

Program Name: Oncra

Organization: Oncra

Assessment Type: Non-CORSIA Program Level Assessment

Date of Submission: 1 April 2026

Downloaded On: 5 May 2026

Status: In Review

Background

Must Read

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

We have reviewed the Assessment Framework background materials.

Yes

Methodologies for Exclusion

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

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

N/A

A – Governance

1.1 Effective Governance - CORSIA

CORSIA requirements related to governance framework:

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

As of January 2026, Oncra is a separate legal entity, stewarded by the Climate Cleanup Foundation, The Staff and Board of Oncra are:

Climate Cleanup Board

- Sven Jense, Secretary, interim director • Ruud Koornstra, Chairman of the Board • Ruurd Priester, board member
- Laura Rooseboom, board member • Donald Pols, board member

Oncra Management Team (board of directors)

- Sven Jense - CEO
- Gijs Tolmeijer - COO

Oncra Senior Staff

- Hanny van Hout - Operations Manager & department lead • Jelle de Bijl - Construction stored carbon Manager
- Julie Hablé - Construction stored carbon Manager
- Hajna Thijssen - Land, Rock, Ocean stored carbon Manager • Manuela Gutierrez - Regulatory & Compliance Manager
- Tana Viviers - Financial accounting

<https://oncra.org/about-us/>

See Guidelines section 2. Governance <https://oncra.org/guidelines/>

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

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

See Guidelines section 2. Governance figure 1: Organogram, Climate Cleanup Foundation and Oncra BV organisational structure.

<https://oncra.org/guidelines/>

This organogram showcases the internal relations and decision power between departments and the corresponding managers as stated in question 1.

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

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The Oncra Guidelines Section 1 reads: "Oncra is a nature-based carbon removal certification scheme and accounting standard stewarded by the Amsterdam-based Climate Cleanup Foundation. Designed to bring reliability and trust to nature-based climate actions, Oncra provides measurement-based, efficient carbon accounting. Our primary objective is to facilitate transition finance for regenerative entrepreneurs, bridging the investment gap for systems like agriculture, seaweed production, and bio-based construction materials. Rather than treating carbon credits merely as novel financial commodities, Oncra issues Carbon Removal Units (CRUs) to raise transition funds from non-polluting industries, governments, and individuals. Each CRU represents one tonne of CO2 actively removed and safely stored through natural processes.

To ensure high integrity and market confidence, Oncra builds its foundation on ISO-based, data-driven empirical accounting processes rooted in radical transparency. Importantly, our framework eliminates upfront certification costs for small-scale removers, which fosters innovation and ensures broader, more equitable market participation. Our standard is strictly aligned with the highest regulatory and voluntary market benchmarks. We

closely follow the European Commission's upcoming Carbon Removal and Carbon Farming (CRCF) Regulation, integrating the rigorous EU Q.U.A.L.I.T.Y criteria: Quantification, Additionality and baselines, Long-term storage, and Sustainability. Furthermore, our scheme is designed to adhere fully to the Integrity Council for the Voluntary Carbon Market (ICVCM) Core Carbon Principles (CCPs) and the Oxford Offsetting Principles.

A defining feature of Oncra is its holistic approach to planetary health, ensuring that climate action goes hand-in-hand with robust biodiversity and social safeguards. By utilizing the framework of Doughnut Economics, we seamlessly integrate the UN Sustainable Development Goals with the Stockholm Resilience Centre's Planetary Boundaries. All nature-based removals permitted within our accounting framework are inherently regenerative, meaning they are verified to do more good than harm to both human and natural ecosystems.

Ultimately, Oncra recognizes that the climate crisis cannot be solved in isolation. Our systemic approach guarantees that alongside verifiable carbon removal, our certified projects deliver vital life-supporting co-benefits such as clean water, restored habitats, and sustainable materials. By providing a trustworthy, transparent, and highly efficient certification pathway, Oncra empowers both project developers and buyers to tackle the climate and nature polycrisis simultaneously."

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

Yes

<https://oncra.org/about-us/>

On the public Oncra website, section 'About Us', explicitly lists the individuals and their roles responsible for programme administration, meeting the disclosure requirement.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Oncra publicly discloses how decisions are made in the Oncra guidelines in section 2 and website under the 'About Us' page. Governance. Oncra operates under a transparent two-tier governance model designed to prevent conflicts of interest. Strategic oversight and ultimate voting rights reside with the independent Climate Cleanup Foundation Board of Directors. This uncompensated, five-member board is responsible for high-level decisions regarding Oncra's mission, strategy, financials, audits, structure, management team nominations and appointments, annual plans, partnerships, accreditations, and other impactful decisions.

Within the mandate set by the Board, the steward-owned Oncra B.V. Management Team is responsible for daily operations and operational decision-making. To safeguard integrity, the Management Team maintains a clear functional firewall across the Certification, IT, Finance, and Regulatory & Compliance departments. This structural separation helps ensure that standard-setting, project assessment, registry administration, and compliance are carried out with clear division of roles and managed conflicts of interest.

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

Yes

<https://climatecleanup.org/wp-content/uploads/2024/10/Statutes-Climate-Cleanup-Foundation—GDPR.pdf>

The Foundation ultimately governing Oncra has been established in 2018, as the [Articles of Association](#) prove. Oncra has been operated by Climate Cleanup Foundation since the start in 2021, until last January when the programme was transferred into a steward-owned company structure. The current governance structure and organisational relations are explained in the guidelines section 2.1.

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

Yes

registry.oncra.org

The Registry shows how the first project was certified on 28-11-2021, and how it has been continuously

operational since.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Oncra is co-created by Climate Cleanup Foundation with two Dutch Provinces and advised by a Dutch bank, who have demonstrated ongoing willingness to make the program succeed. Please see the ecosystem partners listed on the homepage (<https://oncra.org/#partners>). These partners, as well as the over 30 connected Operators have benefit from Oncra's long term success. Budget calculations show that long-term obligations for core programme administration can be financed from programme income. For instance, because the Registry software is developed in-house there are no licensing costs and maintenance of core functionality is relatively easy. Oncra's strategy towards removal market stability is to align and aim to operate under the CRCF, especially now the EU Regulation is adopted. Requirements for CBs (verification bodies) are specified in Appendix 8, which includes a specification of an (at least) 40 year monitoring plan. In addition to the above, a formal dissolution plan has been developed and adopted, detailing a strategy for registry integrity.

Specifically, buffer pools of at least 20% are mandatory for projects with reversal risk. Chapter 5, Section 5.6 on Buffer Pool further specifies the buffer pool requirements, as well as the procedure that has to be followed after verification events prove under performance during the monitoring period. Requirements for CBs (verification bodies) are specified in Appendix 8, which now includes a better specification of an (at least) 40 year monitoring plan.

9) Confirm that your programme can demonstrate that it has a plan for possible responses to the dissolution of the programme in its current form

Yes

<https://oncra.org/dissolution/>

Oncra has a formal, adopted dissolution plan designed to ensure market continuity, protect stakeholder assets, and maintain the environmental integrity of our carbon credits in the event the program ceases to operate.

The plan dictates a structured, 365-day phased dissolution process overseen by an independent liquidator and a dedicated Dissolution Committee (Section 3). To guarantee market continuity, the plan mandates the preservation and transfer of all registry data and specifies that a Registry Trustee will maintain the technical infrastructure for a minimum of 24 months post-dissolution if no successor program is immediately found (Section 4.1).

Furthermore, the plan explicitly safeguards physical carbon assets by establishing a strict hierarchy for Buffer Pool resource allocation and a permanent escrow fund to ensure long-term monitoring obligations survive the organization's dissolution (Section 5). Finally, it includes comprehensive transition protocols for project developers, granting them the right and technical support to transfer their projects to successor programs without penalty (Section 6.1).

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The Oncra conflicts of interest framework is documented in the Guidelines and supported by the governance structure of Climate Cleanup Foundation. Under Section 2.4, board members, management and staff must not have any financial or other interest in removers or parties in removers' value chains that could create an actual, potential or perceived conflict of interest. Team members are required to declare the absence of conflicts of interest in their work contracts, and Annex 10 further sets out the formal Conflict of Interest Policy and Procedures, including disclosure requirements, review by the Compliance Officer, a confidential register of interests, and management measures such as recusal, reassignment, enhanced oversight, or exclusion from activities. Potential conflicts may also be raised and handled through the complaints and conflict resolution process in Chapter 2, Section 2.5.

The concern regarding separation of duties is also explicitly addressed in the Guidelines. Section 2.2 describes a clear functional firewall between departments, separating standard-setting, project intake and support, project assessment and review, registry administration, and compliance and sanctions. Annex 10.5 further states that staff responsible for credit issuance, tracking and registry management are organizationally and operationally separate from staff involved in project assessment, certification, and methodology development, and that no individual may hold responsibilities in both areas at the same time. This is intended to ensure independence of registry operations and prevent conflicts between programme delivery and registry control functions.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Oncra has formal policies and robust procedures to ensure that conflicts of interest are declared, assessed, and effectively isolated. Board members, Non-Executive Directors, Management, and Staff may not hold any financial or other interests in Removers or related value-chain parties that could compromise independence, and all team members must formally declare the absence of such conflicts in their contracts. Independence is reviewed annually by the Climate Cleanup Foundation Board, while the Compliance Officer conducts annual internal controls and records staff declarations. Climate Cleanup ambassadors have no formal or informal influence in the Climate Cleanup board decision making process.

If a conflict of interest or misconduct arises, Oncra's procedure is to immediately isolate the issue by putting the involved employee or contractor on non-active status. Oncra then conducts an investigation. If the conflict is confirmed, Oncra determines a resolution, communicates it to the individual, and if necessary, initiates the formal conflict resolution procedure outlined in the Conflict resolution policy. Following resolution, Oncra publicly communicates the misconduct and the outcome on its website, when appropriate. This framework is reinforced by Dutch legal requirements, ESG commitments, and broader corporate governance safeguards

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

the Registry is developed and maintained in-house, the responsible staff members operate under the same policies and procedures under the public benefit foundation as other staff. This is to say, in-house registry staff are legally bound by the same strict public benefit (ANBI) conflict-of-interest prohibitions as all other programme staff (See specifications under question 10 and 11).

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Registry staff are in the core team, including the ICT development, so they are held to the same obligations and procedures to declare, address and isolate potential conflicts of interest. Yearly the Board assesses potential conflicts, as set out in Guidelines section 2.4. Section 2.5 describes how misconduct is addressed, isolated and resolved. These sections mandate the yearly board assessment of independence and the exact operational steps to isolate and resolve conflicts if they arise among core team/registry staff or order stakeholders involved in the certification process such as Third Party (ies).

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

Yes

<https://drive.google.com/file/d/1mTabiaSX3l9FuryOVzs2nX-HAVYHif9G/view?usp=sharing>

A €5M liability insurance has been provided by HDI Global Specialty SE. The insurance policy is linked through the URL provided. It is updated yearly.

1.1 Effective Governance

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

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

Yes

<https://oncra.org/about-us/>

Oncra is stewarded by Climate Cleanup Foundation, which has an independent board of directors. The Guidelines state that the Foundation is independent from removers and buyers, that the board oversees Oncra's mission, strategy, financials, audits, structure, management appointments, annual plans, partnerships and accreditations, and that the board operates independently of all projects certified by Oncra. The Guidelines also state that ultimate voting rights are reserved to the Climate Cleanup board and that board member constitution and roles are publicly available on the Oncra website.

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

Yes

<https://climatecleanup.org/legal/>

As Oncra is stewarded by Climate Cleanup Foundation, the Foundation publishes annual reporting through its legal page. The Guidelines themselves refer to the Climate Cleanup legal page as the source for governance-related legal information. The annual reporting published there covers the organisation's mission, activities, governance and financial reporting.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

In addition to the guidelines, specifically under chapter 8: Requirements for projects: QUALITY Criteria 8.4 Sustainability – Doughnut Economics Framework; Oncra's obligations as a public benefit organisation under Dutch law (ANBI) ensure CSR compliance because these force Oncra to work for the public benefit, there is a dedicated ESG Oncra's website explicitly outlining the processes and commitments Oncra follows to guarantee corporate social and environmental responsibility.

Additional information can be found on: <https://oncra.org/about-us/esg/>

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Money laundering is excluded because all transactions have to be carried out through banks, which are obliged and held to strict anti-money laundering policies in most global jurisdictions. Also crypto payments may not be used. These obligations are described in Guidelines Section 10: "To prevent money laundering or other fraud, credit sales have to happen via Bank, excluding Cash or crypto payments. Upon request removers have to disclose their bank accounts to Oncra to exclude cash or crypto payments. This is enforced by Oncra as all sales have to be recorded in the Registry as detailed in Annex 6 Section 6.2 Certificates and Retirement". Similar to how cash and crypto payments are not allowed with Operators, Oncra is not allowed to use cash or crypto payments, which would also violate the character of rules set for public benefit organisations under Dutch law.

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

Yes

<https://climatecleanup.org/legal/>

Oncra combines internal operational requirements (Guidelines, Section 4.1.1) with foundational legal compliance mechanisms.

Bribery and corruption are forbidden by Dutch law per Article 328ter of the Dutch Criminal Code. Additionally, as part of Climate Cleanup Foundation, as a Public Benefit organisation (ANBI) forces the Foundation and Oncra, to maintain anti-bribery and anti-corruption guidance as encoded in Dutch and international law. Thus, as per Guidelines, Chapter 4: Certification Procedure, Sub-Section 4.2.1: Eligibility Check, Operators are held to abide by national and international law, including the United Nations Convention against Corruption (UNCAC).

1.2 Public Engagement, Consultation and Grievances - CORSIA

CORSIA requirements related to public engagement, consultation and grievances:

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

As per Guidelines, Chapter 4: Certification Procedure, 4.3 Registry Information Availability, at the moment of project pre-validation, Oncra adds all relevant information necessary to understand, monitor, and verify the certified project to the public Oncra's registry. Throughout the process the, Public disclosure of findings is updated in line with Oncra's open source philosophy. After Oncra Pre-validation and publication of the project with relevant information, all certification (validation) and re-certification (verification) reports are published on the Oncra Registry. A minimum 14 day public stakeholder comment period is utilized before reports are finalized.

Specifications about the procedure and the captured and shared information in the Registry is listed in Annex 6 (Registry procedures and requirements).

Additionally, public information dissemination and consultation to stakeholders is detailed in Guidelines Section 3.2: Procedures for creating and updating framework documents, specifically item 1. preparation, and 3: Expert & Public consultation.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Stakeholders Consultation Requirements are disclosed in Guidelines Section 8.5 Stakeholder Consultation. The section details Oncra's elaborate three track stakeholder process. FPIC principles and procedures are specifically detailed and also made available on Oncra's website. A standard Stakeholder Consultation form, which provides further operational guidance for the procedure, is found in Guidelines Annex 12.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Oncra establishes Procedures for creating and updating framework (guidelines and protocols) documents following 7 steps that are described in the Guidelines, Chapter 3, Section 3.2:

1. Preparation
2. Drafting, Creation or Update of a document
3. Expert and Public Consultation
4. Revision and Finalization

5. Implementation and Dissemination
6. Monitoring and Review
7. Documentation and Transparency.

Additionally, as part of Oncra's Internal Monitoring (Guidelines, Chapter 3, Section 3.3), Oncra maintains controlled versions of all general scheme documents, including manuals, policies, Guidelines, Protocols and Modules, and definitions of responsibilities and decision-making mandates throughout the Google Docs Enterprise edition tracking system. Current versions shall be publicly available on the website, and prior versions shall be retained to ensure traceability of changes. An example can be found: <https://oncra.org/guidelines/>

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Oncra conducts public comment periods for methodologies, protocols, and framework documents under development. The Guidelines state that Guidelines, Protocols and Modules are created and updated through a documented procedure that includes expert and public consultation. This procedure requires publication of the draft on a publicly accessible web location, collection of public feedback where applicable, and a public review period of at least 30 days. The Guidelines further state that these procedures apply to all documents that define the rules of the Oncra Framework, and that the documents and procedures are publicly accessible at all times.

Evidence: Oncra Guidelines, Section 3.2 "Procedures for creating and updating framework documents," especially "Expert & Public consultation" and the requirement for a "Public Review Period" of at least 30 days.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Oncra conducts public comment and stakeholder consultation processes relating to activities seeking registration or approval. The Guidelines provide that, for project activities, stakeholder consultation is part of the project requirements in Section 8.5. In addition, Section 4.4 states that where certification and re-certification result in immediately Delivered Units, a 14 day public consultation period is observed before the units are made available on the Registry. Section 4.6 further states that all certification and re-certification reports are published and subject to a minimum 14 day public stakeholder comment period before reports are finalised.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The public comment period for all documents, specifically the Guidelines (that includes information about operational activities such as ongoing stakeholder feedback), is allowed for at least a 30 day public review period (Guidelines, Chapter 3, Section 3.2.). This provision ensures room for quick iterations of details while preserving procedural rigor and transparency. As part of Oncra's Internal Monitoring (Guidelines, Chapter 3, Section 3.3), Oncra maintains controlled versions of all general scheme documents, including manuals, policies, Guidelines, and definitions of responsibilities and decision-making mandates throughout the Google Docs Enterprise edition tracking system.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The public comment period for all documents, specifically the Guidelines (that includes information or updated information about programme procedures or rulesets), is allowed for at least a 30 day public review period (Guidelines, Chapter 3, Section 3.2.). This provision ensures room for quick iterations of details while preserving

procedural rigor and transparency. As part of Oncra's Internal Monitoring (Guidelines, Chapter 3, Section 3.3), Oncra maintains controlled versions of all general scheme documents, including manuals, policies, Guidelines, and definitions of responsibilities and decision-making mandates throughout the Google Docs Enterprise edition tracking system.

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://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Under the Oncra programme, activities are strictly allowed only at the project-based level. Oncra does not permit or certify Programmes of Activities or Jurisdiction-scale activities.

This requirement is enforced at the very beginning of the Oncra certification process. When an Operator applies for certification, they must go through a mandatory "Eligibility check" (the first of a three-phase assessment flow). During this phase, the Operator must explicitly demonstrate that their intended activities are standalone Projects. Only after fulfilling this and other strict eligibility criteria—such as proving they are not registered with other carbon credit programs or receiving overlapping government subsidies—can the Operator sign a contract to proceed to the quantification and certification phases. The Oncra Guidelines defining these eligibility requirements are publicly available.

Evidence: Chapter 4: “”, Section 4.2: ‘Eligibility, Quantification and Pre-Validation, Sub-section 4.2.1: ‘Eligibility check’)

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://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Oncra's eligible activities are strictly limited to nature-based carbon removal. Based on our publicly available Guidelines. The general eligibility criteria requirements are defined in the Chapter 4, Section 4.2. In short:

- Project type: Only individual projects are eligible (not large-scale programmes or jurisdictional activities). Projects must focus specifically on carbon removal and cannot be registered with other carbon credit schemes or receive overlapping government subsidies for the same mitigation activity.
- Sectors covered: Activities must contribute to climate mitigation through carbon removal, while avoiding harmful sectors. Projects cannot be linked to fossil fuel extraction, unabated fossil power, or carbon-intensive transport, unless aligned with approved national transition plans.
- Environmental safeguards: Projects must not convert natural ecosystems (e.g., forests or wetlands), especially those with protected status, and must pass the Oncra's Project / Chain integrity assessment (including sustainability considerations).
- Geographic and regulatory scope: Oncra doesn't specify a geographic restriction, thus, projects can be implemented in any location, provided they comply with national and local laws, respect local communities, cultural heritage, and Indigenous rights, and align with relevant international conventions.
- Operator requirements: Project developers must disclose ownership (via KYC), demonstrate a clear climate mitigation objective, and commit to operating under Oncra's standards and protocols.

The activities are classified under four removal pathway categories: Constructions, Land, Rocks and Oceans. Each category is called 'xxx Stored Carbon', to stress Oncra's strict focus on carbon removal, an important eligibility criterium. For each removal pathway, the eligibility criteria consist of the above mentioned in the Guidelines under Section 4.2. and those specified in the Protocol specific to the Pathway.

Construction Stored Carbon allows bio-based construction projects and material chains (this CSC Protocol is split into two sections called Methods). Land Stored Carbon projects are open for all Operators that store organic carbon in soils, soil-life, plants and trees without harming the ecosystem (while improving it). Rock Stored Carbon projects are open to Operators developing Enhanced Rock Weathering practices that operate in ecosystems while doing them no net harm (these might be marine ecosystems if no significant harm can be proven). Ocean Stored Carbon projects are eligible if they work with natural processes and do no significant harm to the marine environment. These Protocols are available to the public at www.oncra.org/protocols.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 4: “”, Section 4.2: ‘Eligibility, Quantification and Pre-Validation, Sub-section 4.2.1: ‘Eligibility check’; Protocols:

1.2 Public Engagement, Consultation and Grievances

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

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Step-by-step procedures for how stakeholders are consulted is detailed in the Guidelines, Chapter 8: Requirements for projects: QUALITY Criteria, specifically under Section 8.5: Stakeholder information and consultation requirements. Sub-section 8.5.4 Information Package and Consultation Process. Also, a standard form (Annex 12. Oncra Stakeholder Consultation Form) which specifically includes FPIC principles and procedures, has been mentioned and a link has been attached in the guidelines.

The conflict resolution procedures (how disputes are resolved) are detailed in Section 2.5.

Evidence: Chapter 8: Requirements for projects: QUALITY Criteria, Section 8.5 'Stakeholder information and consultation requirements', Sub-section 8.5.4 Information Package and Consultation Process; & Annex 12. Oncra Stakeholder Consultation Form)

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The Liability and Complaints procedure outlined in the Guidelines, Chapter 2, Section 2.5: Conflict resolution policy, Sub-Section 2.5.3 Grievance procedure, details the process and ensures that fees shall not impede access ("2. A dedicated budget is defined by Oncra board and allocated to an independent third-party actor the complainant and Oncra board agrees on."). This quoted section proves that a pre-allocated budget exists specifically to remove financial barriers and ensure independent, third-party impartiality during the grievance process.

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

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

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The definition and underlying attributes of a Unit are given in the Guidelines, Glossary, defining concepts such as 'Carbon Removal Units (CRUs)', as well as 'Potential Units' and 'Delivered Units'. CRU are specified in more detail in Chapter 5, Section 5.2 Carbon Removal Unit (CRU) attributes. These exact sections formally define what constitutes a unit under the programme and list all guaranteed underlying attributes: Date of issuance, Unique serial number, Oncra project id, Current ownership, Ownership history, Sequestration status (potential or delivered), Ownership status (available, sold or retired), Date of Retirement, Registry Status (see below)

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Guidelines, Chapter 5, Section 5.3 define the Property aspects of Units (Registry Status Indications). These

status indicators are:

Holding: In holding buffer (can not be sold)

Potential: CRUs not yet Delivered, available for reservation or transfer under Pre-Purchase Agreements (See 5.4). Not CCP-eligible, no compensation claims allowed.

Brokered: Reserved for or sold to Broker (no claims). Transferred: Sold to Buyer (only attribution claims).

Delivered: Removal verified (ex post, 'carbon removed' or attribution claim).

Cancelled: Project integrity (partially) void by contingency or force majeure (Transactions are no longer possible if status is cancelled).

Void: No longer Oncra certified as procedures have been void without solidly documented contingency or force majeure reasons.

This is also supported by the Registry procedures and requirements in Appendix 6, which provides the operational registry procedures and requirements to ensure these property rights are tracked.

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

Yes

<https://registry.oncra.org>

Oncra Registry is developed and maintained in-house, and is continuously updated in line with evolving regulatory and principled requirements, including (among others) compatibility with ICVCM and CRCF.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Oncra has procedures in place to ensure that the Registry can transparently identify units that are CCP-approved. The Guidelines state that Potential Units do not meet the ex-post issuance requirement of the ICVCM Core Carbon Principles and therefore shall not carry the CCP-Approved label, while only Delivered Units that represent actual verified removal and storage are eligible for CCP-Approved labelling. The Guidelines further state that the Registry visually distinguishes CCP-Eligible status on each unit, and Annex 6 provides that, once approved, units meeting the requirements under the CCP protocols are easily distinguished within the Registry. The Registry also records unit status and ownership with appropriate access controls.

Evidence:

Oncra Guidelines, Section 5.4 states that only Delivered Units are eligible for CCP-Approved labelling and that the Registry visually distinguishes CCP-Eligible status on each unit. Annex 6.1 states that units meeting CCP protocol requirements are easily distinguished within the Registry. Annex 6.4 and 6.5 describe registry recording of unit status and access controls.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

These Procedures are included in Annex 6, detailing the end-to-end unit tracking procedures and summarizes the exact mechanism. The procedures are summarized as follows:

- Issuance transactions: these are prepared based on the calculations the project validator performs, these are checked by Senior management before issuance is logged in the registry by senior management.
- Purchase transactions : Removers facilitate the transactions and will inform the project admin team of the sale, providing proof of invoice and payment of invoice. These details are used in the preparation of the certificate, which is a unique number and is logged in the registry. The certificate is proof of the entry into the registry. Details captured on purchase: Name of buyer, date of payment for the transaction. This is by default also considered at the moment of the retirement of the unit, unless otherwise specified.

- Broker purchases: These are logged as to be retired certificates only once proof of purchase as noted above in the purchase transaction will the certificate be issued, and be the moment that that unit is considered to be retired.
- Cancellation of transactions: These transactions are considered ad hoc and can only be updated in the registry by senior management based on their professional scepticism, based on the information at hand in Verification Reports or - when conservative - at the Operators request.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The procedures for identifying unit status are explicitly defined as follows:

- Issuance Status (Section 6.1): Emission units are logged and issued into the public registry by the registry admin only after Senior Management reviews and approves the project onboarding. The registry captures full project details, including vintage, methodology, and CCP alignment.
- Retirement Status (Section 6.2): The registry differentiates between direct sales and broker sales. For direct sales, issuance and retirement occur simultaneously. For broker sales, units are held until the final purchaser is identified. Upon final sale, the Project Administrator issues a unique retirement certificate capturing the buyer's name, vintage, and reason for retirement. At this moment, the unit's status is permanently updated to "Retired" to prevent duplication.
- Cancellation Status (Section 6.3): Cancellations are handled as distinct, ad-hoc transactions. They are executed exclusively by Senior Management, and the specific reason for cancellation is permanently logged in the registry so that the decision can be easily understood and reconstructed.
- Public Visibility (Section 6.4 & 6.5): The status of each unit—whether available, sold/retired, or brokered—is clearly displayed in the public Registry for easy tracking. Public users can access these details with view-only permissions, ensuring complete transparency.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Projects included in the registry have a unique identifier. Units that are issued within the project all have a unique serial number, as well as each transaction. Unit attributes are listed in the guidelines under 5.2 Carbon Removal Unit (CRU) attributes, officially mandates unique serial numbers as a core unit attribute. Registry procedures are further explained in Annex 6, details the registry procedures for generating and assigning them.

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://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Each Unit is immutably connected to a Project, and for each Project the country of origin, vintage and registration dates are captured as part of the certification procedure (Guidelines, Chapter 5: 'Registry, Purchase Agreements, Communication Guidance') mandates the collection of country, vintage, and registration date data during certification; and recorded in the Registry as project Details as described in Guidelines Annex 6, which enforces their public designation in the registry

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The programme registry is managed in-house and operates with appropriate access controls, unique identifiers for each certificate, transaction and project, and clear status tracking for units. Registry access is secured through two-factor authentication (2FA) and role-based permissions, with restricted user rights and Senior Management oversight for key actions such as onboarding and transaction cancellations.

The programme registry is secured through a structured IT security system covering access management, transaction integrity, data protection, monitoring, and incident response. Access rights are granted based on role and need, critical actions require additional approval, key actions are logged in audit trails, backups are regularly tested, and the system is managed through a risk-based approach aligned with ISO 27001 or an equivalent framework.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Annex 6: 'Registry Management' and 'Registry Access Controls'; Chapter 3: 'IT Security of Certification Registry Systems')

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The programme registry conforms to international data exchange standards by ensuring that data exchanges are carried out in line with recognised international formats, such as XML, and are encoded and disclosed through Oncra's open source application programming interfaces (APIs). This interoperability is developed in close collaboration with carbon market ecosystem actors, including brokers.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Annex 6: 'Registry Management')

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Included in annex 6. Within registry access controls; the Registry is available to the public also without login, but user accounts are screened to the same level as Operators are screened; an e-mail address is needed and for any writing operations an ID check must have been carried out.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Included in annex 6. within onboarding of removers and the issuance of certificates, is detailed how "The Project Validator initiates the onboarding of the remover and the associated project into the system, and will do the necessary due diligence to ensure that the remover and the project are in line with these Oncra guidelines and checklists."

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Included in annex 6. under Auditing of the registry is detailed how the Registry is audited at the same intervals as the Oncra Framework and its financial transactions are audited. Additionally, Registry ICT carries out ongoing and yearly thorough (cyber)security assessments.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Annex 6: '6.6 Auditing of the Registry'; Chapter 3: '3.4 IT Security of Certification Registry Systems')

2.1 Effective Registries (Retirement and Addressing Erroneous Issuance)

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

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The entity retiring the Unit must be identified, also as a result of Oncra's adherence to the Oxford Offsetting Principles. In Oncra's interpretation of these Principles, buyers must already have a carbon abatement plan in place and cannot operate in carbon-intensive industries. To maintain this, Oncra identifies the buyer, and retirement certificates include the buyer's name, date of transaction, reason for retirement and unique identification number. A proportionality clause applies for small-scale buyers under 50 units, while for buyers above 1,000 units a KYC is required.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 7: 'Requirements for buyers: Oxford Offsetting Principles'; Chapter 9: 'Information disclosure policy'; Annex 6: 'Certificates and Retirement')

2) requires the identification of the purpose of retirement

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

The purpose of retirement is identified and recorded in the programme registry. Retirement certificates include the reason for retirement, and where Units are sold to a buyer, the registry is updated with the buyer's name and reasons for retirement.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Annex 6: 'Certificates and Retirement'; Chapter 5: '5.4 Purchase agreements for transition finance')

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Erroneous issuance and other integrity-related over-crediting risks are addressed through both cancellation and compensation through replacement. Administrative corrections can be implemented through ad-hoc cancellation transactions, while underperformance or avoidable reversal is addressed through buffer pool cancellation, replacement from other projects, or purchase of equivalent removals. The Remover or project developer is responsible for compensation and replacement measures, while registry cancellations are handled through the programme's cancellation procedures.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 5: 'Buffer Pools'; Chapter 8: ; Sub-Section 8.3.2: Risk Mitigation Measures'; Annex 6: 'Ad-hoc Cancellation Transactions')

3.1 Information - CORSIA

CORSIA requirements related to transparency:

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

This is a foundational principle for Oncra (the "O" in the acronym stands for Open). Data sharing is crucial to enable learning effects that exponentially grow positive climate impacts. Section 9.1 (Open data principle) strictly states that Oncra radically opens and shares all data, anonymizing data points only if they clearly endanger a business model. Furthermore, Section 4.6 (Public disclosure of findings) mandates that "In line with Oncra's open source philosophy, all certification (validation) and verification (monitoring) reports are published on the Oncra Registry" before any Certificates of Compliance can be provided.

3.1 Information

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

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

This is a crucial leading principle for Oncra; it might be its reason for existence. Especially also spreadsheets used for calculations are always publicly disclosed, and have to be not overly technical, as this enable learning-effects that will speed up the development of more and better removal projects. See Guidelines Chapter 9, and the specific data items listed in Section 4.2

2) a mitigation activity design document that includes:

i. a non-technical summary.

ii. detailed information on the mitigation activity, including its location and proponents.

iii. a description of the technology or practices applied.

iv. the environmental and social impacts.

v. the methodology used.

vi. information on how the methodology is and has been applied for the purpose of determining the baseline, demonstrating additionality and quantifying GHG emission reductions or removals.

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

activity design documents are published in the public Registry before any future Units can even be issued. Oncra uses an accessible format where all mandatory design document sections are published directly in the Registry under 'Project Details.' The explicit requirements for what must be included in these design documents—covering baselines, additionality, methodology, and environmental/social impacts—are strictly codified in Section 4.2 and Annex 5 of the Guidelines.

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

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

Because Oncra focuses exclusively on Nature-based carbon removal, publicly disclosing the exact monitoring and activity periods is of critical importance. The precise monitoring intervals and storage durations are determined by the applicable MRV Protocols and must be explicitly detailed within the certified Project Design Documents. To ensure full public transparency, this information is permanently published under the 'Project Details' section of the open Oncra Registry. Furthermore, Section 4.5 explicitly mandates that "In the Verification phase, the MRV Protocol specified in the Pre-Validation Statement has to be followed to reach reasonable assurance (supported with positive evidence) about the actual carbon removal" over the specified monitoring period.

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

Yes

<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>

All program documents, methodologies- calculations, and project-specific reports are available through the public Oncra Registry. The handling of missing information or external data requests is explicitly guaranteed through

Section 9.2 (Information disclosure policy), which states: "Requests for additional information are handled by the Onkra leadership with priority. If responses to information requests will take longer than two business weeks to respond to, new credit issuances will be paused to free up the team's capacity."

4.1 Robust Independent Third-Party Validation and Verification - CORSIA

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

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

Yes

<https://oncra.org/guidelines/>

Onkra enforces comprehensive procedures for validation and verification, carried out by independent Certification Bodies (VVBs). These requirements are detailed in Section 4.4 (Certification) and Section 4.5 (Verification). The process requires a rigorous review of project documentation, strict eligibility assessment, and on-site inspections for ex-post verification. Certification Bodies must follow strict ISO-defined protocols (ISO 14064-3 and ISO 14065) to ensure absolute integrity, transparency, and accuracy before any delivered carbon removal units can be issued.

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

Yes

<https://oncra.org/guidelines/>

Onkra has robust standards, requirements and procedures for verification of emissions reductions. These are detailed in Guidelines Section 4.5 on Verification and Section 4.6 on Public disclosure of findings. The verification process includes on-site inspections, data analysis, and assessment of monitoring reports. Certification Bodies must adhere to stringent guidelines to ensure the reliability and transparency of removal claims.

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

Yes

<https://oncra.org/guidelines/>

Standards and requirements for accreditation of validators are outlined in Guidelines Annex 7. This includes criteria for validator/verifier qualifications, independence, and competence, following ISO 14065:2020 on "General principles and requirements for bodies validating and verifying environmental information". Onkra has specific procedures for individual verifiers (Teams of one individual, refer ISO 14065:2020 7.3.4), because 1) small verification teams can help to leave more funds for actual removal, however 2) ensuring rigor of the process needs extra provisions, like explicit screening of competences, conflict of interest, and Team Lead rotation. These are detailed in Guidelines Section 4.5 (rotation), with the procedure for individual verifiers (including [intake form](#)) in Appendix 7.

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

Yes

<https://oncra.org/guidelines/>

In line with the proposed EU CRCF, validators and verifiers can be the same entity, denominated as Certification Bodies (CBs). Standards and requirements for accreditation of verifiers are outlined in Guidelines Annex 7, similar to those for validators. This includes criteria for verifier expertise, impartiality, and professional conduct. Please see previous answer.

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

Yes

<https://oncra.org/guidelines/>

Oncra procedures explicitly mandate the order of operations for third-party auditing to guarantee project integrity. As strictly codified in Annex 7 (Section 7.4.3 Intervals): "Validation of the Project Plan is required once per project duration period. Verification is required at specified monitoring intervals for the issuance of units. Validation and the first verification may be conducted simultaneously and by the same approved CB." The guidelines further specify in Section 4.3 that if they are conducted simultaneously at the first verification moment, the validation must logically be completed before the verification of actual removals can proceed.

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

Yes

<https://oncra.org/guidelines/>

Guidelines Section 4.5 on Verification requires that mitigation is measured and verified by an accredited and independent third-party verification entity (Certification Body). In addition, Oncra enforces strict procedures ensuring all mitigation outcomes are rigorously verified by an accredited and independent third-party Certification Body (CB). As codified in Section 7.4.2 of Annex 7 (Validation and Verification Processes for Certification Bodies), "During verification, a CB confirms that the outcomes set out in the project documentation have been achieved and quantified according to the program requirements." This verification process inherently requires measurement and auditing, and any failures identified during the CB's assessment are strictly classified as Critical, Major, or Minor non-conformities, preventing the issuance of any carbon credits until fully resolved.

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

Yes

<https://oncra.org/guidelines/>

Oncra strictly forbids the ex-ante issuance of tradeable carbon credits. Any units not yet strictly verified ex- post during the monitoring phase are classified merely as concepts. In the Registry, these are explicitly labeled as 'Potential Units' and are legally restricted to be sold only via pre-purchase agreements (CRPAs) to secure transition finance. Only after rigorous ex-post verification by a Certification Body are units marked as 'Delivered' and issued as actual Carbon Removal Units. Evidence: Chapter 5, Section 5.2 and 5.3; Glossary 'CRUs')

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

Yes

<https://oncra.org/guidelines/>

Strict provisions to manage and prevent conflicts of interest for validators and verifiers are enforced through Annex 10 (Conflict of Interest Policy and Procedures) and Annex 7. Third-party Certification Bodies are required to formally disclose any fiduciary relationships, familial ties, or financial interests related to the credits being evaluated. To isolate such conflicts, CBs must submit formal Independence Declarations (Template 3). If a conflict arises, rigorous separation of duties and conflict resolution documentation (Template 4) are mandated to ensure the absolute impartiality of the verification process.

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

Yes

<https://oncra.org/guidelines/>

Oncra requires rigorous disclosure of any Conflicts of Interest for all parties involved in the certification process (including Third Party (ies)), covering financial and fiduciary relationships related to the credits being evaluated. Specifically, under Guidelines, Annex 10.6 'Conflict of Interest Policy and Procedures', Third Party (ies) are requested to sign the Template 3: VVB Independence Declaration. Additionally, as part of the main Requirements

for Certification Bodies under Annex 7., 7.1.2 Independence and Impartiality.

Evidence: Annex 10: 'Conflict of Interest Policy and Procedures', Sub-section 10.6: 'Third-Party Validation and Verification Bodies'; & Chapter 2: , Section 2.4: 'Conflict of Interest and Misconduct Policy';)

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

Yes

<https://oncra.org/guidelines/>

As detailed in the Guidelines, Annex 7., 7.1.2 Independence and Impartiality "CBs are independent third-party entities or individuals. They must have procedures in place to ensure impartiality and avoid conflicts of interest". However, potential Conflicts of Interest (COI) are treated similarly to those that might arise in the Oncra team and Board, as detailed in Chapter 2: Governance, Sub-section 2.5 Conflict resolution policy.

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

Yes

<https://oncra.org/guidelines/>

Oncra strictly requires complete reassessment upon the renewal of any project. Validation requirements prescribe that Certification Bodies (VVBs) must assess the project comprehensively against current Oncra program rules, as detailed in Annex 7. Because determining and justifying the baseline scenario is an intrinsic, mandatory part of the core MRV Protocols that govern the project, a formal baseline reassessment mathematically and procedurally has to take place during any renewal or subsequent verification/monitoring interval to ensure the mitigation data remains accurate and additional.

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

Yes

<https://oncra.org/guidelines/>

The same procedures apply to activities undergoing delayed verification. Under the Oncra framework, the "allowable number of years between verification events" is strictly defined by the monitoring interval dictated in the project's specific MRV protocol (e.g., three years for certified soil carbon measurements). However, Section 4.5 clearly mandates that if an operator fails to conduct this required verification within that precise timeframe, "a leniency period of two years will be observed before the project's Potential Units will be cancelled." If the operator successfully completes the standard verification process within this two-year leniency window, the standard issuance rules resume and any validly removed units are delivered.

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

Yes

<https://oncra.org/guidelines/>

Oncra does not support the ex-ante issuance of valid Carbon Removal Units. As defined in the Glossary and Sections 5.2/5.3, unverified future removals are strictly categorized as 'Potential Units' which represent potentially stored carbon and cannot be used by buyers to offset emissions or make claims. Only units that have undergone complete ex-post verification are converted to 'Delivered Units' in the registry, ensuring total transparency and strict alignment with ICVCM's ex-post eligibility requirements.

4.1 Robust Independent Third-Party Validation and Verification

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

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

Yes

<https://oncra.org/guidelines/>

Oncra enforces strict, internationally recognized accreditation requirements for all Validation and Verification Bodies (VVBs/Certification Bodies). As explicitly codified in Annex 7 (Section 7.1 General Requirements), to be eligible to act under the Oncra scheme, an organization must "(a) hold valid accreditation under a recognised international accreditation standard for greenhouse gas validation and verification of mitigation activities. Recognised standards include, for example: ISO 14065 in combination with ISO 14066; or accreditation under the rules of the UNFCCC Kyoto Protocol Clean Development Mechanism (AIE/DOE status) or under the Paris Agreement Article 6.4 Supervisory Body." The accreditation must be issued by a nationally or internationally recognized accreditation body, and evidence of this status must be continually submitted to Oncra upon onboarding and at each renewal.

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

Yes

<https://oncra.org/guidelines/>

Oncra actively manages Certification Body (VVB) performance through structural oversight protocols defined in Annex 7 (Section 7.5 'Performance Review, Suspension and De-listing of VVBs'). Regular surveillance assessments are conducted to maintain accreditation, with a maximum period of five years between assessments. Furthermore, Section 4.3 dictates that failure by a CB to provide a complete and accurate assessment in accordance with ISO 14064-3 guidelines automatically triggers a formal performance review, which can result in the suspension or revocation of their participation in the program.

B – Emissions Impact

5.1 Methodology Approval Process - CORSIA

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

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

Yes

<http://oncra.org/protocols/>

The activities are classified under four removal pathway categories: construction, land, rock, and ocean. Each category is called 'xxx Stored Carbon', for example, Construction Stored Carbon. Oncra has a strict focus on carbon removal in these nature-based removal pathway categories. Each category has its own Protocol containing quantification metrics, eligibility criteria, and all protocols are publicly available.

Evidence: <https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf> subsection

4.2.2.: 'Oncra Project Assessment, Quantification and Pre-Validation, and subsection 8.1: 'Quantification: ISO Norms and Empirical Crediting'; <http://oncra.org/protocols/>

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

<https://oncra.org/guidelines/>

The process is explained in the Guidelines Section 3.2., which contains procedures for the core Oncra Framework documents (Guidelines, Protocols and Modules) which are also to be used for other relevant program documents.

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

<https://oncra.org/guidelines/>

ONCRA's programme process requires publication of the draft on a publicly accessible web location (usually on the ONCRA website), collection of public feedback where applicable, and a public review period of at least 30 days. The Guidelines further state that these procedures apply to all documents that define the rules of the Oncra Framework, and that the documents and procedures are publicly accessible at all times. The procedure is described in the Guidelines under Section 3.2.

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

Yes

<https://oncra.org/guidelines/>

Measurements and valid quantification methods are central to Oncra, as it tries to minimise modelling-based approaches by obligating measurement-based quantification wherever possible. This approach is described in the Guidelines under Section 4.2 (Quantification) and Chapter 8: 'Requirements for projects: QUALITY Criteria', Sub-section 8.1 Quantification (ISO Norms and Empirical Crediting), and is reflected in all four Protocols (sections on Quantification). For example in the Construction Stored Carbon Building level protocol, it is found under Chapter 4.1 Quantification. Additionally, Oncra is adopting the EU QU.A.L.I.TY criteria, which also stresses accurate and valid quantification.

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

Yes

<https://oncra.org/guidelines/>

Section 4.5 details "In the Verification phase, the MRV Protocol specified in the Pre-Validation Statement has to be followed to reach reasonable assurance (supported with positive evidence) about the actual carbon removal. This means that regular verification (re-certification) of the actual removal has to take place, assessed by an

independent Certification Body (VVB) with measurements and site visits unless specified otherwise.” As described in section 8.3, “Monitoring intervals are described in the respective Protocols and Modules, and are typically 5 to 15 years for biological systems and 10 years for geological storage”, and have to be performed throughout the crediting period.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 4, ‘Subsection 4.5 - Monitoring, Reporting and Verification (MRV, Re-Certification’; ‘Subsection 8.3 -Long-term sequestration, Permanence, and Risk Management’)

5.1 Methodology Approval Process

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

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

Yes

<https://oncra.org/guidelines/>

Oncra has a strict process for developing and updating quantification methodologies. This process is fully detailed in Guidelines Section 3.2 'Procedures for creating and updating framework documents'. All updates are monitored and supervised by the Oncra Management Team, who are advised by the Technical Committee (Section 2.3) to safeguard technical integrity and methodological robustness. The procedure explicitly mandates expert review, a minimum 30-day public consultation period, and strict version control for any new Methods or Protocols before adoption.

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

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

Yes

<https://oncra.org/guidelines/>

The Oncra framework comprehensively addresses all of these essential components:

1. Eligibility criteria: detailed in Section 4.2 ('Eligibility, Quantification and Pre-Validation').
2. Accounting boundary: mandated in Section 8.1 ('Quantification: ISO Norms and Empirical Crediting'), which requires an LCA system diagram including clear "system boundaries."
3. Additionality: addressed in Section 8.2 ('Additionality and Leakage') and operationalized via the Annex 11 Assessment Questionnaire.
4. Baseline scenario & quantification: Both are addressed in Section 8.1 ('Quantification: ISO Norms and Empirical Crediting'). This specifies that "baseline removals, project emissions and expected leakage are subtracted, to arrive at a Net Carbon Removal Benefit (NCRB)." Section 4.2 further mandates baseline measurements.
5. Quantification of GHG emission reductions or removals: Addressed in Section 8.1 ('Quantification: ISO Norms and Empirical Crediting') and Section 4.2. The ONCRA framework quantifies net climate benefit through the calculation of Net Carbon Removal Benefit (NCRB), which accounts for baseline removals, project emissions, and leakage. While ONCRA emphasizes carbon storage in nature-based systems, this approach is consistent with quantification of GHG removals, with emissions also accounted for through life cycle assessment (LCA).
6. Monitoring Practices: Strictly governed by Section 4.5 ('Monitoring, Reporting and Verification').

Additionally, removal method specific information is accounted for in the protocols: <https://oncra.org/protocols/>. The guidelines include the general Oncra information applicable to all projects.

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

Yes

<https://oncra.org/guidelines/>

Oncra has a rigorous process for developing and updating quantification methodologies, as detailed in Guidelines Section 3.2 'Procedures for creating and updating framework documents'. All updates are monitored and supervised by the Oncra Management Team, who are formally advised by the Technical Committee (Section 2.3) to safeguard technical integrity and methodological robustness. The procedure explicitly mandates expert review, a minimum 30-day public consultation period, and strict version control for any new Methods or Protocols prior to approval.

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

Yes

<https://oncra.org/guidelines/>

Section 3.2 of the Oncra Guidelines requires the Management Team to reassess Methods and Protocols where evidence suggests removals could be overestimated or additionality may no longer be ensured, and provides that Protocols found no longer fit for purpose must be suspended or, if not improvable, withdrawn. Section 8.2.6 further requires ongoing additionality reassessment at verification events where conditions materially change.

5.2 Requirements for Quantifying GHG Emission Reductions or Removals - CORSIA

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

Yes

<https://oncra.org/guidelines/>

All Protocols must contain baseline analysis provisions. For instance the Construction Stored Carbon protocol has these in 2.1.2 Carbon removals under the baseline scenario. As the Protocols contain these provisions, and a Protocol has to be used to certify a project, these procedures are in place.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 4: Certification Procedure, Section 4.2 'Eligibility, Quantification and Pre-Validation'; & Construction Stored Carbon Protocol: <https://oncra.org/protocols/csc-protocols/>)

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

Yes

<https://oncra.org/guidelines/>

Project details in the Registry have to mention all details from the project design documentation, which has to be based on above mentioned Protocols, ensuring public disclosure of baseline analyses.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 9: Open data and information disclosure, Section 9.1 'Open data principle')

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

Yes

<https://oncra.org/guidelines/>

Baseline calculations have to follow the same guideline as set out for removal quantification in Section 4.2, which states that all calculations have to be done using conservative input values and methods.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 4: Certification Procedure, Section 4.2 'Eligibility, Quantification and Pre-Validation') The Oncra Protocols give more specific information per carbon removal method: <https://oncra.org/protocols/>

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

Yes

<https://oncra.org/guidelines/>

Validation requirements prescribe that Verifiers (Certification Bodies) have to assess based on the Oncra program requirements (Guidelines Annex 7). As determining baselines is part of the Protocols, this ensures baseline reassessment has to take place at each monitoring interval.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Annex 7 'Requirements for Certification Bodies', Section 7.4 'Validation and Verification Processes')

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

Yes

<https://oncra.org/guidelines/>

Oncra addresses emissions leakage in Section 8.2.7 "Leakage Assessment" of the Guidelines. Oncra treats leakage as a project-specific risk rather than one automatically assigned to an entire sector. The program supports four sink areas, Land Stored Carbon, Ocean Stored Carbon, Rock Stored Carbon, and Construction Stored Carbon, and leakage must be assessed wherever expected by the project developer, the Scheme or the Certification Body. Activity types expressly referenced in the Guidelines that may require leakage assessment include distributed technologies such as enhanced rock weathering and discrete facilities such as farms and product processing plants. Where leakage risk is identified, projects must quantify and mitigate it and include it in net removal calculations.

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

Yes

<https://oncra.org/guidelines/>

Oncra addresses this in Section 8.2.7 "Leakage Assessment" and Annex 11 "Additionality and Leakage Assessment Questionnaire" of the Guidelines. Leakage must be assessed where this is expected by the project developer, the Scheme, or the Certification Body. Where positive evidence of leakage emerges, the project must identify potential leakage pathways, quantify expected leakage using conservative assumptions, establish mitigation measures, and account for leakage in net removal calculations. Annex 11 further operationalises this through specific leakage assessment questions on identification, quantification, monitoring, mitigation, and inclusion in project calculations.

Material leakage also has to be assessed as part of project validation, as prescribed by the respective Protocols. As a result, the Certification Body has to assess material leakage risks

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

Yes

<https://oncra.org/guidelines/>

Oncra addresses this in Section 8.2.7 "Leakage Assessment", Section 4.5 "Monitoring, Reporting and Verification (MRV, Re-Certification)", and Annex 11 "Additionality and Leakage Assessment Questionnaire" of the Guidelines.

Where leakage risk is identified, projects must establish mitigation measures to minimize leakage risks and must account for leakage in net removal calculations. Annex 11 further requires projects to document leakage mitigation strategies, monitoring systems to detect leakage, and the effectiveness of those mitigation measures. In addition, under Section 4.5, the independent Certification Body reassesses project performance during verification as part of the MRV cycle, which provides an additional control point for reviewing whether relevant risks and project impacts, including leakage where applicable, are being properly monitored and managed.

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

Yes

<https://oncra.org/guidelines/>

Oncra addresses this in Section 8.2.7 “Leakage Assessment”, Section 4.5 “Monitoring, Reporting and Verification (MRV, Re-Certification)”, and Annex 11 “Additionality and Leakage Assessment Questionnaire” of the Guidelines. Section 8.2.7 requires projects, where leakage risk is identified, to establish mitigation measures and account for leakage in net removal calculations. Annex 11 goes further by explicitly requiring projects to establish monitoring systems to detect and measure actual leakage and to establish monitoring protocols for leakage detection. In addition, Section 4.5 provides that projects undergo verification through the MRV cycle by an independent Certification Body, which serves as an additional control point for reviewing whether relevant project impacts and risks, including leakage where applicable, are being properly monitored.

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

Yes

<https://oncra.org/guidelines/>

Oncra addresses this in Section 8.1 “Quantification: ISO Norms and Empirical Crediting”, Section 8.2.7 “Leakage Assessment”, Section 4.5 “Monitoring, Reporting and Verification (MRV, Re-Certification)”, and Annex 11 “Additionality and Leakage Assessment Questionnaire” of the Guidelines. Section 8.1 states that each quantification metric must subtract baseline removals, project emissions and expected leakage to arrive at the Net Carbon Removal Benefit (NCRB). Section 8.2.7 further requires projects, where leakage is identified, to account for leakage in net removal calculations. Annex 11 operationalises this by requiring projects to demonstrate that $\text{Project Removals} - \text{Baseline Removals} - \text{Project Emissions} - \text{Leakage} \geq 0$ and to confirm that leakage has been included in net removal calculations. In addition, under Section 4.5, projects are subject to verification through the MRV cycle by an independent Certification Body, providing an additional control point to review whether relevant project impacts and calculations, including leakage where applicable, are being properly monitored and reflected.

5.2 Requirements for Quantifying GHG Emission Reductions or Removals

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

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

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

Yes

<https://oncra.org/guidelines/>

A Carbon Removal Unit under Oncra is defined as "the actual sequestration of one metric ton of CO₂ from the atmosphere or oceans." (Guidelines, Glossary, CRUs)

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

Yes

<https://oncra.org/guidelines/>

Yes. Section 4.2.2 of the Guidelines requires disclosure of full life cycle analysed operational impacts, including

other greenhouse gases and the Global Warming Potential values used, which must be conservatively chosen. This information is part of the project documentation and is covered by the scheme's disclosure provisions.

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

Yes

<https://oncra.org/guidelines/>

The length of crediting periods equals the monitoring intervals and activity periods. These intervals are prescribed by the Protocols and specified per project and recorded in the Certificate of Compliance. See Section 4.4 Certification (Validation) and Annex 7.4.3 Intervals: 'Validation of the project plan is required... at specified monitoring intervals for the issuance of units.' Additionally, crediting periods are reflected in the Registry records (Annex 6, 6.1) "Project start date and duration of the verification of the project (dates defining crediting periods)".

For Land Stored Carbon projects the crediting period is dependent on the activity type, for example, arable farming on mineral soils has an activity period of 5 years, that is renewable up to three times, thereby having a total length of combined crediting periods of 20 years. See the protocols for further specifications per activity type for the crediting periods.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 4: Certification Procedure, Section 4.4 'Certification (Validation)'; Annex 7, Sub-Section 7.4.3 'Intervals'; & Annex 6: 'Registry procedures and requirements', Section 6.1: '6.1 Onboarding of Remover and Project:')

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

Yes

<https://oncra.org/guidelines/>

Guidance on crediting period renewal is addressed in the Guidelines and the applicable Land, Ocean, Rock, or Construction Stored Carbon Protocol. Section 4.2.2 provides that each project follows the applicable Protocol, including its sector-specific MRV guidance and data requirements. Section 7.4.3 requires validation once per project duration period and verification at specified monitoring intervals. Annex 8.1 requires repetition of the additionality assessment at each crediting period renewal, and Section 8.2.6 requires reassessment where changed conditions show that the original baseline-related conditions, barriers, or parameters may no longer apply.

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

Yes

<https://oncra.org/guidelines/>

Oncra addresses uncertainty assessment in Section 4.2.2 "Oncra Project Assessment, Quantification and Pre-Validation", Section 8.1 "Quantification: ISO Norms and Empirical Crediting", and the applicable Land, Ocean, Rock, or Construction Stored Carbon Protocol. Section 4.2.2 requires uncertainty in measurements to be specified where greater than 10%, by reference to certified reports from laboratories or measurement equipment manufacturers. The same section requires conservative calculation approaches and conservative input data, and requires use of full life cycle assessment principles. Section 8.1 further states that quantification must follow ISO-based methods and conservative approaches. Together, these provisions require the activity proponent to assess uncertainty across relevant inputs, assumptions, models, parameters, and measurements in accordance with the applicable methodology and quantification rules.

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

Yes

<https://oncra.org/guidelines/>

Conservative choice of both input data and calculation methods is strictly prescribed for all quantification processes. Section 4.2.2 ('Project Assessment, Quantification and Pre-Validation') systematically establishes this by explicitly stating that "overruling any other prescriptions, all calculations have to be carried out in a conservative way by using both conservative input data and conservative calculation approaches." This ensures that whenever there is uncertainty in lifecycle assessments or baseline models, the methodology systematically errs on the side of underestimating the net carbon removal benefit rather than overestimating it. Furthermore, the project holding buffer also ensures that the quantification remains conservative (Section 5.6 Buffer pools).

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 4: Certification Procedure, Section 4.2.2 'Oncra Project Assessment, Quantification and Pre-Validation', Section 5.6: 'Buffer pools')

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

Yes

<https://oncra.org/guidelines/>

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.

Existing government policies and legal requirements must be strictly included when determining baselines and assessing additionality. As codified in the Guidelines, Section 8.2.2 ('Regulatory Additionality Assessment'), projects must prove their activities "exceed legal requirements and are not mandated by existing regulations... substantially exceed minimum compliance standards." Furthermore, Annex 3 ('Policy developments influencing soil carbon permanence and project baselines') provides an explicit framework for how sweeping policies—such as the Paris Agreement, the Common Agricultural Policy, and Nitrates Directives—must be directly factored into baseline calculations to ensure projects remain viable and additional against evolving legal minimums.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 8, Section 8.2.2 'Regulatory Additionality Assessment'; & Annex 3 'Policy developments influencing soil carbon permanence and project baselines')

5.3 Ex-Post Determination of Emission Reductions or Removals

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

Yes

<https://oncra.org/guidelines/>

Oncra in principle only issues ex-post Removal Units. Units for carbon removal that has not yet taken place in physical reality are very clearly denominated as 'Potential'. Only ex-post, verified Units are issued as 'Delivered' Units and may be used to claim carbon removal against the buyers' emissions, as reflected in Section 5.3 Registry Status Indications and 5.4 Purchase agreements for transition finance.

6.1 No Double Issuance (Double Registration)

a) Confirm your organisation has provisions in place to:

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

Yes

<https://oncra.org/guidelines/>

Participation in other programs is ruled out in The Guidelines, Chapter 4, Sub-Section 4.1.1 Eligibility. Removers (Operators) have to sign a contract with Oncra "declaring conformation to the Eligibility criteria and refraining from participation in other certification programs." (Sub-Section 4.1.2 Quantify). As also mentioned in subsection 8.1 "removers formally sign that they will not introduce their project to other carbon certification bodies beyond Oncra." Thus it is forbidden to register the same carbon storage of a project with other programs. A due diligence on public sources will be carried out if any doubt arises, either with Oncra or the Certification Body.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 4: Certification Procedure, Sub-Section 4.1.1 Eligibility, Sub-Section 4.1.2 'Quantify', Sub-section 8.1 Quantification: ISO Norms and Empirical Crediting)

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

Yes

<https://oncra.org/guidelines/>

In addition to the previous answer, the Certification Body (VVB) will assess if the project has been registered with another certification program as part of its project assessment (validation/certification) before issuing the validation statement.

Evidence: (<https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Annex 8 'Checklist for CBs to validate CCP compliance', Section 8.3 'No Double Counting')

6.2 No Double Use

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

Yes

<https://oncra.org/guidelines/>

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.

Once a Unit has been purchased, it is registered in the name of the buyer and the Unit is considered to be retired. Should the buyer only want to retire this removal in the future, then these purchases will be treated as a broker purchase, and only when notified by the purchaser for the retirement of the certificate will this certificate be issued and retired. Certificates are issued in the name of the buyer, and are unique. This prevents certificates to be transferred and double used. The registry is publicly available, allowing for transparency of the ownership of the certificates. The Registry has been coded in such a way that Units, once cancelled or retired, can no longer change status or ownership (Annex 6. Registry procedures and requirements).

To systematically prevent double-use or further transfers, Oncra employs strict registry provisions (Annex 6):

1. Simultaneous Issuance & Retirement: For direct sales, the issuance and retirement of the unit occur simultaneously (Section 6.2).
2. Unique Identifiers: Each certificate, transaction, and project is assigned a unique identifier and vintage to mathematically prevent duplication (Section 6.2 and 6.4).
3. Strict Access Controls: The Registry is secured through role-based access controls and 2FA. Public users have view-only permissions, and once a unit's status is changed to "retired" by an admin, the system logic prevents any further status or ownership changes (Section 6.4 and 6.5).

Evidence: Guidelines Annex 6: 'Registry procedures and requirements', Sections 6.2, 6.4, and 6.5)

C - Sustainable Development

7.1 Assessment and Management of Environmental and Social Risks - CORSIA

CORSIA requirements related to Safeguards System and Sustainable Development criteria

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

- environmental risks
- social risks

Yes

<https://oncra.org/guidelines/>

Social and environmental risks are mitigated through a three-tier approach. First, projects are assessed against the Doughnut Economics Framework, which requires that they do no significant harm across defined planetary boundary and social foundation indicators and, where concerns exist, provide evidence and mitigation measures proportionate to the identified risks. Second, stakeholders are informed and consulted through a structured consultation process, with grievances documented and followed up through the programme's consultation and grievance procedures. Third, where minimum standards are not met or concerns are not effectively addressed, Units may be put on hold, rendered void, or replaced from the applicable holding pool.

Additionally, Oncra adheres to a published ESG policy that addresses the internal organisation and supported programs (Guidelines Section 8.2: "An ESG policy is in place to ensure Oncra operates along best practices for Environmental, Social and Governance. The ESG Policy is published at <https://oncra.org/about-us/esg/>.)

Evidence: Guidelines Chapter 8: Sub-section 8.4: 'Sustainability – Doughnut Economics Framework' and Sub-section 8.5: 'Stakeholder information and consultation requirements'; Annex 13: 'Doughnut Assessment Questionnaire'

2) Confirm that your program uses sustainable development criteria

Yes

<https://oncra.org/guidelines/>

Sustainable development criteria are built into the programme through the Doughnut Economics Framework, which assesses projects against planetary boundary and social foundation indicators derived from scientifically grounded frameworks and the United Nations Sustainable Development Goals. Projects must demonstrate that they do no significant harm and, where relevant, maintain or improve conditions across these indicators.

Evidence: Guidelines Chapter 8: Requirements for projects: QUALITY Criteria, Section 8.4 'Sustainability - Doughnut Economics Framework'; Annex 13: 'Doughnut Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

At each verification interval, projects are reassessed through the MRV process, including against the programme's social and environmental criteria. Each MRV protocol requires assessment of social and environmental indicators following the Doughnut framework, and where significant negative impacts or other irregularities are identified, Units may be given Concern status, rendered Void, or cancelled in line with the programme's MRV and registry procedures.

Evidence: Guidelines Chapter 4: Certification Procedure, Section 4.5: 'Monitoring, Reporting and Verification (MRV, Re-Certification)'; Chapter 8: Requirements for projects: QUALITY Criteria, Section 8.4 'Sustainability - Doughnut Economics Framework'

7.1 Assessment and Management of Environmental and Social Risks

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

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

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

Yes

<https://oncra.org/guidelines/>

All mitigation activity proponents are subject to an upfront eligibility check before they can proceed under the programme. As part of this check, Operators and their Projects must demonstrate compliance with applicable national and local laws, objectives, programs and regulations, and must also respect local communities, cultural heritage and indigenous peoples. Where relevant, they must additionally comply with applicable international conventions and agreements, including human rights and anti-corruption instruments. These requirements form part of the programme's entry conditions, and projects that do not meet them are not eligible to proceed to the next steps of certification.

Evidence: Guidelines Chapter 4: '4.2.1 Eligibility check'

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

Yes

<https://oncra.org/guidelines/>

Negative environmental and social impacts are assessed using the Oncra Doughnut Economics Framework, which evaluates each project against defined planetary boundary and social foundation indicators and applies a Do No Significant Harm standard. The assessment is carried out in a manner proportional to project scope and scale through interviews, document assessment, and a standardized Doughnut Assessment Questionnaire, with immediate remediation required where criteria are not met.

Evidence: Guidelines Chapter 8: 'Sustainability – Doughnut Economics Framework'; Annex 13: 'Doughnut Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

The programme requires stakeholder consultations to be carried out as part of project design in an inclusive, culturally appropriate, and accessible manner, with communications in local languages or with translation where necessary and with respect for local knowledge. Consultations are obligatory for projects in developing countries and may also be required in developed countries where issues such as benefit sharing, Indigenous rights, or social equity arise. Where vulnerable communities are involved, FPIC principles must be followed, and Enhanced Track projects involving Indigenous Peoples or sensitive ecosystems are subject to additional safeguards, longer consultation timelines, and specific FPIC protocols. Stakeholder input must be documented, project responses recorded, and feedback incorporated or explicitly addressed in project documentation. Evidence: Guidelines Chapter 8: 'Stakeholder information and consultation requirements'

b) Where, pursuant to 7.1 a) 2), the mitigation activity proponents have assessed that the mitigation activity poses risks of negative environmental and/or social impacts with regard to any of criteria 7.2 - 7.8 (inclusive) confirm your organisation requires the mitigation activity proponents to:

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

Yes

<https://oncra.org/guidelines/>

The programme requires proponents to include mitigation measures, proportionate to the identified risks, in validated design documents prior to registration where negative environmental or social impacts are suspected. This requirement is applied through the Doughnut Economics Framework, under which operators must demonstrate that projects do no significant harm and, where concerns arise, provide evidence and risk-based mitigation measures before registration.

Evidence: Guidelines Chapter 8: 'Sustainability - Doughnut Economics Framework'

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

Yes

<https://oncra.org/guidelines/>

The programme requires that measures taken to address identified social and environmental concerns are carried forward into the monitoring and verification cycle. Addressed grievances must be reflected in the published project documentation and re-assessed in the first following verification period, while each MRV protocol also requires assessment of social and environmental indicators under the Doughnut framework.

Evidence: Guidelines Chapter 8: 'Stakeholder information and consultation requirements', Chapter 4: 'Monitoring, Reporting and Verification (MRV, Re-Certification)'

7.2 Labour Rights and Working Conditions

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

1) provides safe and healthy working conditions for employees.

Yes

<https://oncra.org/guidelines/>

Safe and healthy working conditions are required through the programme's Doughnut Economics Framework, which includes social foundation criteria on both Income and Work and Health. Projects must demonstrate that they do no significant harm across these indicators, and the standardized Doughnut Assessment requires evidence on health and safety measures, accident records, and health protection arrangements as part of project assessment and verification.

Evidence: Guidelines Chapter 8: 'Sustainability - Doughnut Economics Framework'; Annex 13: 'Doughnut Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

Fair treatment, non-discrimination, and equal opportunities are required through the programme's Doughnut Economics Framework, which includes social foundation criteria on Social Equity and Gender Equality. Projects must demonstrate that they do no significant harm across these indicators, and the standardized Doughnut Assessment requires evidence on inclusive participation, equitable benefit distribution, women's participation, equal opportunity policies, and gender-sensitive approaches as part of project assessment and verification.

Evidence: Guidelines Chapter 8: 'Sustainability - Doughnut Economics Framework'; Annex 13: 'Doughnut Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

The programme addresses protection against forced labour, child labour, trafficking, and related labour rights risks through its Doughnut Economics Framework and eligibility requirements. Projects must demonstrate that

they do no significant harm across relevant social foundation indicators, including Income and Work and Social Equity, while the framework also links these requirements to labour rights and working conditions and to internationally agreed human rights standards. These requirements apply to project activities and associated implementation arrangements and are assessed as part of project review and verification.

Evidence: Guidelines Chapter 8: 'Sustainability - Doughnut Economics Framework'; Chapter 4: '4.2.1 Eligibility check'; Annex 13: 'Doughnut Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

The programme requires proponents to confirm adherence to the relevant safeguards through the validated project documentation and the Doughnut Assessment. Projects are assessed against the Doughnut Economics Framework as part of the design and validation process, and Certification Bodies must validate that a project meets all rules and requirements of the Oncra programme before it can proceed. Where risks or concerns are identified, the operator must include proportionate mitigation measures in validated design documents prior to registration.

Evidence: Guidelines Chapter 8: 'Sustainability - Doughnut Economics Framework'; Annex 13: 'Doughnut Assessment Questionnaire'; Annex 7: '7.4.1 Validation')

7.3 Resource Efficiency and Pollution Prevention

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

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

Yes

<https://oncra.org/guidelines/>

The programme requires mitigation activities to minimise pollutant emissions to air, pollutant discharges to water, and the generation and release of hazardous materials, including chemical pesticides and fertilisers, through the Doughnut Economics Framework and its Do No Significant Harm requirement. Projects are assessed by Certification Bodies against the relevant planetary boundary indicators, including Air Pollution, Water Pollution, and Chemical Pollution, and the standardized Doughnut Assessment requires evidence on air quality controls, water pollution prevention, waste management, and chemical management protocols when applicable.

Evidence: Guidelines Chapter 8: 'Sustainability - Doughnut Economics Framework'; Annex 13: 'Doughnut Assessment Questionnaire'

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

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

Yes

<https://oncra.org/guidelines/>

The programme requires proponents to identify whether the mitigation activity results in pollutant emissions to air, pollutant discharges to water, noise and vibration, the generation of waste, or the release of hazardous materials, chemical pesticides and fertilisers, through the Doughnut Economics Framework and the supporting

Doughnut Assessment. Where negative environmental effects are suspected, proponents must include measures, commensurate with the identified risks, to minimise and address those impacts in validated design documents prior to registration.

Evidence: Guidelines Chapter 8: 'Sustainability – Doughnut Economics Framework'; Annex 13: 'Doughnut Assessment Questionnaire'

7.4 Land Acquisition and Involuntary Resettlement

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

Yes

<https://oncra.org/guidelines/>

The programme requires mitigation activities to avoid, or where this is not feasible, minimise forced physical and/or economic displacement through its Doughnut Economics Framework and Do No Significant Harm requirement. The framework explicitly links the Social Foundation indicators to minimum standards on land acquisition and involuntary resettlement, and requires projects to demonstrate that they do not make physical reality worse than the baseline situation on these parameters. Where risks or negative social effects are identified, operators must include measures, commensurate with the identified risks, to minimise and address those impacts in validated design documents prior to registration.

Evidence: Guidelines Chapter 8: 'Sustainability – Doughnut Economics Framework'

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

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

Yes

<https://oncra.org/guidelines/>

The programme requires proponents to identify and address risks of forced physical and/or economic displacement through the Doughnut Economics Framework and the validated design documentation. The framework links the relevant social safeguards to minimum standards on land acquisition and involuntary resettlement, and where negative social effects are suspected, operators must include measures, commensurate with the identified risks, to minimise and address those impacts in validated design documents prior to registration.

Evidence: Guidelines Chapter 8: 'Sustainability – Doughnut Economics Framework'

7.5 Biodiversity Conservation

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

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

Yes

<https://oncra.org/guidelines/>

The programme requires mitigation activities to avoid, or where this is not feasible, minimise negative impacts on terrestrial and marine biodiversity and ecosystems through the Doughnut Economics Framework and its biodiversity-specific safeguards. Projects must demonstrate that they do no significant harm across the relevant planetary boundary indicators, and the biodiversity requirements explicitly require projects to avoid or minimise negative impacts on terrestrial and marine biodiversity and ecosystems, protect habitats of rare, threatened and endangered species, and prevent conversion of natural forests, grasslands, wetlands, or high conservation value habitats.

Evidence: Guidelines Chapter 8: 'Sustainability – Doughnut Economics Framework'; <https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 8: '8.4.2 Biodiversity as the basis for life'

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

Yes

<https://oncra.org/guidelines/>

The programme requires mitigation activities to protect the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity, through its biodiversity safeguards. Projects must avoid or minimise biodiversity harm, protect sensitive habitats, and preserve areas needed for ecological connectivity as part of the validated project design and assessment process. For projects in Europe, applicable EU habitat legislation provides an additional layer of protection alongside the programme requirements.

Evidence: Guidelines Chapter 8: '8.4.2 Biodiversity as the basis for life'

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

Yes

<https://oncra.org/guidelines/>

The programme requires that mitigation activities do not convert natural forests, grasslands, wetlands, or high conservation value habitats. This is addressed both through the eligibility criteria, which require operators to demonstrate that they do not convert natural ecosystems such as natural forests or wetlands, especially those with conservation status, and through the biodiversity safeguards, which require projects to prevent the conversion of natural forests, grasslands, wetlands, or high conservation value habitats. The programme also operationalises this through the standardized Doughnut Assessment Questionnaire, which requires evidence on land use change, conservation status, and habitat protection.

Evidence: Guidelines Chapter 4: '4.2.1 Eligibility check', Chapter 8: '8.4.2 Biodiversity as the basis for life', Annex 13: 'Doughnut Assessment Questionnaire')

4) minimises soil degradation and soil erosion.

Yes

<https://oncra.org/guidelines/>

The programme requires mitigation activities to minimise soil degradation and soil erosion through its biodiversity and land-related safeguards under the Doughnut Economics Framework. These requirements are stated explicitly in the biodiversity safeguards, which require projects to minimise soil degradation and erosion, and are further operationalised through the standardized Doughnut Assessment Questionnaire, which requires evidence on soil quality, erosion control measures, erosion rates, soil organic carbon content, and sustainable land management practices.

Evidence: Guidelines Chapter 8: '8.4.2 Biodiversity as the basis for life', Annex 13: 'Doughnut Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

The programme requires mitigation activities to minimise water consumption and stress through its biodiversity and sustainability safeguards. This is stated explicitly in the biodiversity requirements, which require projects to reduce water consumption and stress associated with the mitigation activity, and is further operationalised through the Doughnut Assessment Questionnaire.

Evidence: Guidelines Chapter 8: '8.4.2 Biodiversity as the basis for life', Annex 13: 'Doughnut Assessment Questionnaire'

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

1. whether the mitigation activity has negative impacts on terrestrial and marine biodiversity and ecosystems, on habitats of rare, threatened, and endangered species, on soil degradation and soil erosion, and on water consumption and water stress.
2. where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in 7.1 b) 1).

Yes

<https://oncra.org/guidelines/>

In addition to the previous answer, if risks to these pollution occur, measures for mitigation will have to be developed and described in the validated design documents (project plans). Guidelines Section 8.4.1 states: "If negative environmental or social effects are suspected by either the Operator, the Certification Body or Oncra, the Operator must 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."

Evidence: Guidelines Chapter 8: Requirements for projects: QUALITY Criteria, Section 8.4.1 'Doughnut indicators'

7.6 Indigenous Peoples, Local Communities and Cultural Heritage

a) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, confirm your organisation requires mitigation activity proponents to ensure that the mitigation activity:

- 1) recognises, respects and promotes the protection of the rights of IPs & LCs in line with applicable international human rights law, and the [United Nations Declaration on the Rights of Indigenous Peoples](#) and ILO Convention 169 on Indigenous and Tribal Peoples.

Yes

<https://oncra.org/guidelines/>

Yes. Under the Oncra Doughnut Economics Framework, projects must comply with the Do No Significant Harm principle and may not worsen baseline conditions across the social foundation indicators, including social equity. The Guidelines explicitly state that the framework covers minimum standards for land acquisition and involuntary resettlement, and where negative social effects are suspected, the Operator must include proportionate mitigation measures in validated design documents prior to registration. This means projects must avoid, or where unavoidable minimise, forced physical and economic displacement.

Evidence: Guidelines Chapter 8: Requirements for projects: QUALITY Criteria, 'Sustainability – Doughnut Economics Framework'; & Annex 13 'Doughnut Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

The programme requires proponents to identify rights-holders who may be affected by the mitigation activity through the stakeholder consultation process. The stakeholder definition expressly includes Indigenous Peoples and Local Communities with customary rights, rights holders potentially affected by project activities, and land-rights holders within or adjacent to project boundaries. For Standard and Enhanced Track projects, operators must systematically identify and document these stakeholders using the standardized Stakeholder Consultation Form.

Evidence: Guidelines <https://oncra.org/wp-content/uploads/2026/03/Oncra-Guidelines-27-March-2026.pdf>, Chapter 8: 'Stakeholder information and consultation requirements'; Annex 12: 'Oncra Stakeholder Consultation Form'

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

Yes

<https://oncra.org/guidelines/>

The programme requires the application of FPIC principles where relevant to the circumstances. When vulnerable communities are involved, FPIC principles must be followed as part of the stakeholder consultation process, and Enhanced Track projects involving Indigenous Peoples or sensitive ecosystems are subject to additional safeguards, extended consultation timelines, and specific FPIC-related protocols.

Evidence: Guidelines Chapter 8: '8.5 Stakeholder information and consultation requirements'; Chapter 8: '8.5.1 Project Categories and Track Assignment'; Chapter 8: '8.5.4 Information Package and Consultation Process'

4) does not force eviction or any physical or economic displacement of IPs & LCs, including through access restrictions to lands, territories, or resources, unless agreed upon with IPs & LCs during the FPIC process.

Yes

<https://oncra.org/guidelines/>

The programme does not permit forced eviction or physical or economic displacement of Indigenous Peoples and Local Communities. This is addressed through the Doughnut Economics Framework, which links social safeguards to minimum standards on land acquisition and involuntary resettlement and requires that projects do no significant harm, and through the stakeholder consultation requirements, which require FPIC principles to be followed where vulnerable communities are involved and prohibit certification where cultural heritage is substantially endangered. Where negative social effects are suspected, proponents must include measures, commensurate with the identified risks, in validated design documents prior to registration.

Evidence: Guidelines Chapter 8: '8.4 Sustainability – Doughnut Economics Framework'; Chapter 8: '8.5 Stakeholder information and consultation requirements'

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

Yes

<https://oncra.org/guidelines/>

The programme requires projects to preserve and protect cultural heritage and does not allow certification where cultural heritage is substantially endangered by the project. This is addressed both through the eligibility requirements, which require operators and projects to respect cultural heritage, and through the stakeholder consultation requirements, which require cultural sensitivity and explicitly state that projects substantially endangering cultural heritage will not be certified.

Evidence: Guidelines Chapter 4: '4.2.1 Eligibility check'; Chapter 8: '8.5 Stakeholder information and consultation requirements'

b) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, confirm your organisation requires that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in 7.1 b) 1).

Yes

<https://oncra.org/guidelines/>

Where a mitigation activity directly or indirectly affects Indigenous Peoples and Local Communities, including livelihoods, ancestral knowledge, or cultural heritage, the programme requires these impacts and the corresponding safeguards to be addressed through the validated project documentation and stakeholder consultation process. Projects must respect cultural heritage, follow FPIC principles where vulnerable communities are involved, document stakeholder feedback and operator responses, and include proportionate mitigation measures in validated design documents prior to registration where negative social effects are suspected. Without these provisions, the project cannot proceed to certification.

Evidence: Guidelines Chapter 8: '8.5 Stakeholder information and consultation requirements'; Chapter 8: 'Sustainability - Doughnut Economics Framework'; Annex 12: 'Oncra Stakeholder Consultation Form'

7.7 Respect for Human Rights, Stakeholder Engagement

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

1) avoids discrimination and respects human rights.

Yes

<https://oncra.org/guidelines/>

Oncra enforces strict baseline requirements during the onboarding phase to ensure all certified activities avoid discrimination and fundamentally respect human rights. As codified in Section 4.1.1 (Eligibility), "The Operator and its Projects must abide by national and local laws, objectives, programs and regulations, respect local communities, cultural heritage and indigenous peoples, and where relevant, international conventions and agreements." If a project developer fails to meet these human rights and non-discrimination thresholds during the initial project and chain integrity assessment, the project is denied registration.

Evidence: Guidelines Chapter 4, Section 4.1.1 'Eligibility'

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

Yes

<https://oncra.org/guidelines/>

Yes, Oncra strictly mandates adherence to these fundamental universal instruments at the project level. Section 4.1.1 of the Guidelines explicitly dictates that all Operators and their Projects must abide by relevant international conventions and agreements, "including but not limited to the United Nations Convention against Corruption (UNCAC), International Bill of Human Rights, and the United Nations Declaration on the Rights of Indigenous Peoples." This eligibility criteria must be formally confirmed via contract before any carbon removal activity can proceed to certification.

Evidence: Guidelines Chapter 4, Section 4.1.1 'Eligibility'

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

Yes

<https://oncra.org/guidelines/>

Oncra mandates a structured, transparent, and accessible consultation process to ensure local stakeholders' views are actively taken into account and responded to (Section 8.5). Before project commencement, developers must conduct consultations using local languages and culturally appropriate methods. Stakeholders must be provided with an unedited platform (such as surveys or structured meetings) to freely express their views. Furthermore, Oncra requires developers to implement a formal grievance system: any grievances or feedback must be acknowledged and reported to Oncra within 14 days, and resolved or escalated within one month. The specific outcomes of addressed grievances must be explicitly documented in the published project documentation and are subject to mandatory reassessment during the next verification period. Failure to comply with these responsiveness standards results in project rejection.

Evidence: Guidelines Chapter 8, Section 8.5 'Stakeholder information and consultation requirements'

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

Yes

<https://oncra.org/guidelines/>

Yes, design documents need to reflect confirmation and when doubt arises with either the Developer, the CB or Oncra, mitigation measures have to be strictly in place. Section 8.4 mandates: "the Operator must 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."

Evidence: Guidelines Chapter 8: Requirements for projects: QUALITY Criteria, Section 8.4.1 'Doughnut indicators'

7.8 Gender Equality

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

- 1. provides for equal opportunities in the context of gender**
- 2. protects against and appropriately responds to violence against women and girls**
- 3. provides equal pay for equal work**

Yes

URL:

<https://oncra.org/guidelines/>

The same mechanisms as explained under 7.1 - 7.7 apply; gender equality is specifically addressed and enforced through Social Foundation number 7 (Gender Equality) within the Doughnut Assessment Framework (Section 8.4).

Evidence: Guidelines Chapter 8, Section 8.4 'Sustainability - Doughnut Economics Framework'; & Annex 13 'Doughnut Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

The exact same strict mechanisms apply for mitigation measures. If negative environmental or social effects regarding gender equity are suspected, the Operator must include measures in validated design documents prior to registration, as mandated in Section 8.4.1.

Evidence: Guidelines Chapter 8: Requirements for projects: QUALITY Criteria, Section 8.4.1 'Doughnut indicators'

7.9 Robust Benefit-Sharing

a) If your organisation requires arrangements for benefit-sharing with IPs & LCs, confirm that you require that mitigation activity proponents:

- 1) include in validated design documents information on how benefit-sharing arrangements that are appropriate to the context and consistent with applicable national rules and regulations will be designed and implemented through a benefit-sharing plan.**

Yes

<https://oncra.org/guidelines/>

The same mechanisms as explained under 7.1 - 7.8 apply. Benefit-sharing is specifically enforced through Social Foundation numbers 1 (Income and Work) and 6 (Social equity) within the Doughnut Assessment Framework (Section 8.4). This ensures that appropriate economic opportunities are retained and shared with local communities.

Evidence: Guidelines Chapter 8, Section 8.4 'Sustainability - Doughnut Economics Framework'; & Annex 13 'Doughnut Assessment Questionnaire'

2) confirm in validated design documents that the draft and final benefit-sharing plan have been shared with the affected IPs & LCs in a form, manner, and language understandable to them.

Yes

<https://oncra.org/guidelines/>

Provisions related to community impact and benefit-sharing must be shared following the procedures for Stakeholder Consultation. Section 8.5 mandates that a transparent consultation process must occur, explicitly addressing local community relations and potential benefit-sharing or conflict resolution provisions. Draft plans must be discussed, and a finalised plan must be published as part of the validated project documentation in the

Registry.

Evidence: Guidelines Chapter 8, Section 8.5 'Stakeholder information and consultation requirements'; & Annex 12 'Stakeholder Consultation Form'

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

Yes

<https://oncra.org/guidelines/>

As both project design documents ('Project Details' in the Registry) and verification documents must be publicly shared, also benefit-sharing outcomes will have to be published at monitoring intervals.

Evidence: Guidelines Chapter 9: Open data and information disclosure, Section 9.1 'Open data principle'

7.10 Cancun Safeguards

a) Confirm your organisation requires for all REDD+ mitigation activities that the mitigation activity is consistent with all relevant Cancun Safeguards as set out in paragraph 71 of [decision 1/CP.16 of the United Nations Framework Convention on Climate Change](#).

No

N/A

This does not apply because Oncra does not certify REDD+ activities.

7.11 Ensuring Positive SDG Impacts

a) Confirm your organisation requires that mitigation activity proponents, in validated design documents:

1) provide information on how the mitigation activity is consistent with the SDG objectives of the host country, where the SDG objectives are relevant, and such is feasible.

Yes

<https://oncra.org/guidelines/>

The activity must be consistent with the SDG objectives of the host country, as Oncra uses Social Foundations defined by SDG indicators, as set out in Section 8.4. Non-social SDGs are largely addressed by the Planetary Boundaries in the Doughnut framework. Following the Do No Net Harm principles, SDGs will likely be improved and at least be kept constant, making the Oncra Framework inherently consistent with relevant SDGs.

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

Yes

<https://oncra.org/guidelines/>

Oncra enforces a comprehensive qualitative assessment of SDG impacts through its mandatory Doughnut Economics Framework (Section 8.4). During the design phase, projects must be evaluated against twelve Social Foundation indicators—which are directly derived from the United Nations' Sustainable Development Goals (SDGs). These indicators cover essential minimum standards for human well-being, including health, education, gender equality, and labour rights. Project Developers are required to systematically assess their activities against the specific SDG targets adopted by the host country to demonstrate how the project contributes positive, measurable social impacts alongside its carbon removals.

Evidence: Guidelines Chapter 8, Section 8.4 'Sustainability - Doughnut Economics Framework'

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

Yes

<https://climatecleanup.org/donometer/>

As the SDG framework was developed for country-level assessment, standardised tools for qualitative project-level assessment are rare. Previously, the Oncra team developed a prototype for a 'Donometer', a tool that assesses both planetary boundaries and SDG-based social foundations. This tool however is still under development.

D – CORSIA Requirements Related to ICVCM Category Assessment

8. Additionality Demonstration – CORSIA

1) **Confirm that your Program’s carbon credits represent greenhouse gas emissions reductions or carbon sequestration or removals that exceed any greenhouse gas reduction or removals required by law, regulation, or legally binding mandate.**

Yes

<https://oncra.org/guidelines/>

The Onkra Guidelines Section 8.2 (Additionality and Leakage) establishes a strict Four-Pillar additionality framework. Pillar 2 (Regulatory Additionality Assessment) strictly mandates that "Projects must demonstrate that carbon removal activities exceed legal requirements and are not mandated by existing regulations. The assessment criteria prescribe that no existing laws, regulations, or policies require the specific project activities."

Evidence: Guidelines Chapter 8, Section 8.2.2 'Regulatory Additionality Assessment'; & Annex 11 'Additionality and Leakage Assessment Questionnaire'

2) **Confirm that your Program’s carbon credits exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative, business-as-usual scenario.**

Yes

<https://oncra.org/guidelines/>

The Onkra Guidelines strictly enforce this via Pillar 1 (Financial Additionality Testing) in Section 8.2.1, which dictates: "Projects must demonstrate that carbon removal activities would not be pursued for financial reasons without carbon credit revenues." This relies on robust baseline scenario analyses to prove that credits exceed what would occur under business-as-usual conditions.

Evidence: Guidelines Chapter 8, Section 8.2.1 'Financial Additionality Testing'; & Annex 11 'Additionality and Leakage Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

Yes, additionality and baseline-setting are rigorously assessed by Certification Bodies (VVBs). Section 8.2 mandates that "All Onkra projects must... demonstrate additionality through a comprehensive four-pillar assessment framework." To operationalize this, Certification Bodies are strictly required to use the detailed evaluation templates provided in Annex 11 (Additionality and Leakage Assessment Questionnaire) during both initial validation and subsequent verification assessments.

Evidence: Guidelines Chapter 8, Section 8.2 'Additionality and Leakage'; & Annex 11 'Additionality and Leakage Assessment Questionnaire'

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

Yes

<https://oncra.org/guidelines/>

Projects are systematically reviewed for additionality and baseline-setting under rules of Section 8.2. Furthermore, Protocols are periodically re-assessed by the Onkra Management Team (Section 3.2), "particularly on aspects that could lead to removals being overestimated or additionality that might not be ensured because of technical or socio-economic advancements or other reasons."

In addition, Onkra advises sales-prices for Units that are high enough to cover the removal costs, however the means of enforcing minimal market prices seem to be minimal. Onkra advises the CRCF team as well as the ICVCM to consider mechanisms for minimum prices in removal credit market rules, because with low unit prices additionality is absent and all crediting efforts are lost.

Evidence: Guidelines Chapter 3, Section 3.2; & Chapter 8, Section 8.2

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

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

<https://oncra.org/guidelines/>

Oncra's comprehensive "Four-Pillar Assessment Framework" (Guidelines Section 8.2) utilizes almost all of these methods simultaneously to ensure additionality.

Investment/Cost & Barrier Analysis: Used in Pillar 1: Financial Additionality Testing, requiring a Simple Cost Analysis, Investment Analysis (IRR), or specific Barrier Analysis (Section 8.2.1).

Legal or regulatory additionality analysis: Used in Pillar 2: Regulatory Additionality Assessment, requiring proof that activities exceed legal requirements and minimum compliance standards (Section 8.2.2).

Common practice / market penetration analysis: Used in Pillar 3: Common Practice Analysis, establishing strict market penetration thresholds (<25%) and Common Practice Factor calculations (Section 8.2.3).

Other: Used in Pillar 4: Environmental Additionality (explained in the next question). Evidence: Guidelines

Chapter 8, Section 8.2 'Additionality and Leakage'

6) If your program provides for the use of method(s) not listed above, please describe the alternative procedures and how you ensure that mitigation activities are additional:

No

N/A

Under the "Other" category, Oncra enforces a fourth, non-standard metric: Pillar 4: Environmental Additionality. As codified in Section 8.2.4 of the Guidelines, projects must physically demonstrate net carbon sequestration after strictly accounting for all project emissions, expected leakage, and baseline removals. Because Oncra exclusively certifies Nature-based carbon removal, proving physical net-removal mathematically acts as the ultimate baseline safety net, ensuring the activity represents a genuine climate impact beyond the business-as-usual scenario.

Evidence: Guidelines Chapter 8, Section 8.2.4 'Environmental Additionality'

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

Yes

<https://oncra.org/guidelines/>

Oncra does not use a blanket "positive list." However, Section 8.2.3 (Common Practice Analysis) explicitly dictates that highly innovative or nascent technologies below Technology Readiness Level (TRL) 8-9 may demonstrate common practice additionality without detailed market penetration analysis, subject to justification in the Project Design Document.

Evidence: Guidelines Chapter 8, Section 8.2.3 'Common Practice Analysis'

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?

Yes

<https://oncra.org/guidelines/>

For activities exempt from detailed common practice analysis (such as nascent technologies below TRL 8-9), Operators must still provide explicit justification in their Project Design Document. Furthermore, all Operators must still pass Pillar 2 (Regulatory Additionality), and legally declare under Section 4.1.1 (Eligibility) that they do not "have the opportunity to make use of government subsidies or grants specifically aimed at the mitigation activity."

Evidence: Guidelines Chapter 4, Section 4.1.1 'Eligibility'; & Chapter 8, Sub-Section 8.2.3

9) Confirm how the procedures described under the above criteria related to additionality provide a reasonable assurance that the mitigation activities would not have occurred in the absence of the carbon crediting program:

Yes

<https://oncra.org/guidelines/>

As detailed in Section 8.2.5, additionality testing is subjected to a rigorous, multi-step process including Preliminary Assessment via the Annex 11 questionnaire, Documentation Review, Independent Verification by certified third-party auditors, Expert Review by the Technical Advisory Panel (for complex cases), and Public Consultation for large projects. This provides strict, structural assurance that projects would not occur without the crediting program.

Evidence: Guidelines Chapter 8, Section 8.2.5 'Additionality Testing Procedures'

9. Permanence – CORSIA

1) List all emissions sectors (if possible, activity types) supported by your program that present a potential risk of reversal of emissions reductions, avoidance, or carbon sequestration:

Yes

<https://oncra.org/guidelines/>

Risk of reversal is present for A) biobased construction materials, B) carbon farming, C) ocean-based sequestration.

Evidence: Guidelines Annex 14: Risk Assessment Scorecard, Section D 'Permanence & Reversal Risks'

2) Confirm what the minimum scale of reversal (i.e. threshold of materiality) is for which your program provisions or measures require a response. (Quantify if possible)

Yes

<https://oncra.org/guidelines/>

The minimum scale of reversal that requires a response is 5% of the credited carbon removal. Any reversal below this threshold is considered within normal variation. Reversals above 5% trigger the compensation mechanisms described in the Guidelines (Section 8.3 and Section 5.6 Buffer Pools) "If deviations more than 5% are determined in verification events, the deviation has to be assessed".

Evidence: Chapter 8, Section 8.3 'Long-term sequestration, Permanence, and Risk Management'

3) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to undertake a risk assessment that accounts for, inter alia, any potential causes, relative scale, and relative likelihood of reversals.

Yes

<https://oncra.org/guidelines/>

Risk assessments are required for all project types with reversal risks. For biobased construction materials, this includes assessing fire and decay risks. For carbon farming, risks like drought, fire, and land use changes are evaluated. For ocean sequestration, potential upwelling or acidification risks are analyzed. The Guidelines (Section 5.6) require Operators to conduct and document these risk assessments prior to certification.

Evidence: Chapter 5, Section 5.6; & Annex 14 'Risk Assessment Scorecard'

4) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to monitor identified risks of reversals.

Yes

<https://oncra.org/guidelines/>

Ongoing monitoring of reversal risks is mandated in the project-specific Monitoring, Reporting and Verification (MRV) protocols. For example, soil carbon projects must conduct regular soil sampling, while construction projects require periodic inspections of cadaster data and the physical structures (buildings). The frequency and methods are specified in each Protocol.

Evidence: Chapter 4, Section 4.5 'Monitoring, Reporting and Verification'

5) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to mitigate identified risks of reversals?

Yes

<https://oncra.org/guidelines/>

Risk mitigation measures are strictly required based on the identified risks. As stated in Section 8.3, deviations and reversal risks must be strictly assessed in verification events, and Operator mitigation measures and holding pool procedures are enforced accordingly.

Evidence: Chapter 8, Section 8.3 'Long-term sequestration, Permanence, and Risk Management'

6) For those sectors/activity types identified in CORSIA requirement 9.1 in this section, confirm that procedures and measures are in place to require and support these activities to ensure full compensation for material reversals of mitigation issued as emissions units and used toward offsetting obligations under the CORSIA?

Yes

<https://oncra.org/guidelines/>

Full compensation for material reversals is ensured through buffer pools. As detailed in Guidelines Section 5.6, a percentage of credits from each project is placed in a buffer pool. If reversals occur, credits from this pool are used for compensation. For large-scale reversals, additional measures are required as detailed in the last paragraph of Section 5.6.

Evidence: Guidelines Chapter 5, Section 5.6 'Buffer Pools'

7) Confirm that provisions are in place that confer liability on the activity proponent to monitor, mitigate, and respond to reversals in a manner mandated in the program procedures?

Yes

<https://oncra.org/guidelines/>

The Guidelines (Section 5.6) clearly state that Operators are liable for monitoring, mitigating, and responding to reversals throughout the project crediting period. This liability is also included in the contractual agreements with Operators ("Operators are liable for reversal risk up to this point.").

Evidence: Guidelines Chapter 5, Section 5.6 'Buffer Pools'

8) Confirm that provisions are in place that require activity proponents, upon being made aware of a material reversal event, to notify the program within a specified number of days.

Yes

<https://oncra.org/guidelines/>

Operators are required to notify Oncra within 20 business days of becoming aware of a material reversal event (Section 8.3: "Operators are obliged to report reversal events within 20 business days."), and the obligation to

provide information on reversal is specified in the information requirement in Section 4.5.

Evidence: Guidelines Chapter 8, Section 8.3 'Long-term sequestration, Permanence, and Risk Management'

9) Confirm that provisions are in place that confer responsibility to the program to, upon such notification, ensure and confirm that such material reversals are fully compensated in a manner mandated in the program procedures.

Yes

<https://oncra.org/guidelines/>

Upon notification of a material reversal, Oncra is responsible for ensuring compensation occurs, as outlined in Guidelines Section 5.6. This involves retiring the appropriate number of Units from the buffer pool, other projects from the same Operator or otherwise, as detailed in Section 5.6.

Evidence: Guidelines Chapter 5, Section 5.6 'Buffer Pools'

12. Sustainable Development Benefits And Safeguards – CORSIA

1) Confirm that your program has procedures in place to ensure that mitigation activities do not violate local, state/provincial, national or international regulations or obligations.

Yes

<https://oncra.org/guidelines/>

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.

Two procedures are in place. First, projects are assessed as part of the Eligibility test (Section 4.1.1). Second, Certification Bodies ('VVBs') have to analyse projects on possible violations and report on these, as they have to assess against the regulations set out in the Oncra Guidelines (Section 4.1.1, Annex 7).

Evidence: Guidelines Chapter 4, Section 4.1.1 'Eligibility'; & Annex 7 'Requirements for Certification Bodies'

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

Yes

<https://oncra.org/guidelines/>

Social and Economic safeguards are detailed in Section 8.4, which explains the Planetary Boundaries and Social Foundation indicators that the Project must be assessed against, following Certification Body ('VVB') procedures outlined in Annex 7. In addition, Oncra operates along strictly enforced ESG Policies published at its website, and is legally guided by Dutch law as Climate Cleanup, the Foundation that operates Oncra, is registered as a public benefit organisation (ANBI), which legally necessitates compliance with social and environmental standards.

Evidence: Guidelines Chapter 8, Section 8.4 'Sustainability - Doughnut Economics Framework'; & Annex 13 'Doughnut Assessment Questionnaire')

3) Confirm that your program publicly discloses the institutions, processes, and procedures that are used to implement, monitor and enforce safeguards to identify, assess and manage environmental and social risks.

Yes

<https://oncra.org/guidelines/>

Oncra lists its ESG Policies on its website, its Environmental and Social assessment framework in its Guidelines (Section 8.4), and the institutions that assess projects against the assessment framework as Certification Bodies ('VVBs') also on its website and as authors to the Verification Reports.

End Copy of Application