

Field #	Data field	Details	Data format	Data source/Supporting notes
	Consolidated identifying information for cancelled emissions units (continued)	5.e Eligible Emissions Unit Programme	Text entry	ICAO document <i>CORSIA Eligible Emissions Units</i> that is available on the ICAO CORSIA website
		5.f Unit type	Text entry  Enter only the acronym for the unit  In cases where a unit has also been certified under an additional non-carbon programme (i.e., a co-benefit programme), only the unit type as used under the CORSIA Eligible Emissions Unit Programme should be entered, with no further acronyms or characters	Emissions unit programme registry cancellation data  <i>Note.— Unit type refers to the name and/or associated acronym used to describe a unit issued under a given CORSIA Eligible Emissions Unit Programme, i.e. “Certified Emission Reduction”, or “CER” is the “unit type” issued under the UNFCCC Clean Development Mechanism (CDM)</i>
		5.g Host country	Text entry	Emissions unit programme registry cancellation data  This is the host country in which the programme activity occurred or is taking place
		5.h Methodology	Alphanumeric  In case of more than one methodology, enter title and associated reference (where applicable) of each methodology	Emissions unit programme registry cancellation data  A “methodology” may also be described as a “protocol” or “framework”. The aeroplane operator should fill out the applicable term as used by the emissions unit programme
		5.i Demonstration of unit date eligibility	Alphanumeric	Parameters of unit date eligibility as contained in the ICAO document entitled <i>CORSIA Eligible Emissions Units</i> available on the ICAO CORSIA website

Field #	Data field	Details	Data format	Data source/Supporting notes
	Consolidated identifying information for cancelled emissions units (continued)	5.j Programme-designated registry name	Text entry	ICAO document <i>CORSIA Eligible Emissions Units</i> available on the ICAO CORSIA website  CORSIA Eligible Emissions Unit Programme registry
		5.k Unique identifier for registry account to which the batch was cancelled	Alphanumeric	Emissions unit programme registry cancellation data  This should be the account in which the cancelled units are recorded
		5.l Aeroplane operator in whose name the unit was cancelled	Alphanumeric	Emissions unit programme registry cancellation data  It should be in the name of the reporting aeroplane operator and match the entry publicly visible on the emissions unit programme registry public website
		5.m The unique identifier for the registry account from which the cancellation was initiated	Alphanumeric	Emissions unit programme registry cancellation data

### 3.3.6.2 Preparing information for the verification process of the EUCR

This section includes guidance for an aeroplane operator to successfully secure and prepare the information required for the verification process. The verification process itself is based on objectives (a) to (c), as contained in Annex 16, Volume IV, Appendix 6, 3.2.2. This section sets out guidance, for each of these three objectives, on what information should be collected and for what purpose.

**Objective (a):** *The aeroplane operator has accurately reported cancellations of its CORSIA Eligible Emissions Units in accordance with Annex 16, Volume IV.*

In order to accurately complete the required fields in an EUCR, the aeroplane operator should take all appropriate steps including through contractual arrangement(s), as necessary to ensure the following:

- a) The required quantity of CORSIA Eligible Emissions Units are cancelled in the name of the aeroplane operator on a given programme registry, within the timeframe required;

- b) The aeroplane operator has access to all the required information to complete the EUCR in a timely manner, in particular in cases where a third party has been engaged to cancel units on its behalf;
- c) The aeroplane operator has confirmed that the programme registries which it is utilizing can make public the required fields from Annex 16, Volume IV, Appendix 5, Table A5-7 for its cancelled units, and that it has acquired the rights necessary to instruct (directly or indirectly) the publication of cancelled emissions units on a programme registry website, in the timeframe required; and
- d) The aeroplane operator can, if requested, provide a verification body with access to the programme registry account in cases where a quantity of emissions units have been cancelled, for the purposes of completing the verification of an EUCR.

In order to ensure accuracy and avoid data entry errors between information as contained in an emissions unit programme registry and an EUCR, where available the aeroplane operator may wish to download cancellation reports from the given programme registry and cross-check data entered in an EUCR against the registry report.

In order to ensure that the aeroplane operator's reported emissions units are cancelled in accordance with the requirements in Annex 16, Volume IV and can be clearly explained to the verification body, the operator should take the following actions:

- a) Identify within all the relevant programme registries to be used, the available options for cancellation of an emissions unit, along with associated terminology and definitions. Such information will be available from the emissions unit programme and/or programme registry;
- b) Make use of the cancellation step offered by the programme registry consistent with the note under Annex 16, Volume IV, Part II, Chapter 4, 4.2.2 b) ("Cancel" means the permanent removal and single use of a CORSIA Eligible Emissions Unit within a CORSIA Eligible Emissions Unit Programme designated registry such that the same emissions unit may not be used more than once. This is sometimes also referred to as "retirement", "cancelled", "cancelling" or "cancellation"); and
- c) Keep track of the steps used for each programme registry, with associated terminology and make available to the verification body during the verification process.

*Note 1.— A programme registry cancellation report, where available, may not include all the required fields of information under an EUCR and therefore the operator may need access to information held within a registry account.*

*Note 2.— A programme registry cancellation report cannot be used in lieu of a consolidated Emissions Unit Cancellation Report.*

**Objective (b):** *The stated number of cancelled CORSIA Eligible Emissions Units is sufficient for meeting the aeroplane operator's total final offsetting requirements associated with the relevant compliance period, after accounting for any claimed emissions reductions from the use of CORSIA eligible fuels, and the aeroplane operator can demonstrate sole right of use to such cancelled CORSIA Eligible Emissions Units.*

The first part of this objective addresses a material requirement specific to each aeroplane operator of cancelling a required quantity of emissions units, as indicated to it by a State. The information used by a verification body to corroborate and verify whether this objective has been met is as contained in Fields 3, 4 and 5 of the EUCR. The total quantity of cancelled CORSIA Eligible Emissions Units in Field 4 should therefore be equal to the sum of all the batches of cancelled units in Field 5.

The second part of this objective seeks to ensure and protect against a scenario in which the legal rights of use to a cancelled emissions unit contained in an EUCR, beneficial or otherwise, reside with a third party other than the reporting aeroplane operator. The aeroplane operator may use the following sources of data to demonstrate “sole rights of use”:

- a) Contractual evidence of acquisition/transfer of title and ownership to the emissions unit;
- b) Contractual evidence of instructions to a third party to cancel emissions units on an aeroplane operator’s behalf;
- c) Terms and conditions pertaining to sole rights of use/cancellation, if applicable, between the aeroplane operator and a CORSIA Eligible Emissions Unit Programme registry, where reported units have been cancelled; and
- d) Emissions unit programme registry public website, containing corroborating cancellation information, including Field 5.I, “Aeroplane operator in whose name the unit was cancelled”.

*Objective (c): The CORSIA Eligible Emissions Units cancelled by the aeroplane operator to meet its offsetting requirements under Annex 16, Volume IV have not been used by the aeroplane operator to offset any other emissions.*

This objective seeks to ensure and protect against a scenario in which the same emissions unit has been used (intentionally or not) by the aeroplane operator towards another requirement, which may be regulatory or voluntary in nature.

- a) Regulatory schemes:

The aeroplane operator should identify whether it is participating in (or expects to be shortly participating in) another mandatory scheme which requires the cancellation of emissions units, eligible under both CORSIA and any such other requirements. In the case where the operator is required to physically “surrender” or “transfer” the eligible emissions unit to a regulatory body, the risk of double use is mitigated, as an emissions unit cannot be both transferred and reported as cancelled for the purposes of CORSIA in a programme registry. In the case where an operator is participating in a regulatory scheme other than CORSIA, where (i) the same emissions units are eligible (as under CORSIA) and (ii) such other scheme does not require physical transfer of a unit, the risk of reporting the same cancelled unit exists. Therefore, the operator should in such instance prepare the following information to be reviewed by a verification body:

- 1) All relevant rules and participation information of any other such regulatory scheme(s), including emissions units eligibility information, compliance and reporting requirements and timelines;
- 2) All internal control and risk management procedures utilized to mitigate such risks, including any applicable audit documentation; and
- 3) Cancellation information of emissions units under such programme, including audit reports where applicable, for the current relevant reporting cycle. This information should be in an electronic format and made available for the verification body to conduct a comparison between unique identifiers (serial numbers).

## b) Non-regulatory/voluntary schemes:

In cases where an aeroplane operator has been, or is currently participating in, or is operating a non-regulatory (voluntary) scheme, where emissions units used are also eligible for use under CORSIA, then a risk exists of intentional or unintentional dual use. An example of such a scheme is when an aeroplane operator is offsetting its own emissions, operating a consumer opt-in/opt-out programme. Therefore, the operator should in such instance prepare the following information to be reviewed by a verification body:

- 1) All internal information regarding such schemes, including past specific emissions units, as well as retirement/cancellation information of emissions units made in a period starting from three calendar years prior to the start of the reported CORSIA compliance cycle. This information should be in an electronic format and made available for the verification body to conduct a comparison between unique identifiers (serial numbers);
- 2) All internal control and risk management procedures utilized to mitigate such risks, including any applicable audit documentation; and
- 3) Public reporting materials, such as Corporate Social Responsibility (CSR) reports and marketing materials, or submissions made under voluntary reporting initiatives/certification schemes such as, for example, the Carbon Disclosure Project (CDP).

## 3.3.6.3 Voluntary pre-verification by the aeroplane operator

In order to prepare for third-party external verification, aeroplane operators should consider conducting a voluntary internal pre-verification. Similar to the Emissions Report, it is recommended to appoint an internal auditor. The main objective of the audit is to ensure that all relevant data is available for the verification body and is also presented in a way which allows for an effective but also efficient audit. In addition to the list included in Table 3-13, the aeroplane operator is encouraged to develop its own internal cross-checks. These could, for instance, include approaches to compare the key steps in the process for internal commissioning of purchasing emissions units, with the units being held in a registry to ensure eligibility, or a general analysis to determine whether there are other internal processes (e.g., within subsidiaries), which use offsetting as well to meet legal or voluntary requirements.

**Table 3-13. Voluntary pre-verification checklist**

<i>Completed by</i>	<i>Topic</i>	<i>Task</i>	<i>Satisfactorily completed: Yes/No/ Not completed/ Not applicable</i>
<b>Aeroplane operator CORSIA management team</b>	<b>Selecting internal auditor</b>	Has a qualified internal auditor or audit team been chosen?	
		Is it ensured that the internal auditor has the required knowledge and skills and is independent from the activity being audited?	

<i>Completed by</i>	<i>Topic</i>	<i>Task</i>	<i>Satisfactorily completed: Yes/No/ Not completed/ Not applicable</i>
<b>Internal auditor</b>	<b>Understand aeroplane operator emissions unit cancellation process</b>	Review aeroplane operator's plan to conduct cancellations and other relevant internal procedures for conducting cancellations and collating information (data flow charts, preliminary draft reports, historical reports, communications with State, etc.)	
<b>Internal auditor in conjunction with aeroplane operator's CORSIA management team</b>	<b>Identify scope of voluntary pre- verification audit plan</b>	What is the applicable reporting cycle for cancellations?	
		Identify the applicable emissions unit registries where reported units have been cancelled, including whether the account is owned by the operator or by a third party	
		Check whether the aeroplane operator is participating in any other regulatory schemes where the same emissions units are applicable and where the schemes do not require transfer/surrender of emissions units	
		Check whether the operator has participated in/conducted voluntary offset schemes, up to three years prior to the start of the current compliance period	
<b>Internal auditor</b>	<b>Evaluate staff competence</b>	Check whether the responsible staff is competent and has been trained sufficiently	
<b>Internal auditor</b>	<b>Analysis to identify errors or gaps in the report</b>	Are all the required fields in Annex 16, Volume IV, Appendix 5, Table A5-7 complete and equal to the cancellation information as contained within all applicable third-party registries?	
		Does the total quantity of cancelled CORSIA Eligible Emissions Units in Field 5.a of Annex 16, Volume IV, Appendix 5, Table A5-7 match the operator's required quantity for the given cycle?	

<i>Completed by</i>	<i>Topic</i>	<i>Task</i>	<i>Satisfactorily completed: Yes/No/ Not completed/ Not applicable</i>
		Are all reported emissions unit cancellations visible on a publicly accessible website of the applicable emissions unit programme registry?	
		Does the aeroplane operator have documented evidence of sole right of use of the reported emissions units?	
<b>Internal auditor</b>	<b>Assess scope and any applicable exemptions</b>	Does the aeroplane operator participate under another regulatory scheme, with the same eligibility/reporting requirements?  Does the aeroplane operator operate/engage in a non-regulatory/voluntary offsetting scheme?	
<b>Internal auditor</b>	<b>Data sources used</b>	List all applicable data sources used to compile report and applicable supporting information required to complete the verification	

#### 3.3.6.4 Verification steps

Given the general provisions in the CORSIA relevant to ISO GHG standards (cf. reference) and the additional requirements in Annex 16, Volume IV, Appendix 6, this section provides guidance on the CORSIA-specific verification characteristics.

##### (1) Pre-contract stage

It is recommended that the contractual terms of engagement between the aeroplane operator and the verification body specify the conditions for verification by stating the type of report being verified (in this case the EUCR) and points a) to g) under Annex 16, Volume IV, Appendix 6, 2.12.

According to Annex 16, Volume IV, Appendix 1, aeroplane operators are required to send a verified EUCR to the State by 30 April 2025 for the first time after the initial compliance period (2021-2023). The verification of this first EUCR is likely to take place between 1 December 2024 and 30 April 2025. During part of this period, the verification of the Emissions Report for the year 2024 will take place. An aeroplane operator will therefore have to decide to either contract one verification body to perform the verification of the Emissions Report and EUCR, or choose separate verification bodies to verify the reports. When deciding on the approach, it is important to recall Annex 16, Volume IV, Appendix 6, 2.2.1, whereby the leader of the verification team can only undertake six annual verifications for one aeroplane operator (including any other GHG verifications outside CORSIA).

For example:

- An aeroplane operator has sourced five verifications of the Emissions Report already (2019-2023);
- In order to reduce costs for on-site visit, the aeroplane operator aims to purchase the verification of the EUCR and the verification of the Emissions Report from the same verification body;
- The verification body used so far has just one single lead verifier employed (verifying EUCR and Emissions Report).

Option A: The aeroplane operator contracts the existing verification body for the emissions reporting year 2024 (Emissions Report) and EUCR (2021-2023) (sixth annual verification). For the following year, the aeroplane operator must either request that the existing verification body identify a new team lead, or contract a new verification body.

Option B: The aeroplane operator contracts a new verification body for the emissions reporting year 2024 (Emissions Report) and for the first verification of the EUCR (2021-2023).

Whichever approach the aeroplane operator decides on, it is recommended that the aeroplane operator and the verification body agree on the contractual matters at the latest by October of the year preceding the one for which the verification will be carried out. It is recommended that aeroplane operators engage/contract a verification body as soon as possible after their first cancellations of emissions units. This is particularly advisable for aeroplane operators that cancel emissions units prior to knowing their final offsetting obligation. The required timeline for submission of a verified EUCR is in Annex 16, Volume IV, Appendix 1 for each period. Aeroplane operators will only know their exact final offsetting obligation on 30 November following the end of each period, or later if there is a delay in publication of the sector growth factor. While verifications cannot be completed until this information is known, an aeroplane operator may wish to undertake preparatory activities for the verification, such as preparing material required for the verification of the EUCR.

For each verification engagement, the verification body must ensure that a competent and impartial verification team and independent reviewer are appointed prior to signing a legally enforceable agreement with the aeroplane operator. The specific competencies required for a verification team, including knowledge requirements, technical expertise, and data and information auditing expertise are provided in the following documents:

- a) ISO 14065:2013, entitled *Greenhouse gases — Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition*;
- b) ISO 14066:2011, entitled *Greenhouse gases — Competence requirements for greenhouse gas validation team and verification teams*; and
- c) Annex 16, Volume IV, Appendix 6.

Verification bodies are to ensure that, as a minimum, the verification team includes a team leader, as defined in ISO 14066:2011, who leads the engagement planning and management of the verification team. While it is possible that a single individual, or team leader, may fulfil all the competence requirements for a verification team, ISO 14065 requires that someone not directly involved with the verification activities confirm that all verification activities have been completed and determine whether the EUCR is free from material discrepancies. The internal reviewer is typically appointed at the same time as the verification team members, and must have competencies equivalent to a team leader. All verification team members must be identified in the Verification Report.



In order to perform all verification activities appropriately, the verification body requires access to all relevant documents including access to potential registries accounts of the aeroplane operator. The identification of all relevant data sources should be done in advance. Access should also be granted to premises and staff of the aeroplane operator (e.g., for interviews), if this is needed to conduct the verification in an appropriate manner.

### *(2) Strategic analysis*

It is recommended that the verification body conduct the strategic analysis<sup>7</sup> by January of the year when the verification of the EUCR takes place. In addition to the programme-neutral content of the strategic analysis, the parts specific to the EUCR should at least include the following items:

- a) administrative and organizational aspects (e.g., size of the aeroplane operator, organizational structure, key commercial data such as growing or shrinking business, web page information, annual report);
- b) general quantity of the emissions units to purchase and offset (small, medium, or large);
- c) previous versions of EUCR and Verification Report; and
- d) relevant communication between aeroplane operator and State.

If the verification body has not achieved a sufficient level of understanding to assess the scope and complexity of the verification, it will not be possible to perform a risk analysis, determine if a modification to the verification team is required or assess whether the contractually agreed time allocation for this specific verification engagement is indeed sufficient.

### *(3) Risk analysis*

It is recommended that the verification body conduct the analysis of risks<sup>8</sup> by January of the year when the verification of the EUCR takes place (directly after the strategic analysis). In addition to the programme-neutral content of the risk analysis, it should at least include the following items:

- a) number of batches of cancelled emissions units;
- b) cancellation status, as advised by the aeroplane operator, and whether the aeroplane operator is self-reporting any timeline challenges to acquire and cancel the required quantity of eligible units in time for the verification;
- c) number of different emissions unit programme registries involved and proportion of direct versus indirect control of registry accounts, where operator cancellations have taken place;
- d) operator participation in other regulatory/non-regulatory programmes;

7. Definitions of strategic analysis are contained in the IAF Mandatory Document for the Application of ISO 14065:2013, Issue 2 (IAF MD 6:2014).

8. Definitions of the assessment of risks are contained in the IAF Mandatory Document for the Application of ISO 14065:2013, Issue 2 (IAF MD 6:2014).

- e) assessment of whether the CORSIA offsetting process is part of a certified management system;
- f) availability of internal audit reports;
- g) type and level of detail of described internal procedures applicable to ensure that the number of cancelled CORSIA Eligible Emissions Units is sufficient for meeting the aeroplane operator's final offsetting requirements;
- h) type and level of detail of described internal procedures applicable to ensure the eligibility of emissions units cancelled to meet the offsetting obligation under CORSIA;
- i) multiple locations for data gathering and processing;
- j) centralized vs. decentralized responsibilities for CORSIA; and
- k) voluntary pre-verification documentation.

Verification bodies are encouraged to check the results and documentation of the voluntary pre-verification in detail. Depending on the documentation, results of the pre-verification might significantly reduce the verification risk. On the basis of the risk analysis, verification bodies should identify and quantify inherent and control risks. As with other GHG schemes, the risk analysis is subject to revision should the verification reveal that the risk is actually much higher or lower than originally assessed. This has an influence on the verification plan as well.

#### *(4) Verification plan*

It is recommended that the verification body draft the verification plan by January of the year when the verification of the EUCR takes place (directly after the risk analysis). The following elements should be covered:

- a) verification programme (including name of aeroplane operator, verification objective, verification scope, verification language, arrangements and responsibilities within the verification team, site visit arrangements, potential technical details to access registries, activities performed on- and off-site, document list); and
- b) test plan for control activities (scope and methods of testing, including IT controls, quality assurance in outsourced processes, procedures to ensure eligibility of units and sufficient number of emissions units).

In cases where additional risks are identified or new information that changes the original assessment of a risk is discovered during the actual verification, the associated risk analysis and verification plan must be updated.

Site visits are an essential part of the verification activities under the CORSIA, whereas the term “site” refers to the place where the aeroplane operator performs the main activities of data processing to calculate the final figures of the EUCR (in most cases the headquarters of the aeroplane operator). Site visits are recommended for verification bodies verifying an EUCR of an aeroplane operator, especially if the EUCR is being verified for the first time. To a large extent, the risk analysis, but also the evidence obtained during the verification itself, determine the scope and the number of site visits necessary for a verification body to conclude on the EUCR. During the visit, the verification body is, for instance, able to obtain physical evidence of the systems in place, can interview staff of the aeroplane operator, and check the practical application of control procedures.