carbon credit produced by the project represent one tonne of CO2e avoided or removed?"

Projects must be validated against methodologies in order to ensure claims of underlying attributes are true. Per the "Credit Issuance Flow" page in our Handbook, credits only get issued after they are validated to ensure verified data accurately reflects the underlying attributes.

# 2) Confirm that your programme defines and ensures the underlying property aspects of a unit https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/credit-issuance-flow

The "Credit Issuance Flow" page describes all property aspects related to credits that are tracked and traced on the registry. These properties are made publicly available. This includes the credit status (active, retired, cancelled, or on-hold if during transfer). These aspects are traceable throughout the credit lifecycle and includes ownership details, whether it has been validated, and the date of retirement, transfer or cancellation.

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

https://pilot.ocp.earth/registry

Confirmed. Our registry can be found here.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval

In our registry interface, we have the capability to add in extra clarifying criteria and quality signals, such as CCP approval or other special tags. These will be contingent on which categories are deemed CCP eligible. We confirm that we have a system that can easily implement and adapt to changes in CCP labels, as well. As described in the "Methodology Development, Feedback & Approval" page, the OCP registry tracks and publicly displays which certifications the methodology is eligible under.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/credit-issuance-flow

We confirm that we have procedures in place to ensure that we facilitate the tracking of credit. We provide details on what this entails on the "Credit Issuance Flow" page of our Handbook.

We have established our credit issuance flow such that anyone will be able to trace a particular credit through its lifecycle and access details such as ownership, retirement, cancellation, and issuance, and when the events took place.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/registry-information

We confirm that our registry allows us to identify and display credit status. In our Handbook on the Registry Information page, credit statuses are described in the "Credit Issuance Flow":

- Active (after a credit has been issued and is available for transfer)
- Retired (after a credit has been retired; no further action can be taken)
- Cancelled (if a project has been removed or stopped on the OCP registry; no further action can be taken and it cannot be claimed as part of an offset or BVCM claim)



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

#### https://pilot.ocp.earth/registry

Confirmed. Each credit has a unique 'token' ID and is stored on-chain as separate tokens.

This can be found on our registry and with details in our Handbook under "Registry Information."

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

## https://pilot.ocp.earth/registry

We confirm that each unique credit unit is publicly visible and can be tracked back to the project-level, including project country, sector, issuance date (vintage) and original project registration date. All of this information is gathered either during the project proposal flow or during issuance and then displayed publicly on the registry. See registry <u>here</u>.

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)

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/the-ocp-registry-infrastructure#registry-security

Confirmed. The <u>"Registry Infrastructure"</u> page describes how we leverage blockchain's immutable ledger to ensure secure credit tracking measures. Every transaction is cryptographically signed, permanently recorded and verified by a distributed network of nodes, making unauthorized alternations impossible.

10) Confirm that your programme's registry(ies) conform to international data exchange standards <a href="https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/the-ocp-registry-infrastructure">https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/the-ocp-registry-infrastructure</a>

Confirmed. We are integrated with Climate Action Data Trust which acts as a third-party source to track and store all associated carbon credit data to ensure universal tracking across platforms.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/the-ocp-registry-infrastructure/opening-and-closing-an-account

All registry users (i.e. can hold, transfer or retire carbon credits) go through Know-Your-Business (KYB). For KYB we use Middesk, a leading B2B Business Identity Partner. [See " KYB & Anti-Money Laundering" for more details]. We also have non-registry accounts (e.g. methodology expert community) that do not require KYB upon sign up, but they are required to go through KYB if they wish to convert their account to a registry account that can own credits.

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

https://pilot.ocp.earth/terms-and-conditions

In the <u>OCP Terms of Service</u>, which are agreed upon account sign up, item 2.2.2 reads "User Account represents a business, corporation or organization, not an individual (natural person)." We perform KYB checks on all registry accounts to confirm these details.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/annual-audit-process#ocp-audit



The Handbook outlines the <u>Annual Audit Process</u> which includes audit on user accounts and that security provisions are adhered to and robust. This is described in the platform under requirements for audits pertaining to the <u>OCP Audit</u>, and is conducted by an independent auditor.

# 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/credit-issuance-flow/retirement-information

The Handbook page <u>"Retirement Information"</u> describes our credit retirement policies, including identification of ownership.

The beneficiary and retirement purpose must be recorded and displayed in the OCP registry in order for credit to be retired. Beneficiaries undergo KYB, as well.

All associated retirement information (i.e., beneficiary, credit quantity, and any additional ownership transfers) are made publicly available in the <u>registry</u>.

### 2) requires the identification of the purpose of retirement

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/credit-issuance-flow/retirement-information

The Handbook page <u>"Retirement Information"</u> describes our credit retirement policies, including identification of purpose of retirement. The beneficiary and retirement purpose must be recorded and displayed in the OCP registry in order for credit to be retired.

All associated retirement information (i.e., beneficiary, credit quantity, and any additional ownership transfers) are made publicly available in the registry.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/credit-issuance-flow/retirement-information

The Handbook page "Retirement Information" describes what happens in the event of erroneous issuance.

In the event that credits are found to be erroneous, either by grievance submission or during an annual audit, retired credits will be canceled and cannot be used anymore.

Compensation of cancelled credits is currently achieved through our buffer pool (See "Mitigating Project Risk: Insurance and Buffer Pool") but we are partnering with Kita.Earth to supplement this with a project insurance approach and looking forward to working with the ICVCM Continuous Improvement Work Plans to integrate project insurance as an alternative to buffer pools.

# 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#platform-use

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

The Handbook page "Third-Party Validation and Verification: Platform use" states that: All discussions, including the sharing of documents and data, happen on the platform, streamlining & speeding up the



validation process and allowing better version-tracking, communication, and data security than sending via email or other services. The results of the third-party validation and verifications, including the Validation Statement and Report, will be made publicly available on the OCP Registry.

#### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/registry-information

All documentation is made publicly available, as described in the page <u>"Registry Information."</u> Instead of a PDF, we request the 'PDD' (mitigation activity design document) information directly via our platform, allowing for better readability and transparency.

- 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/registry-information

All documentation is made publicly available, as described in the page "Registry Information."

However, we are aiming to get away from long project design documents that do not display useful information. We have opted towards highlighting each of these aspects in a clear manor on our <u>Registry</u> under each activities' description.

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

### https://pilot.ocp.earth/registry/2

All information on monitoring and compensation periods is listed on the public project page of the <u>Registry</u> under "Monitoring Plan". Each credit is linked to a specific issuance event via the token ID.

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.

 $\underline{\text{https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/stakeholder-engagement-and-complaints}$ 

Our Handbook policies include information requests under "Stakeholder Engagement & Complaints." If a stakeholder requires additional information beyond what is currently accessible, they should contact the OCP admin team. The admin team will then coordinate with the appropriate user to fulfill the information request. Information made available is articulated on the "Registry Information" page of the Handbook.



Additionally, all relevant program level documents can be navigated through our website. This will lead to:

- Methodologies, (with past iterations and public comments are viewable)
- The registry where projects are listed along with all relevant documentation associated with them.
- The Handbook which articulates our processes and policies.
- Our board
- Contact information

### 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification

Our policies for validation are described in our Handbook under "Third-Party Validation". This page describes how projects can either undergo validation or assurance, and the process for each of these. Credits can only get issued after projects have been reviewed by a third party and approved according to the validation requirements.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#data-verification

All project data must be verified by a third-party before the OCP issues credits. Data can be verified in two ways:

- **Per Issuance:** manually verified by a VVB / auditor every time data is submitted to the OCP, which is requested on each 'monitoring date' either by csv file or API connection. This will be in tandem with validation if projects only have one issuance. The same VVB / auditor can perform subsequent data verification.
- Pre-Verified dMRV Process: the process & <u>dMRV</u> partner is pre-verified during project approval by the Project Validator. Future data is then received directly from the dMRV partner and after an additional check by the OCP, credits get issued immediately.

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

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification\#accreditation}$ 

In the OCP Handbook, the "Third-Party Validation and Verification" page details requirements for how we select VVBs and Auditors. They must be accredited by an international standard such as ISO 14065 or UN DOE for VVBs, or under IAF or SAE for accredited auditors. The accreditation status is checked during registration of the VVB by OCP admin and <u>audited yearly</u>.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#vvb-and-auditor-selection-requirements

The OCP requires both Validators and Verifications to have the same level of accreditation. "Third-Party Validation and Verification: VVB Auditor Selection Requirements" details requirements for how we select VVBs and Auditors. They must be accredited and aligned to an international standard such as ISO 14065, UN DOE, under IAF or SAE for accredited auditors. The accreditation status is checked during registration by the VVB and audited yearly.



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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#data-verification

Our two pathways of data verification ensure that validation happens prior to or in tandem with verification. As described in the Third-Party Validation and Verification page under " <u>Data Verification</u>" we describe the two methods for data to be verified on our platform.

- **Per Issuance:** manually verified by a VVB / auditor every time data is submitted. This will be in tandem with validation if projects only have one issuance. The same VVB / auditor can perform subsequent data verification.
- **Pre-Verified dMRV Process:** the process & dMRV partner is pre-verified during project approval by the Project Validator. Future data is then received directly from the dMRV partner and after an additional check by the OCP, credits get issued immediately.

# 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#data-verification

In order for credits to be issued on the OCP, all project data must first be verified by an independent third-party entity. We outline these policies in our Handbook under Third-Party Validation and Verification page under "Data Verification" as well as in the "Credit Issuance Flow" page.

# 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/credit-issuance-flow

Credits only get issued ex-post after monitoring events take place, which has resulted in verified data on emissions avoided or removed.

Once data has been confirmed by the OCP or relevant third parties, carbon credits equal to the calculated emission reduction or removal will be issued into the Developer's inventory of carbon credits.

# 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#conflict-of-interest-policy

We require VVB and Auditors to comply with several processes in order to be approved on our platform. This includes our <u>Conflict of Interest policy</u> which covers both internal and external relationships.

Our Conflict of Interest Policy requires contractors to declare any project developers they have a pre-existing relationship with that would constitute a conflict of interest. The OCP asks for all potential COIs upon initial onboarding, and every year as part of the third-party partner audit process.

VVBs with a conflict of interest with the OCP programme or team will not be allowed to validate or verify OCP projects.

If the VVB & Auditors have their own internal COI policy, they can upload their procedural documents in our form.

# 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification

All validators must follow our <u>conflict of interest policy</u>, ensuring independence (financial or otherwise) from any project developer they work with, and comply with our annual audit process to assess protocol compliance and validation performance.



• VVBs with a conflict of interest with the project proponent will not be selected to validate their project. • VVBs & Auditors must disclose familial relationships with the project developer methodology curator, or OCP leadership in their conflict of interest attestation.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#performance-oversight

Per our requirements for VVBs stated in our <u>"Third-Party Validation and Verification: Conflict of Interest Policy"</u>, all validators must follow our conflict of interest policy, ensuring independence (financial or otherwise) from any project developer they work with, and comply with our annual audit process to assess protocol compliance and validation performance.

As per our <u>conflict of interest policy</u>, the affected person or organization will not be allowed to start the relevant validation or verification process.

In any case where work has already been started or is fully completed and a COI arises, the OCP team will set up a COI review panel with OCP management and board and anyone else involved to assess risk and decide on appropriate action. The board will review and approve this decision and action.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow#renewal-of-crediting-period

The "Project Proposal Flow" Handbook page describes our policies for project renewal. The maximum crediting period allowed on the OCP is 10 years, although some methodologies will set shorter crediting periods. Once an initial crediting period is complete, the project developer will have to submit a new project proposal if they wish to 'renew'. This project proposal will need re-Validation by a different third-party Validator than any previous projects using the same methodology.

This process greatly reduces the chance for low-integrity projects or project fraud to operate on the OCP. In today's frequently changing carbon markets, we ask project developers to consider all projects as 'new', even if some of the underlying documents and information will be the same.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#timing

Under "Timing" on the Third-Party Validation and Verification page, we explain that validation must happen within a year of project registration unless an extension was pre-discussed with the OCP Admin (Rio Richardson). Verification (and therefore issuance events) must happen at minimum once a year, although they can be more frequent.

In the case of a gap over one year between project registration and the beginning of validation, or from one verification event to the next, then the project will need to redo the project proposal process with current information to make sure all updated regulations and public consultations are accounted for.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/credit-issuance-flow

The OCP only allows ex-post credit issuance. In the "Credit Issuance Flow" Handbook page, we state that credits only get issued **ex-post**, after monitoring events take place, and only issued based on verified

historical data on emissions avoided or removed.

### 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).

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#vvb-and-auditor-selection-requirements

In order for VVBs to be approved, they must be accredited. We state in the Handbook page <u>"Third-Party Validation and Verification: VVB/Auditor Selection Requirements:"</u>

All validators are required to be recognized under an international standard such as:

- according to ISO 14065
   under UN DOE
- approved by a member of IAF or ISAE for accredited auditors.
- 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification#performance-oversight

We have provisions for performance oversight of VVBs in the Handbook page <u>"Third-Party Validation and Verification: Performance Oversight."</u>

During our annual audit process, we run two processes:

- 1. We confirm **accreditation**, **expertise** and reassess potential **Conflict of Interest** by requesting an information update from each VVB, and then running internal due diligence with the relevant accreditors.
- 2. We work with independent third party assessors to **review a random selection of validation reports and processes** to assess performance, accuracy and completeness.

Instances of non-compliance or misconduct are reported to the accreditation body, and the OCP reserves the right to restrict partnerships and suspend VVB accounts in the event of poor performance or behavior.



## **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.

https://pilot.ocp.earth/all-methodologies

All methodologies along with public commentary are published on the OCP's website at <a href="https://pilot.ocp.earth/all-methodologies">https://pilot.ocp.earth/all-methodologies</a>. All expert comments can be seen for each round, adding transparency to the methodology development and allowing stakeholders to see how and why decisions were made.

We have one existing protocol and list the others that are currently under review at <a href="https://pilot.ocp.earth/upcoming-methodologies">https://pilot.ocp.earth/upcoming-methodologies</a>. Methodologies that have been rejected by expert panels will also be made publicly available for reference, but will not be available to be used to propose projects or issue credits.

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

 $\underline{\text{https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval}}$ 

The process for proposing new methodologies is laid out in the OCP Handbook page "Methodology Development Feedback and Approval." This section describes our open process for methodology development, in which methodologies are proposed by external stakeholders and iterated on by a panel of experts, working together to craft and approve (or reject) high-quality methodologies.

This panel includes academic and industry experts, potential project partners, rating agencies and buyers. The duration of the process will vary, but we estimate it will take 10-12 weeks for the panel to reach the 80% super-majority required to conditionally approve the methodology. If the super-majority is not reached, the methodology is rejected. If conditionally approved, the methodology then undergoes a 1-month public commentary period before going for a final vote. If the final vote maintains the 80% supermajority, the methodology is published and ready to be used for carbon crediting projects.

While the OCP encourages flexibility for teams to work on what they deem most important, methodologies must meet key criteria in our requirements on how to write methodologies for the VCM which aligns with ICVCM standards on protocol requirements.

Methodology revisions can be prompted by one of two events. Firstly, the OCP runs an annual audit of all methodologies to assess which need to be updated. Secondly, the OCP accepts grievances, complaints and comments on all approved methodologies at any time. This will kick off a revision process if the comment is upheld.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval

The process for developing new methodologies is always publicly available in the OCP Handbook page "Methodology Development, Feedback and Approval."

All <u>current</u> and <u>future</u> methodologies are publicly available on the OCP website, with their current status (approved/rejected, public commentary, in review, in pipeline, or future areas of interest). Experts can apply to join the panel of any upcoming methodology.

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

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval\#the-expert-panel}$ 

In order for a project to be approved, expert panelists must approve the methodology. To do so, they have to positively attest to the statement:



• "Does this methodology set conservative and accurate calculations, grounded in the latest scientific data, to ensure that the mitigation activity is not overestimated?"

<u>Annual audits</u> are done on the entire platform per our audit strategy to ensure that our experts are doing their best work and accounting measures are conservative, accurate, and use up-to-date science.

# 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification/dmrv-digital-monitoring-reporting-and-verification

Monitoring, measuring and reporting processes are laid out in both <u>Methodology Requirements</u> and the <u>Project Proposal Flow.</u>

During the Project Proposal, the Project Developer schedules 'monitoring/issuance dates' throughout the project time frame (can be annual, or more frequent) and specifies who is collecting monitored data: internal procedures or a third-party dMRV partner(s).

On the 'monitoring/issuance date', data is requested from dMRV providers (usually via API, but also be provided via a csv file) and inputted into the credit calculation algorithm. [See the "dMRV: Digital Monitoring Reporting and Verification" page].

If the dMRV process and partner has been pre-validated, data is internally verified and credits automatically issued. If the data comes from the PD, a third party VVB verifies the data before credits are issued.

Additionally, the <u>OCP methodology development requirements</u> include practices for monitoring, reporting and verification.

As part of the GHG Impact / carbon credit calculation described above, project developers must specify how they plan to measure and report the monitored variables in the carbon equation. The monitoring process should also include evaluation of any local activity that may undermine efforts of the project. Methodologies provide guidance on units used, frequency of reporting, and criteria for an effective monitoring process, as well as opportunities for dMRV. Data from monitoring will be stored on the OCP registry blockchain, and also backed up on our AWS server.

## 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/annual-audit-process

Updates to methodologies can either happen internally through annual audit assessments of methodologies or initiated by another stakeholder via the <u>grievance</u>, <u>complaints and comments process</u>. If an external stakeholder wishes to revise an existing methodology or add a new module (e.g. increasing eligibility for a new geography), the expert panel will reassemble to look at and approve the proposed revisions.

Per the <u>Methodology Review and Audit Process</u>, every year, a panel of experts (both internal and external) will be assembled and work with an OCP employee to assess all published methodologies on a three part scale: all good / check up-to-date / critical flag (looking especially at risk of over-crediting or changes in additionality).

If a methodology requires an update, an expert panel is assembled to review the updates + vote on reapproval. The voting expert panel will also vote on whether existing projects will need to be cancelled and re-submitted, including undergoing a new validation process, and whether existing credits will need to be cancelled. In the event of credit cancellation, buyers are refunded via the buffer pool or via project insurance from a third-party (e.g. kita.earth insurance).

The OCP does not delete cancelled or revised methodologies, as we believe there is enormous value in



documenting issues with the VCM and learning from mistakes.

- 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.

# https://docsend.com/view/ecb77yuysd87dhui

All methodologies are required to complete 17 sections during the development process:

- 1. Introduction
- 2. Conservativeness
- 3. Eligibility
- 4. Additionality
- 5. Project Boundary
- 6. Start Date, Reporting Period, and Crediting Term
- 7. Quantification of GHG Emissions (Baseline Emissions, Project Emissions, Leakage, and Uncertainty)
- 8. Permanence
- 9. Monitoring Plan
- 10. Data Management
- 11. Buffer Pool
- 12. Regulatory Compliance
- 13. Third Party Project Validation
- 14. Third Party Data Verification
- 15. Periodic Reviews
- 16. Credit Ownership
- 17. UN Sustainable Development Goals (SDG) Contribution

The data for each section is available on the public methodology page, available at:

https://pilot.ocp.earth/all- methodologies

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.

### https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/the-expert-community

The entire OCP methodology development process is designed around groups of independent experts reviewing, providing feedback and finally voting whether to approve or reject the methodology. The voting experts provide feedback in iterative cycles. At the end of the cycles they vote whether or not the methodology should pass according to the following criteria:

- "Does this methodology employ conservative and accurate calculations, grounded in the latest scientific data, to ensure that the mitigation activity is not overestimated?
- If a project developer complied with this methodology, would each carbon credit produced by the project represent one tonne of C02e avoided or removed?
- If the answer is no, then what prevents this?"

Each methodology undergoes 30 days of public consultation after the experts reach a 80% supermajority decision on conditional approval. After public commentary has been concluded, the experts reassemble for a final vote based on the outcome of the public consultation. Methodologies currently in public commentary can be accessed here: <a href="https://pilot.ocp.earth/public-commentary">https://pilot.ocp.earth/public-commentary</a>

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/annual-audit-process#methodology-review--audit

Our Methodology Audit process describes our systematic approach to ensuring that GHG emission reduction



and removal estimations are accurate, and additionality principles met. Audits on methodologies happen annually, or ad-hoc if needed. A team composed of an OCP staff member, scientific advisor, VCM validation and compliance expert, and sector experts (as required) conduct the audit process and flag any methodologies that need updating.

Additionally, anyone can submit an anonymous or non-anonymous complaint or flag for updates via our <u>Independent Grievance/Complaint process</u>, which is open at all times. This will kick-off the immediate review of the relevant methodology and/or projects.

#### 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.

#### https://docsend.com/view/ecb77yuysd87dhui

The OCP's Process is set up to ensure that at each stage of project implementation, project developers are using realistic, defensible and conservative baseline estimations.

Methodologies are developed according to the <u>OCP's Methodology Requirements</u>. Section 7 "Quantification of Greenhouse Gas Emissions" describes baseline scenario setting, which requires basing calculations off of conservative and scientifically defensible baseline estimations.

Expert panels only approve methodologies (see "Methodology Development & Approval: Expert Panel") if they believe that the methodology ensures that each carbon credit issued would conservatively represent one tonne of CO<sub>2</sub>e avoided or removed. (Experts must positively attest to the question "Does this methodology employ conservative and accurate calculations, grounded in the latest scientific data, to ensure that the mitigation activity is not overestimated?")

Project developers must submit detailed baseline scenarios, and validators confirm that these scenarios align with the methodology and apply conservative assumptions. See the Validator template report <u>here</u>.

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

### https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow

The project proposal flow (see <u>"Project Proposal Flow"</u>) demonstrates our procedures to publicly disclose baseline and underlying assumptions. The PD must provide evidence of validity including the baseline scenario and any deviations from the methodology.

All documents, APIs, and communication history are **publicly and transparently stored on the blockchain** as a single source of truth for future reference.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval#the-expert-panel

Methodologies proposed on the OCP have to follow the structure laid out in the <u>OCP Methodology</u> <u>Requirements</u>, which includes Section 2 on "Conservativeness and Uncertainty" overall, and 'quantification' which centers on having conservative estimations of emissions.

The method of calculating 'Baseline Emission' will be specified in the methodology, but all require good documentation of the variables and sources of data.

The expert panelists vote to approve these sections of methodologies based on the following criteria:

- "Does this methodology employ conservative and accurate calculations, grounded in the latest scientific data, to ensure that the mitigation activity is not overestimated?
- If a project developer complied with this methodology, would each carbon credit produced by the project represent one tonne of CO2e avoided or removed?
- If the answer is no, then what prevents this?"



At a project level, the Validator assesses the project documentation against the methodology. See the Validator template report here.

# 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow

Our project proposal flow includes space for project developers to include deviations from the methodology, which includes deviations from baseline conditions.

For projects with continuous issuances, we highly encourage dynamic baselines (i.e. include monitored variables in the baseline quantification equation) to reduce uncertainty. This is described in the Handbook page "Underlying Credit Value & Uncertainty."

For projects that only issue once, baseline changes will be captured by the yearly review.

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

### https://pilot.ocp.earth/all-methodologies

The OCP is designed to be sector agnostic, and we plan to cover a range of sectors which have varying degrees of leakage risk. We list all sectors currently covered by the OCP on the <u>Approved Methodology page</u>. Each activity type has to report leakage risks in both methodology and project level documentation, which is outlined in the individual page and on the sub-sector pages.

# 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.

https://pilot.ocp.earth/sectors/industrial/oil-or-gas-well-management

For relevant activity types, our program requires methodology developers to incorporate **quantitative assessments of leakage risk**, using peer-reviewed literature and established modeling tools (e.g., Oil Climate Index, market elasticity studies). This is established in our <u>Methodology Requirements and</u> included as a section in the project proposal flow, as described in the Handbook page <u>"Project Proposal Flow."</u>

For example, in our marginal oil and gas decommissioning methodology, leakage is assessed based on the **market average carbon intensity** and the **relative permanence of sequestered reserves**, applying a **57% leakage deduction** as a conservative default, following guidance from Resources for the Future and Rocky Mountain Institute.

In addition, leakage is also addressed by Kita.Earth when they do buffer pool analysis, and rating agencies when they review methodologies and projects. This is described in the Handbook page "Mitigating Project Risk: Insurance and Buffer Pool."

We provide a breakdown of how each sub-sector approaches leakage risk on each individual sub-sector overview pages (e.g. 'Oil and Gas Well Management': <a href="https://example.com/here">here</a>)

# 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.

#### https://docsend.com/view/ecb77yuysd87dhui

The OCP is focused on project-based activities, therefore we have provisions in place to mitigate leakage risk at the project level. This is covered through requiring leakage assessment and quantification in methodologies to mitigate their own unique leakage risks.

As a guiding rule, in the <u>Methodology Requirements</u>, we require methodologies and activity types that pose a risk of **market-based or physical emissions leakage** to include:

- Quantified leakage deductions Conservative baseline setting,
- **Eligibility criteria that** helps to ensure that only the most impactful and least easily substituted emissions sources are targeted.
- Mandatory buffer pool contributions (minimum 5% of credits), which provide a safeguard



against any residual, unforeseen leakage or reversal at all scales.

Ongoing monitoring procedures.

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

https://docsend.com/view/ecb77yuysd87dhui

<u>Section 9 of the methodology requirements</u> require a monitoring description of how variables in the quantification equation are monitored. This includes leakage.

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

https://docsend.com/view/ecb77yuysd87dhui

We require all methodologies to complete the full 'GHG Quantification Calculation': Baseline Emissions - Project Emissions - Leakage \* % Uncertainty Discount. So therefore all projects and methodologies deduct leakage emissions from the overall quantification calculation of 'mitigation benefits' (i.e. credits). See Section 7 of the Methodology Requirements document for more details.

- 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval/underlying-credit-value-and-uncertainty

We define credit value under the Handbook page "Underlying Credit Value & Uncertainty." We state that the underlying credit value must equal one tonne of CO2e removed or avoided in the atmosphere. This is ensured through our methodology process, given that methodology approval is based on the expert's positive attestations to the question:

- 'If a project developer complied with this methodology, would each carbon credit produced by the project represent one tonne of C02e avoided or removed?'
- 2) disclose the global warming potential (GWP) values used to calculate the CO2 equivalence.

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval/underlying-credit-value-and-uncertainty

As described under the Handbook page "Underlying Credit Value & Uncertainty," calculations for CO2e must use the most current 100-year GWP value, which is provided by the most up to date IPCC assessment report. Currently it is the 6th report, published in August 2024, found here.

3) define the length of crediting periods, including the total length of combined crediting periods. https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow#renewal-of-crediting-period

Information on the lengths of crediting periods can be found under <u>"Project Proposal Flow: Renewal of Crediting Period."</u> It states that a maximum crediting period allowed on the OCP is 10 years, although some methodologies will set shorter crediting periods. Once an initial crediting period is complete, the project developer will have to submit a new project proposal if they wish to 'renew'.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow#renewal-of-crediting-period-requires-either

Information on the lengths of crediting periods can be found under <u>"Project Proposal Flow: Renewal of Crediting Period."</u> The maximum crediting period allowed on the OCP is 10 years, although some methodologies will set shorter crediting periods. Once an initial crediting period is complete, the project developer will have to submit a new project proposal if they wish to 'renew'. This project proposal will include reassessment of baseline scenarios and need revalidation by a different third-party Validator than any previous projects using the same methodology.

This process greatly reduces the chance for low-integrity projects or project fraud to operate on the OCP. In today's frequently changing carbon markets, we ask project developers to consider all projects as 'new', even if some of the underlying documents and information will be the same.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval/underlying-credit-value-and-uncertainty#uncertainty

Section 2 and Section 7 of the <u>Methodology Requirements</u> ensures uncertainties are addressed throughout and are included in the quantification equation. All methodologies (and sectors) have areas of uncertainty and areas that need further research, such as uncertainty in direct measurement of emission parameters, assumptions and default values used in models, or unproven areas of new scientific research. Areas of uncertainty should be flagged early for readers and potential users of the methodology to understand upfront.

We require the methodology curator to describe how they will ensure appropriate conservative quantification techniques throughout to address uncertainties. Uncertainty is a mandatory variable in the emission reduction/removal equation. As a registry, we have a wider thesis on uncertainty and how to address it in carbon markets which can be found in the Handbook page "Underlying Credit Value & Uncertainty."

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval/underlying-credit-value-and-uncertainty#uncertainty

Section 2 of the <u>Methodology Requirements</u> ensures uncertainties are addressed throughout and that conservative default values are chosen. Expert panelists must positively attest to the statement: *Does this methodology employ conservative and accurate calculations, grounded in the latest scientific data, to ensure that the mitigation activity is not overestimated?* All methodologies and project types are audited to ensure they are still up-to-date (i.e. using the most conservative methods). This is described in the Handbook page <u>"Annual Audit Process: Methodology Review + Audit."</u> If methodologies are found to not be using the most conservative estimates, an expert panel is assembled to discuss and update any relevant parts of the methodologies using industry or sector- level standards.

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.

#### https://docsend.com/view/ecb77yuysd87dhui

In Section 7 of the <u>Methodology Requirements</u>, we include a definition and description of how to calculate the baseline scenario. We reference ICVCM's directionality on this stating that: "Baselines should also take



into account existing government policies and legal requirements that might lower GHG emissions. As described in ICVCM's assessment framework, this might include feed-in tariffs for renewable energy, minimum product efficiency standards, air quality requirements or carbon taxes."

#### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/credit-issuance-flow

The Handbook page "Credit Issuance Flow" describes how credits on the OCP only get issued ex-post after monitoring events take place, which has resulted in verified data on emissions avoided or removed.

Once data has been confirmed by the OCP or relevant third parties, carbon credits equal to the calculated emission reduction or removal will be issued into the Developer's inventory of carbon credits.

### 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/no-double-counting

The Handbook page "No Double Counting" explains our approach to ensure no double registration. Project developers must sign a declarance of exclusion in the project proposal flow stating that they have not registered their project on any other registry in order to prevent double issuance. We currently do not allow projects overlapping with mandatory domestic mitigation schemes to be registered on the OCP, due to the potential for benefit duplication.

Any PD willingly in breach of this rule will have their account banned for 1 year and the credits cancelled. Two breaches = permanent ban.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/no-double-counting

The Handbook page "No Double Counting" explains our approach to ensure no double issuance occurs. Credits are issued with a unique serial number with data stored on blockchain to ensure traceability and that each credit only corresponds to the specific emissions within the project boundary. Third-party verification and annual audits are conducted to ensure double issuances have not occurred. We are also part of the Climate Action Data Trust meta-registry to ensure credits are not being double issued or counted across different registries.

#### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/registry/no-double-counting

The Handbook page "No Double Counting" explains our approach to ensure no double use occurs. Credit ownership is traced and stored on blockchain to ensure that the credit is not traded again after it has been



retired (which would lead to double use). Once a credit is retired, the underlying token is moved into an OCP 'dead' wallet where it cannot be interacted with by any other user.



# **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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow

As shown in the pdf of our project proposal flow found on the <u>"Project Proposal Flow"</u> page of our Handbook, we require project developers to demonstrate they've conducted environmental and social risk assessments and describe measures they've taken to safeguard against the risks. We are working with partners to develop our safeguard and co-benefit monitoring and certification process.

We describe principles project developers should abide by when conducting these risk assessments in the Handbook page <u>"Safequards, Co-Benefits & SDGs: Conduct Environmental and Social Assessments."</u>

### 2) Confirm that your program uses sustainable development criteria

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#alignment-to-sustainable-development-goals}$ 

The Handbook page <u>"Safeguards, Co-Benefits & SDGs: Alignment to Sustainable Development Goals"</u> explains how projects can measure their use of sustainable development criteria, and set up best practices that align with these principles. Designing solutions that address these issues requires careful attention to avoid creating new problems while solving existing ones. This principle is embodied in the phrase: **"Do no harm."** 

At its core, this principle ensures that projects are developed in a way that minimizes harm to both the environment and society - as a program it's our responsibility to ensure we're supporting projects that are aligned with this as well.

As well as the details outlined below, we use the UN's SDG framework to provide space for project developers to explain how their project contributes to any of the 17 Sustainable Development Goals.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#monitoring-and-validation

"Safeguards, Co-benefits & SDG: Monitoring and Validation" explains our approach for MRV for these criteria. For each SDG and co-benefit / safeguard, we ask project developers to outline what they are doing and how they are going to monitor it. This gets assessed by the VVB during project validation. We are looking for specific safeguard and co-benefit validators and are following market trends on the best approach to monitor these fields.

### 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/wpcontent/uploads/sites/19/2018/11/UNDRIP E web.pdf
  - https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#mitigate-risks-with-safeguards

We describe how to abide by national and local laws in the Handbook page <u>"Safeguards, Co-Benefits & SDGs: Mitigating Risks with Safeguards."</u> Project developers should implement safeguards to protect against



identified risks, and as best practice should review and align to the UN Declaration on Rights of Indigenous Peoples and the International Bill of Human Rights.

As shown in the pdf of our project proposal flow found on the <u>"Project Proposal Flow"</u> page of our Handbook, we require project developers to list all applicable host country laws they must abide by.

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.

 $\frac{\text{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs?}{g=international\#mitigate-risks-with-safeguards}$ 

As displayed in the pdf of the project proposal listed on the <u>"Project Proposal Flow"</u> page of the Handbook, we require project developers to provide an assessment of each of the criteria contained in 7.2 to 7.8.

These are detailed in the Handbook page "Safeguards, Co-benefits & SDGs: Mitigate Risks with Safeguards."

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.

 $\underline{\text{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#have-a-robust-stakeholder-engagement-processes}$ 

Project developers are required to provide evidence of their prior public engagements / public consultations in the project proposal flow (see questions under "Stakeholder Engagement and Human Rights" in the pdf on the "Project Proposal Flow" page of the Handbook).

They must demonstrate FPIC engagement by answering:

 Describe the procedures in place to prevent negative impacts on land or territorial rights of Indigenous Peoples and local communities, including physical and economic displacement. If applicable, explain how FPIC (Free, Prior and Informed Consent) was applied and how any displacement or access restrictions were addressed.

They must also explain how they conducted stakeholder engagement by answering:

 How did you engage and consult with local stakeholders (including local communities, Indigenous Peoples, and governments)? How did you ensure that their feedback was incorporated, and that diverse and marginalized voices were included?

We outline requirements for these consultations in detail in our <u>Handbook</u> under <u>"Safeguards, Co-benefits and SDGs: Have a Robust Stakeholder Engagement Process."</u> These requirements include ensuring the consultations are held in the local language, advertised so that people can attend and have notice, and transcribed and documented for transparency. The goal of these meetings should be to address grievances and collaborate on plans to share benefits and implement projects respectfully.

In order to <u>'Mitigate Risks with Safeguards'</u> project developers must do their work to understand the local contexts, including land use regulations, policies and management methods.

- 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow

As displayed in the pdf of the project proposal listed on the <u>"Project Proposal Flow"</u> page of the Handbook, we require project developers to provide an assessment of the environmental and social risks, and their plans to mitigate them. These are validated by the independent VVB / auditor.



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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#monitoring-and-validation

"Safeguards, Co-benefits & SDG: Monitoring and Validation" explains our approach for MRV for these criteria. For each SDG and co-benefit / safeguard, project developers should have a plan for ongoing monitoring. This gets assessed by the VVB during project validation. We are looking for specific safeguard and co-benefit validators and are following market trends on the best approach to monitor these fields.

#### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#labor-rights-and-working-conditions

In the Handbook <u>"Safeguards, Co-benefits & SDGs: Labor Rights and working Conditions"</u> we articulate that the health and safety must be ensured by project proponents. This includes providing safe and healthy working conditions. Project developers must describe how they do this in the project proposal flow, as demonstrated in the PDF on the <u>"Project Proposal Flow"</u> page in the Handbook. *(Question: "Health and Safety" under "Labor and Working Conditions")*.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#labor-rights-and-working-conditions

In the Handbook <u>"Safeguards, Co-benefits & SDGs: Labor rights and Working Conditions"</u> we articulate that project developers must ensure they treat workers fairly, avoid discrimination and ensure equal opportunities for workers. Project developers must describe how they do this in the project proposal flow, as demonstrated in the PDF on the <u>"Project Proposal Flow"</u> page in the Handbook (see question: 'Fair Treatment and Non-Discrimination" under "Labor and Working Conditions").

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#labor-rights-and-working-conditions

In the Handbook <u>"Safeguards, Co-benefits & SDGs: Labor Rights and Working Conditions"</u> we include provisions to ensure that project developers are not using forced labor, child labor, or trafficked labor. It also states contract workers must be protected and allowed to form worker's organizations without retaliation. Project developers must demonstrate this in the project proposal flow. (See the PDF on the <u>"Project Proposal Flow"</u> page, questions: "Child and Forced Labor Protections" and "Contract Workers' Rights" under "Labor and Working Conditions").

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#labor-rights-and-working-conditions

All of these are required fields for project developers to address in their project proposal flow, (as shown in the pdf on the <u>"Project Proposal Flow"</u> page) which then gets assessed during project validation. See section 4 of the <u>Validation Report Template</u>, which can be found in the Handbook page: <u>Third-Party</u>

Validation and Verification.

## 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

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#resource-efficiency-and-pollution-prevention}$ 

The <u>project proposal flow</u> asks explicitly about how the project developer ensures resource efficiency and prevents pollution (see questions under "Resource Use"). It requires project developers to describe the steps they are taking to reduce polluting emissions, pollutant discharges to water and waste, noise vibrations and generation of waste including hazardous materials, pesticides and fertilizers.

This is also described in our Handbook: <u>"Safeguards, Co-Benefits & SDGs: Resource Efficiency and Pollution Prevention"</u> where we also advise project developers with a material water usage to monitor water usage against baselines.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#resource-efficiency-and-pollution-prevention

All of these are required fields for project developers to address in their project proposal flow, (as shown in the pdf on the PDF on the "Project Proposal Flow" page) which then gets assessed during project validation. See section 4 of the Validation Report Template, which can also be found in the Handbook page: Third-Party Validation and Verification.

#### 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.

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#land-rights-and-involuntary-resettlements}$ 

The project proposal flow asks explicitly about how the project developer ensures they have plans to address and avoid any possible physical and economic displacement risks. Project developers are asked how FPIC principles were adhered to (see the pdf on the <u>"Project Proposal Flow"</u> page, questions *"Land & Territories"*).

In the Handbook, "Safeguards, Co-Benefits & SDGs: Land Rights and Involuntary Resettlements further outlines the steps project developers must follow, including specific definitions for displacement and remedial steps, if necessary. This includes providing adequate shelter, safety, education and economic opportunities for those affected.

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



whether the mitigation activity results in forced physical and/or economic displacement.;
 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)

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#land-rights-and-involuntary-resettlements

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Land Rights and Involuntary Resettlements"</u> states that project developers must describe any potential reasons for economic or physical displacement due to implementing their project. They must then describe their plans to address these risks and provide documentation of mitigation plans for physical displacement.

Questions pertaining to physical and economic displacement and their related mitigation measures are required fields for project developers to address in their project proposal flow, (as shown in the pdf on the PDF on the "Project Proposal Flow" page) which then gets assessed during project validation. See section 4 of the Validation Report Template . (This can also be found in the Handbook page: Third-Party Validation and Verification).

#### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdqs#biodiversity-conservation-and-sustainable-management

The Handbook page <u>"Safeguards, Co-benefits & SDGs: Biodiversity Conservation and Sustainable Management"</u> describes the principles project developers must adhere to in regards to biodiversity conservation. This includes an emphasis on ensuring reducing negative impacts on terrestrial and marine biodiversity and ecosystems. We ask project developers to describe how they've ensured this in their project proposal flow (see question "Avoidance of Harm" under "Biodiversity Conservation").

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#biodiversity-conservation-and-sustainable-management

The Handbook page <u>"Safeguards, Co-benefits & SDGs: Biodiversity Conservation and Sustainable Management"</u> describes the principles project developers must adhere to in regards to protecting habitats and ecosystems. This includes prioritizing the protection of habitats of rare, threatened, and endangered species. Projects should contribute to habitat connectivity where possible. We ask project developers to describe how they've ensured this in <u>their project proposal flow</u> (see question "Habitat and Ecosystem Protection" under "Biodiversity Conservation").

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#biodiversity-conservation-and-sustainable-management

The Handbook page <u>"Safeguards, Co-benefits & SDGs: Biodiversity Conservation and Sustainable Management"</u> states how projects must avoid converting high conservation value habitats such as natural forests, grasslands, and wetlands. We ask project developers to describe how they've ensured this in <u>their project proposal flow</u> (see question "Avoidance of Harm" under "Biodiversity Conservation").

## 4) minimises soil degradation and soil erosion.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#biodiversity-conservation-and-sustainable-management



The Handbook page <u>"Safeguards, Co-benefits & SDGs: Biodiversity Conservation and Sustainable Management"</u> how projects must be able to describe practices used to increase soil health, including monitoring techniques employed to be able to assess potential impacts. We ask project developers to describe how they've ensured this in <u>their project proposal flow</u> (see question "Soil and Land Protection" under "Resource Use").

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#resource-efficiency-and-pollution-prevention

Under <u>Safeguards</u>, <u>Co-benefits & SDGs: Resource Efficiency and Pollution Prevention"</u> we specify how project developers should monitor their water usage. This includes that project developers should monitor water usage against baselines. Effort should be taken to ensure water usage is kept to a minimum. We ask about resource efficiency in our <u>project proposal flow</u> (see question "Water Use and Efficiency" under "Resource Use"),

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#biodiversity-conservation-and-sustainable-management

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Biodiversity Conservation and Sustainable Management"</u> states how project developers should ensure they avoid negative impacts to biodiversity. We encourage project developers to conduct a biodiversity baseline assessment to monitor potential impacts.

Questions pertaining to biodiversity and sustainable management are required fields for project developers to address in their project proposal flow (as shown in the pdf on the PDF on the "Project Proposal Flow" page) which then gets assessed during project validation. See section 4 of the Validation Report Template. (This can also be found in the Handbook page: Third-Party Validation and Verification).

# 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 <u>United Nations Declaration on the Rights of Indigenous Peoples</u> and ILO Convention 169 on Indigenous and Tribal Peoples.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#human-rights-and-indigenous-peoples

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page we specifically ask project developers how their project accounts for the rights, interests and livelihoods of Indigenous Peoples, local communities and cultural heritage (see questions under "Stakeholder Engagement and Human Rights").

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Human Rights and Indigenous Peoples"</u> further explains that project developers must demonstrate respect for the rights, interests, and livelihoods of Indigenous Peoples and local communities.

As a general principle to, the section <u>"Mitigate Risks with Safeguards"</u> requires project developers to ensure they're aligned with all international laws, specifically the UN Declaration on Rights of Indigenous Peoples and the International Bill of Human Rights.



# 2) identifies the rights-holders possibly affected by the mitigation activity (including customary rights of local rights holders).

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#human-rights-and-indigenous-peoples

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page we specifically instruct project developers to identify the affected rights holders and explain how they may be impacted by the project (see question "Respect for Rights and Cultural Heritage" under "Stakeholder Engagement and Human Rights").

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Human Rights and Indigenous Peoples"</u> further outlines the steps that are required for identifying rights holders, which include mapping of local communities and Indigenous territories within or near the project boundary, and maintaining documentation of all identified stakeholders and their respective rights claims.

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

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#human-rights-and-indigenous-peoples}$ 

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page we ask project developers to describe how they've done this (*see question "Stakeholder Engagement Process" under "Stakeholder Engagement and Human Rights"*).

They're also instructed to think about FPIC principles when assessing indirect and cumulative impacts of their project on indigenous land, as described in our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Human Rights and Indigenous Peoples</u>". Project developers must apply the FPIC process in their stakeholder engagement procedure, when applicable. They must also adhere to the UN Declaration on the Rights of Indigenous Peoples.

# 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.

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#human-rights-and-indigenous-peoples}$ 

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page we ask project developers to describe how the FPIC process was applied and whether any displacement or access restrictions were addressed through this process. this (see question "Lands & Territories" under "Stakeholder Engagement and Human Rights").

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Human Rights and Indigenous Peoples"</u> further outlines how project developers must identify and assess any indirect or unintended impacts on IPLCs or their cultural heritage, including changes in land use patterns, migration, economic displacement, or increased pressure on local resources. They must employ land and territorial safeguards to ensure land rights are not infringed upon.

# 5) preserves and protects cultural heritage consistent with IPs & LCs protocols/rules/plans on the management of cultural heritage or UNESCO Cultural Heritage conventions.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#human-rights-and-indigenous-peoples

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, project developers are required to describe how cultural heritage is preserved, protected and promoted (*See question "Respect for Rights and Cultural Heritage" under "Stakeholder Engagement and Human Rights".* 

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Human Rights and Indigenous Peoples"</u> states that where applicable, the developer should adhere to recognized frameworks such as community-led heritage management plans and the UNESCO Convention for the Safeguarding of Intangible Cultural Heritage, prioritizing free, prior, and informed consent (FPIC) and locally defined values of cultural significance.



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).

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#human-rights-and-indigenous-peoples

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Human Rights and Indigenous Peoples"</u> states how project developers should ensure they avoid negative impacts to IPs & LCs, including through indirect and cumulative impacts.

Questions pertaining to impacts to IPs & LCs are required fields for project developers to address in their project proposal flow (as shown in the pdf on the PDF on the "Project Proposal Flow" page) which then gets assessed during project validation. See section 4 of the <u>Validation Report Template</u>. (This can also be found in the Handbook page: <u>Third-Party Validation and Verification</u>).

#### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#labor-rights-and-working-conditions

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, project developers must describe their procedure for ensuring that projects ensure equal opportunities and avoid discrimination (see question "Fair Treatment and Non-Discrimination" under "Labor and Working Conditions.")

Our Handbook page "Safeguards, Co-Benefits & SDGs: Labor Rights and Working Conditions" states that project developers must avoid discrimination and ensure equal opportunities.

# 2) abides by the <u>International Bill of Human Rights</u> and universal instruments ratified by the host country.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#mitigate-risks-with-safeguards

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#mitigate-risks-with-safeguards

In order to mitigate risks with safeguards, the Handbook page <u>"Safeguards, Co-Benefits & SDGs: Mitigate Risks with Safeguards"</u> instructs project developers to review and align their operations to the International Bill of Human Rights.

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, project developers are required to adhere to labor rights and regulations and provide documentation for how they do so. This is ensured in our project proposal through asking project proponents to list any local host country labor rights and regulations that the project must adhere to, including laws on labor and working conditions, worker's organizations, non-discrimination and equal opportunity (see question "Legal Compliance" under "Labor and Working Conditions").

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

 $\frac{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#have-a-robust-stakeholder-engagement-processes$ 

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, project developers must demonstrate how they've engaged stakeholders in their project. We ask them to describe how their project conducted stakeholder engagement and incorporated feedback into the project (*see question "Stakeholder Engagement Process" under "Stakeholder Engagement and Human Rights"*).

It also asks about how they've incorporated Indigenous and Local Knowledge in the design of their project





(see question "Indigenous Peoples and Local Communities" under "Stakeholder Engagement and Human Rights").

We also outline our policy on Stakeholder Engagement and what their process should look like in the Handbook, "Safeguards, Co-Benefits & SDGs: Have a Robust Stakeholder Engagement Process."

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#have-arobust-stakeholder-engagement-processes

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs"</u> states how project developers should ensure they are engaging stakeholders and respecting human rights.

Questions pertaining to these areas are required fields for project developers to address in their project proposal flow (as shown in the pdf on the PDF on the "Project Proposal Flow" page) which then gets assessed during project validation. See section 4 of the <u>Validation Report Template</u>. (This can also be found in the Handbook page: <u>Third-Party Validation and Verification</u>).

#### 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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#gender-equity

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, project developers must demonstrate that gender equity and social inclusion are integrated into the governance, design and implementation of their project. This includes equal pay, leadership opportunities and prevention of violence or harassment (*see question "Gender Equity" under "Equity and Inclusion"*).

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Gender Equity"</u> explains how to do this in more detail and provisions to include to create an inclusive environment.

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).

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#gender-equity

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs: Gender Equity"</u> states how project developers should ensure social inclusion practices are honored.

Questions pertaining to these areas are required fields for project developers to address in their project proposal flow (as shown in the pdf on the PDF on the "Project Proposal Flow" page) which then gets assessed during project validation. See section 4 of the Validation Report Template. (This can also be found in the Handbook page: Third-Party Validation and Verification).

#### 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.

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#benefits-haring}$ 

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow" page</u>, projects must include a benefit-sharing plan (e.g. a defined percentage) and describe how it was developed in consultation with affected communities, or how they will prepare to do so (*see "Benefit-Sharing Plan" under "Community Benefit-Sharing"*).

Further principles for establishing a Benefit Sharing Program are laid out in the Handbook page <u>"Safeguards,"</u> Co-Benefits & SDGs: Benefit Sharing."

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.

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#benefits-haring}$ 

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page projects must include a benefit-sharing plan and how it was communicated to affected communities (*see "Benefit-Sharing Plan" under "Community Benefit-Sharing"*).

Further principles for establishing a Benefit Sharing Program are laid out in the Handbook page <u>"Safeguards,"</u> Co-Benefits & SDGs: Benefit Sharing."

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

 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#benefit-sharing}$ 

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page projects must include a benefit-sharing plan and how it will be made accessible and transparent (*see "Benefit-Sharing Plan" under "Community Benefit-Sharing"*).

The Handbook page <u>"Safeguards, Co-Benefits & SDGs: Benefit Sharing"</u> states that benefit sharing provisions will be made publicly available along with the project proposal documents.

# 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 <u>decision 1/CP.16 of the United Nations Framework Convention on Climate Change</u>.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#cancun-safeguards

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, REDD+ projects must adhere to Cancun safeguards (see question "Alignment with Cancun Safeguards" under "REDD+ Specific").

### 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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#alignment-to-sustainable-development-goals

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, projects must indicate which SDGs their project aligns with.

The Handbook page "Safeguards, Co-Benefits & SDGs: Alignment to Sustainable Development Goals" provides an explanation of these goals and how project developers can assess their project.

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#alignment-to-sustainable-development-goals

The Handbook page "Safeguards, Co-Benefits & SDGs: Alignment to Sustainable Development Goals" includes a section on "Measuring Impact on SDGs" which references the list of indicators provided by the UN for each goal which can be used by project developers to discern how their project fits in.

We request that project developers describe how their project aligns with the SDG

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

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs#alignment-to-sustainable-development-goals

The Handbook page "Safeguards, Co-Benefits & SDGs: Alignment to Sustainable Development Goals" includes a section on "Measuring Impact on SDGs" which references the list of indicators provided by the UN for each goal which can be used by project developers to discern how their project fits in. "Monitoring and Validation" then describes that impacts should be included in monitoring and quantification after project implementation, and validated by an accredited VVB during project validation.



## 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.

#### https://docsend.com/view/ecb77yuysd87dhui

Methodologies must adhere to our Methodology Requirements. Section 4 "Additionality" describes our requirements for meeting additionality which includes an assessment of existing laws and regulations in order to ensure that the carbon reductions are not incentivized by anything other than carbon credit revenues.

Expert panelists are instructed to reference these methodology requirements prior to approving the methodology to ensure these principles are included. Projects are then assessed by a VVB against the methodology to ensure that they are meeting the necessary additionality requirements as described in the methodology. See section 4 of the  $\overline{\text{Validation Report Template}}$ . (This can also be found in the Handbook page: Third-Party Validation and Verification).

# 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.

### https://docsend.com/view/ecb77yuysd87dhui

This is covered in <u>Section 4 of our Methodology Requirements</u> which state our additionality requirements, which state that carbon reductions must only occur because of revenue from carbon credits. In other words, projects must be compared to a baseline scenario where no carbon credit revenue exists (i.e., business-as-usual).

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

 $\frac{https://docs.google.com/document/d/1gkJbL7d-l0kqyAEpMDCv7qF6pm5giAUgCw4c7JSs9Bs/edit?}{tab=t.0\#heading=h.1hiaod8s4ur3}$ 

The <u>Validation Report Template</u> gives instructions for VVBs to follow when conducting their review. Application of Methodology is laid out in section 4 and is a key finding of their validation report—including additionality and baseline scenarios. They must ensure that the project developer has described a valid baseline scenario, and that all additionality requirements have been met.

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

# https://open-carbon-protocol.gitbook.io/ocp-handbook/governance/annual-audit-process#methodology-review--audit

We review additionality guidelines and baselines processes in our annual audit process. This is laid out in our Handbook page "Annual Audit Process: Methodology Review + Audit." Every year, an audit team assembled of OCP employees, scientific advisor, compliance expert, and ad-hoc sector expert review methodologies specifically checking for: continued conservativeness in baseline and emission reduction / removal calculations to ensure no over-crediting, and any change in regulations or laws that may have impacted additionality.

# 5) Which of the following methods below are used to assess that credited mitigation activities are additional:



<b>~</b>	Barrier analysis
<b>~</b>	Common practice / market penetration analysis
<b>~</b>	Investment, cost, or other financial analysis
<b>~</b>	Performance standards / benchmarks
<b>~</b>	Legal or regulatory additionality analysis
<b>~</b>	Other (please explain below)

#### https://docsend.com/view/ecb77yuysd87dhui

All of the methodologies use at least one of the methods listed, depending on what is most applicable to the project type. Details on this can be found in section 4 of the Methodology Requirements. The methodology writer and expert panel will work on the best approach and agree before the methodology gets approved. Details on this process can be found on the Handbook page "Methodology Development, Feedback & Approval."

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:

https://docsend.com/view/ecb77yuysd87dhui

As described in <u>Section 4 of the Methodology Requirements</u>, if a methodology curator wishes to propose the use of a 'positive list' of project parameters that are automatically additional, they must provide evidence on how that positive list was created. The positive list must be approved by the expert panel before it's published.

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

https://docsend.com/view/ecb77yuysd87dhui

As described above, in <u>section 4 of the Methodology Requirements</u> if a methodology curator wishes to propose the use of a 'positive list' of project parameters that are automatically additional, they must provide evidence on how that positive list was created. The positive list must be approved by the expert panel before it's published.

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?

https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval

The only way a project activity would be automatically additional would be through the positive list approach, as described above. The additionality approach must be approved by the expert panel, as described in the Handbook page "Methodology Development, Feedback & Approval." We do not assign this on a program level.

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:

 $\underline{\text{https://open-carbon-protocol.gitbook.io/ocp-handbook/methodologies/methodology-development-feedback-and-approval}}$ 

As listed above, we provide multiple market recognized approaches to address additionality and put them through rigorous review to ensure they are appropriate to the project type.



#### 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:

### https://pilot.ocp.earth/all-methodologies

The Open Carbon Protocol (OCP) is sector-agnostic and accepts methodologies and project types proposed by external stakeholders. As such, we do not predefine eligible sectors; however, any activity type supported by our program must be governed by an approved methodology that includes a robust permanence assessment.

As a result, methodologies under our program must include both **technical and qualitative permanence review procedures**, along with **buffer pool deductions and annual monitoring requirements**.

We maintain a **sector-level reference page** where the treatment of each ICVCM criterion—including permanence—is transparently outlined and tailored to the specific risks and characteristics of each sector and activity type.

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)

### https://docsend.com/view/ecb77yuysd87dhui

All projects are required to disclose how they meet permanence conditions, regardless of project type. This is described in the Handbook page <u>"Project Proposal Flow"</u> and is evaluated during the methodology development and project validation stages.

While our program does not prescribe a fixed materiality threshold (e.g., a set number of tonnes) at the program level, each methodology must define a materiality threshold for reversal that is appropriate to the risk profile and context of the mitigation activity. Section 8, "Permanence & Durability" of the Methodology Requirements describes how to approach this. This threshold determines the scale of reversal that triggers a required response—such as buffer contribution adjustments, project remediation, or credit cancellation.

In addition, all reversal events—regardless of size—must be documented and disclosed to maintain transparency. This ensures early detection of risks and provides an incentive for conservative credit issuance.

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.

### https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/project-proposal-flow

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, we require all projects to perform a reversal risk assessment, including potential causes, relative scale and relative likelihood under the question of "Permanence". This is assessed and approved by the third-party Validator in document review and site visits, and all information is published on the registry.

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.

#### https://docsend.com/view/ecb77vuvsd87dhui

As described in the <u>Section 8 "Permanence & Durability" of the Methodology Requirements</u>, we require all project types to include a complete monitoring plan for both project activities and reversal/non-permanence risks. Methodologies must describe monitoring techniques which could include ongoing monitoring or early warning systems depending on the project type. Projects are asked about how they monitor the necessary variables in the project proposal flow.

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?

### https://docsend.com/view/ecb77yuysd87dhui

As shown in the pdf of the project proposal flow on the <u>"Project Proposal Flow"</u> page, all projects are required to disclose how they meet permanence conditions, regardless of project type.

<u>Section 8 "Permanence & Durability" of the Methodology Requirements</u> ensures methodologies define a set of sector-specific mitigation measures aligned with the risks identified in the Reversal Risk Assessment. Project developers are required to adopt and implement these measures as part of their Project Proposal.

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?

### https://docsend.com/view/ecb77yuysd87dhui

For all sectors and activity types identified under CORSIA Requirement 9.1, our program requires mitigation measures to be embedded in both the methodology design and project implementation phases to address identified risks of reversal.

Per <u>Section 8 of the Methodology Requirements</u>, **Methodologies must include a Risk Mitigation strategy that identifies potential causes of reversal and outlines mechanisms to reduce those risks.** This should include estimates of reversal risk and appropriate safeguards—such as buffer pools or insurance—to address underperformance. High-risk events should have defined remediation plans, which may involve restoring carbon stocks, drawing from the buffer pool, or canceling credits. We partner with Kita.earth to guide buffer pool contributions based on the methodology.

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?

### https://pilot.ocp.earth/terms-and-conditions

Per section <u>9.8.7 of the OCP Terms of Service</u> which all project developers must agree to, they agree to inform the OCP of any incorrect or inaccurate information. This includes information on reversals which would impact the amount of credits which should have been issued for a project. Once the OCP has been informed, they will cancel and compensate for credits as needed.

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.

# https://pilot.ocp.earth/terms-and-conditions

Per section <u>9.8.7 of the terms of service</u>, project developers must let the OCP know of inaccurate information within 5 business days of being made aware of the incident.

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.

https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/mitigating-project-risk-insurance-and-buffer-pool

Once the project developer has informed us of inaccurate information, the OCP is responsible for managing the compensation process via our partnership with Kita.earth. This is described further in the Handbook page "Mitigating Project Risk: Insurance and Buffer Pool."

### 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.



 $\underline{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs\#labor-rights-and-working-conditions}$ 

As shown in the pdf of the project proposal flow on the "Project Proposal Flow" page, project developers must describe their procedure for ensuring that projects comply with local and national laws, statues and other regulatory frameworks (see questions under "Labor Rights and Working Conditions"). This is then validated by a third party VVB to make sure its principles are accurate and aligned with the methodology proposed.

In the Handbook page <u>"Safeguards, Co-Benefits & SDGs: Labor Rights and Working Conditions"</u> we further outline these procedures.

# 2) Confirm that your program demonstrates it complies with social and environmental safeguards. https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/safeguards-co-benefits-and-sdgs

Our Handbook page <u>"Safeguards, Co-Benefits & SDGs"</u> describes the areas of environmental and social safeguards that project developers must adhere to and report as part of the Project Proposal.

We reference IFC Safeguard Standards to guide projects' environmental and social risk assessments. We require all project developers to understand the local contexts, seek guidance from reputable sources, and align with FPIC principles where necessary.

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.

 $\frac{https://open-carbon-protocol.gitbook.io/ocp-handbook/projects/third-party-validation-and-verification\#whatis-the-objective-of-the-validation-report$ 

Safeguards against environmental and social risks are assessed by third party Validators as part of the Validation process. This assessment (institution performing and the processes and procedures used) is published on the OCP registry as part of the project documentation. We reference IFC Safeguards as a source for project developers. See Section 4 of the Validation Template.

**End Copy of Application**