



**GLOBAL
CARBON
COUNCIL**

Driving Climate Actions

Clarification No. 01

V1.3 – 2022

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1. Introduction

1. The GCC Program Framework¹ in section 14 provides the information on 'GCC Documentation Framework', which defines various types of GCC documents including the 'Information Documents'. The 'Information Documents' has further been classified into a sub-type of regulatory document called as 'Clarifications', which provides clarifications on unclear GCC requirements or introduce new requirements.

2. Scope

2. This document consolidates several queries and feedback provided by stakeholders and provides clarifications to existing GCC requirements and introduce new requirements, and as a consequence leads to the amendments in respective GCC documents which have been adopted by the GCC Steering Committee.
3. This document provides Clarifications and introduces new requirements on the following:
 - (a) **Specific design requirements for a single Project having multiple bundles/sub-bundles** (new requirement): Allows a single project to have multiple bundles/sub-bundles, covering multiple technologies or measures, and be submitted as a single project under type A1 or A2 (new requirement).
 - (b) **Consolidates and includes all CORSIA requirements at registration and issuance stage**: Consolidates all requirements for projects, at registration and issuance stage, that wish to label their approved carbon credits issued by GCC Program with CORSIA label (C+) (refer to Project Standard, v 4.1, paragraphs 14 (c)(v); 15).
 - (c) **GCC Project Types and clarifying various sub-types of A2 projects**: Allows projects, which have started commercial operations after 1 January 2016, to be submitted to GCC Program as Type A2 project, requiring compliance of all the requirements and applying full process of the project cycle. The following types of projects have been allowed:
 - (i) Allows projects to migrate from both compliance and voluntary programs², with scope covering both GHG as well as non-GHG, to be submitted to GCC Program as Type A2 project only (new requirement);
 - (ii) Allows CDM excluded CPAs, which have been included in CDM registered PoAs after 1 Jan 2016, to be submitted as a A2 type project (new requirement);

¹ GCC documents are available here: www.globalcarboncouncil.com/resource-centre.html

² For example: This may include both compliance and voluntary programs, which can cover both GHG as well as non-GHG. For example: (a) compliance project-based GHG Programs can include German Emission Trading Authority (DEHSt), Chinese carbon reduction standard (CCER); (b) voluntary GHG Programs can include Verra/VCS, Gold Standard, etc.; and (c) voluntary non-GHG Programs can include I-REC, etc.

- (iii) Enhancing flexibility of the requirements on de-registration from CDM for type B projects. The requirements on de-registration from CDM for type B projects has been made more flexible to overcome the barriers to de-register (refer to Project Standard, v 4.1, paragraphs 11 (b); and
- (iv) The deadline for the submission of A2 projects has been extended. As per the clarification, A2 type project are required to make initial submission to GCC Program, for uploading for global stakeholder consultation, prior to 5 July 2022 (new requirement).
- (d) **Avoidance of Double Accounting in regional Emission Trading Schemes:** Allows A1 or A2 type projects from the jurisdiction where Emission Trading Schemes (ETS) are in operation (e.g., European Union Emission Trading Scheme (EUETS), Chinese ETS) to be submitted as a GCC project, provided that they are not included or covered in the ETS and avoid double accounting (new requirement).
- (e) **De-bundling:** Includes criteria on de-bundling of a large project activity into smaller components (new requirement).
- (f) **Typo-error corrections:** This document clarifies that the typo error in the GCC Program Manual in paragraph 68 shall be considered as corrected to 20%, instead of 10%, to be consistent with paragraph 74 of the Project Standard.
- (g) **Physical site-visit inspection for projects with multiple sites:** Provides requirements for GCC Verifiers for conducting a physical site-visit inspection for projects with multiple sites (new requirement).

3. Entry into Force

- 4. The amendments and clarifications contained in this document shall enter into force on the day of its initial publication (22/12/2021) on the GCC website. The clarifications provided in this document shall always be read in conjunction with the GCC regulatory documents including Project Standard, Verification Standard and Project Process. The requirements contained in this document is mandatory and applicable to all projects which have not submitted request for registration to the GCC Program.
- 5. This document in itself is a transitional document and will at later point in time be reflected throughout the revised versions of regulatory documents, mainly into Project Standard, Verification Standard, Program Process and forms such as PSF, etc. This document will cease to be in force till this is approved after consolidation into the 'Project Standard' and other applicable regulatory documents in its next revision.

4. Specific design requirements for a Single Project having multiple bundles/sub-bundles

- 6. It is important for scale-up of the project-based mechanism, while optimizing transaction costs for Project Owner, that different projects should be allowed to be bundled together without compromising with the rigor that is required to assess the additionality and

emission reductions carried out by each bundle vis-à-vis entire project. There are certain requirements of bundling, which must/shall be followed by Project Owners while creating bundles of projects in the submission to GCC Program.

7. The key principle is to ensure that activities included in the bundles must be of homogeneous nature that facilitates the collective establishment of baseline, emission reductions calculation, additionality demonstration and assessment of certification labels for multiple activities in a bundle. The additionality must be assessed at the bundle or activity level. As any non-additional bundles cannot qualify to be included in the project document, the project as a whole cannot qualify to pass additionality test if any bundle fails to demonstrate additionality.
8. Broadly a bundled project has three levels: bundled project, bundles, activities. This is depicted in figure-1 below, along with example.

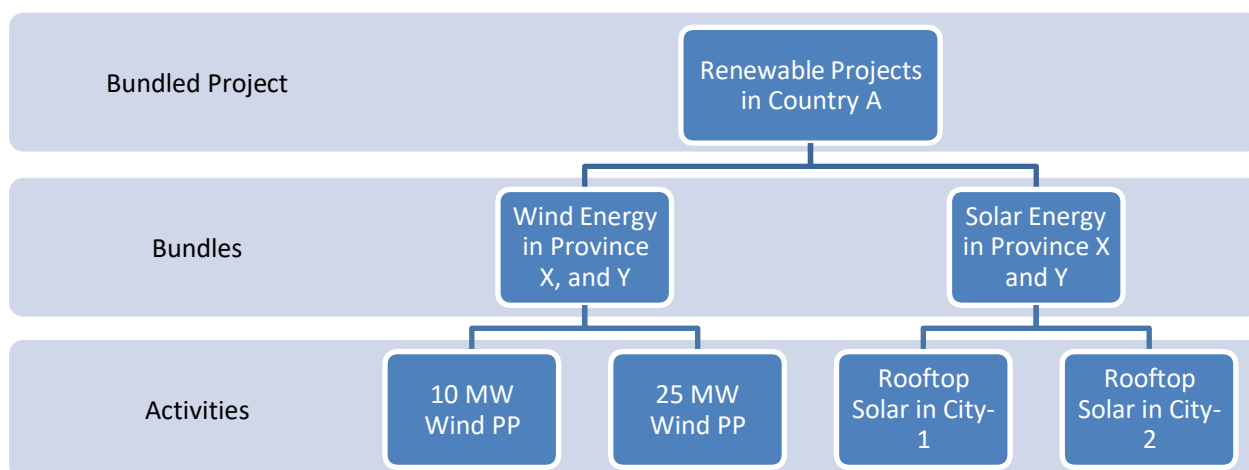


Figure-1: Levels in Bundled Projects

9. In case the activities are heterogeneous in nature and cannot be put together as homogeneous bundles as depicted above, then the activities can be clubbed and submitted as bundled project, provided the additionality and common practice analysis is demonstrated at individual activity level, as required by the applicable methodology.

Two-level analysis for formulation of homogeneous bundles

10. A single bundled project is developed by organizing several homogeneous bundles of activities put together. As depicted in figure-2 below, two-level analysis is needed for determination of homogeneous bundles for a bundled project.
11. **Level-1 analysis - Consideration of key aspects for developing Homogeneous Bundles:** A homogeneous bundle shall be formed based on the analysis of multiple activities to find out similarity in technological, economic and environmental/methodological considerations. These are explained as follows.

- (i) *Similarity in Technological Considerations:* All activities in a bundle shall apply same type of technology as allowed by the applicable methodology or combination of methodologies³, if allowed, addressing 'cross-effects' (e.g., a single project developed to include only solar PV technology and applying ACM0002 and AMS-I.D).
- (ii) *Similarity in Economic and Policy Considerations:* Activities under one bundle shall have same additionality approach (investment or barrier analysis as stipulated by the applicable methodology):

In doing this, the Project Owners shall consider every element of the project design to ensure homogeneity. For example, following elements should be considered:

- same investment analysis method (e.g. post tax project or equity IRR, or pre-tax project or equity IRR, NPV, etc.);
- comparable key input values⁴ (which constitute more than 20% of total project investment costs and total project revenues, which is applicable as per the specific project situation);
- same investment decision year;
- investment benchmark;
- Location;
- supplying electricity to the different grids/ captive purposes;
- project capacity;
- geographical location;
- project and spatial boundary;
- project investors profile;
- legal ownership of bundles;
- other elements

- (iii) *Similarity in Environmental or Methodological Considerations:* Activities in one bundle shall have:
- i. application of same methodology (or approved combinations where cross effects are addressed);
 - ii. same baseline approach and the outcome; and
 - iii. same monitoring approach and parameters for the part included for GHG.

³ If a large scale as well as small scale CDM methodology, considered for cross-effects, is applied in a bundled project, the additionality approach stipulated by the large-scale methodology will supersede.

⁴ For example, the projects of dissimilar size, these comparable values should be based on USD/MW or USD/Hectare of land.

12. **Level-2 analysis – Criteria for differentiating the bundles:** Formulate a separate bundle of activities if any of the following criteria is **not** complied with.

- (a) Same baseline of each activity within a bundle;
- (b) Same output of each activity (e.g., heat or power or cogeneration);
- (c) Same Technology of each activity (e.g., wind or solar);

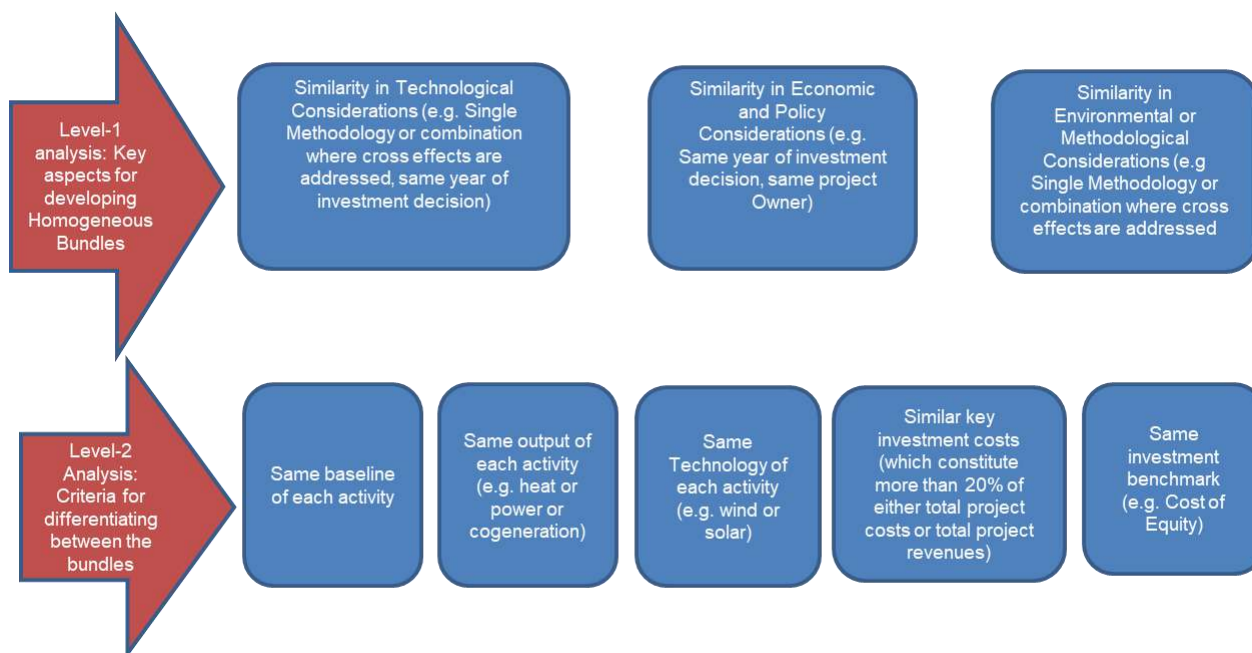


Figure-2: Two-level analysis for formulating the bundles

- (d) Same additionality approach stipulated by the applicable methodology:
 - i. If a large scale CDM/GCC as well as small scale CDM methodology, considered for cross-effects, is applied in a bundled project, the additionality approach stipulated by the large-scale methodology will supersede.
 - ii. If investment analysis is applied:
 - a. Similar key investment costs of activities (which constitute more than 20% of either total project investment costs or total project revenues, which is applicable as per the specific project situation); and
 - b. Same investment benchmark applicable for additionality analysis (e.g. Cost of Equity, weighed average cost of capital).
 - iii. If barrier analysis is used:
 - a. All the activities within the bundle should have same barrier(s).

Other requirements for Bundled Projects

13. The start date of operation of the Bundled Project shall be the earliest start date among all of the homogeneous bundles/ heterogeneous project activities. All project activities in the bundle shall have the same crediting period (i.e. same length and same start date of the crediting period).
14. Once a project activity becomes part of a bundle it shall not be de-bundled. The composition of the bundles shall not change over time (i.e., the submission of project activities to be used in a bundle shall be made at the same time. A project activity shall not be taken out of a bundle nor shall a project activity be added to the bundle after start of GSC).
15. The sum of the size (capacity for type I, energy saving for type II and direct emissions of project activity for type III) of the technology or measure utilized in the bundled project (consisting of all homogeneous bundles/ project activities) shall not exceed the limits for CDM small-scale project activities as set in paragraph 6 (c) of the decision 17/CP.7 in order for the bundled project to apply approved CDM small-scale methodology. If in a bundled project some of the bundles comply with small-scale thresholds, but others exceed the small-scale thresholds the methodological approaches for baseline setting, additionality and monitoring stipulated by the large-scale methodology will supersede.
16. Separate monitoring plans shall be defined for each bundle in a bundled project that account for:
 - (a) GHG reduction component;
 - (b) For voluntary certification labels (E+, S+). These labels for the entire bundled project shall be issued if all the bundles demonstrate no-net-harm; and
 - (c) For voluntary SDG+ certification labels. The SDG label for the entire project shall be issued corresponding to the lowest SDG label achieved among all the bundles.
17. If combination of methodologies is applied, the cross-effects between methodologies and/or technologies/measures and/or bundles within and across the bundles shall be addressed and impacts considered as per '*Guidelines for the consideration of interactive effects for the application of multiple CDM methodologies for a programme of activities (EB68, Annex 3)*'.
18. The Letter of Authorization shall be signed by each organisation and legal owner of the activities included in bundle and bundled project and shall nominate and authorize a single Project Owner (organisation to act on behalf of the all the parties/ legal owners/ Project Owners) for GCC project development (to open account in GCC Portal, for document submission, etc) and for ownership of ACCs.
19. The final decision by the GCC Steering Committee on submitted request for registration or issuance is applied at the bundled project level and not at the individual bundle level and this results into only one outcome and not multiple outcomes. For example, final decision by the GCC Steering Committee on submitted request for registration cannot be to register first bundle and reject second bundle or give one SDG+ label to first bundle and another to second bundle.

20. Common practice for the bundled project shall be defined as per the CDM Tool for Common Practice. The common practice shall be ascertained for each bundle or activity depending upon the level for which additionality is defined.
21. Some non-binding examples of bundling is provided in Information Note: Non-binding examples of bundling, which provides examples on how a single project can be bundled and designed into homogeneous categories.

5. CORSIA requirements

22. “As per ICAO’s documents on CORSIA Emissions Unit Eligibility Criteria and CORSIA Eligible Emissions Units⁵, GCC Program received Approval from ICAO Council in March 2021 and therefore, emission units are eligible for cancellation for use by International Airlines toward CORSIA offsetting requirements in the 2021 – 2023 compliance cycle.

⁵ <https://www.icao.int/environmental-protection/CORSIA/Pages/CORSIA-Emissions-Units.aspx>

5.1 CORSIA Requirements at Registration Stage

23. The Project Owners shall ensure that the Project Activity complies with all the requirements for the CORSIA Emissions Unit Eligibility Criteria as stipulated by Project Standard, in particular:
- a. The start of Project Activity operation and the start of crediting period shall be on or after 1 January 2016 and complies with all the applicable GCC rules and requirements;
 - b. The Project Activity is likely to result in GHG emission reductions as a result of implementation of the registered GCC project activity;
 - c. The Project Activity has not caused any net harm to the environment and/or society and therefore achieves Environmental No-net-harm Label (**E+**) and Social No-net-harm Label (**S+**);
 - d. The Project Activity has made contributions for achieving United Nations Sustainability Development Goals (SDGs) and has contributed to achieving at least three SDGs and therefore targets to achieve **Silver** or higher SDG certification label (**SDG+**); and
 - e. The project meets all the requirement of the CORSIA Eligible Emissions Units⁶ required for GCC projects and does not fall under the excluded unit types, methodologies, programme elements, and/or procedural classes;
24. If GCC Program receives the approval to issue CORSIA eligible units beyond 31 December 2020, the Project owner shall ensure that there is no double counting for Emission units generated after 31 December 2020:
- (i) A written attestation, expressing the intention, from the host country's national focal point or focal point designee shall be provided prior to submission of request for registration to the GCC Program; and
 - (ii) A self-declaration from the Project Owner in the PSF that written attestation from the host country's national focal point or focal point designee will be provided at the earliest opportunity, but prior to submission of requesting issuance to the GCC Program.
25. At registration stage, the GCC Project Verifier shall provide a certification opinion on whether a project is expected to achieve an indicative CORSIA (**C+ label**) only if the project activity complies with the conditions stated in paragraph 23 and 24 above and is likely to:
- a. reduce a forecasted quantity of greenhouse gases (**ACC label**);
 - b. achieve Environmental No-Net Harm (**E+ label**);
 - c. achieve Social No-Net Harm (**S+ label**); and

⁶ CORSIA Eligible Emissions Units containing approval and conditions for GCC Program:

https://www.icao.int/environmental-protection/CORSIA/Documents/TAB/ICAO%20Document%2008%20_%20CORSIA%20Eligible%20Emissions%20Units_November%202021.pdf

- d. achieve United Nations Sustainability Development Goals (**Silver** or higher **SDG+ label**).

5.2 CORSIA Requirements at Issuance Stage

26. At issuance stage, for each monitoring period, the GCC Emission Reduction Verifier shall provide a certification opinion that the project has achieved a CORSIA (**C+ label**), if the project activity complies with the conditions stated below and has:
- a. confirmed that the project has been implemented as per the registered project activity;
 - b. confirmed that the Project Activity has started its operations and the crediting period after 1 January 2016;
 - c. met all the requirement of the CORSIA Eligible Emissions Units required for GCC projects and does not fall under the excluded unit types, methodologies, programme elements, and/or procedural classes;
 - (a) reduced a given quantity of greenhouse gases (**ACC label**);
 - (b) achieved Environmental No-Net Harm (**E+ label**);
 - (c) achieved Social No-Net Harm (**S+ label**);
 - (d) achieved United Nations Sustainability Development Goals (**Silver** or higher **SDG+ label**);
 - (e) submit a written attestation from the host country's national focal point or focal point designee for eligible units generated beyond 31 December 2020.
27. If GCC Program receives the approval from ICAO to issue CORSIA eligible units beyond 31 December 2020, the Project owner shall submit a written attestation from the host country's national focal point or focal point designee that there is no double counting for Emission units generated after 31 December 2020 and shall be provided⁷ prior to submission of requesting issuance to the GCC Program.
28. The ACCs issued during period (from 1 January 2016 – 31 Dec 2020) are eligible to be used by International Airlines for offsetting their emissions during 1st phase (2021-2023) of CORSIA and eligible to be issued with CORSIA Certification label (**C+**), if the conditions stipulated in paragraph 24 and 25 above are complied.

⁷ For CORSIA certified carbon credits, a host country attestation is a requirement of ICAO/CORSIA. This letter shall preferably be provided to GCC Program at the earliest (if possible) and can also be provided later, if not available. This means that the project owner can submit this letter either at:

- (a) The initial submission for GSC: If this letter is not submitted, the project can be tagged with an indicative CORSIA flag if at least the PSF confirms to submit this letter.
- (b) Along with the submission for a request for registration (after Project Verification is completed). If this letter is not submitted, the project can be tagged with an indicative CORSIA flag if at least the PSF and Verification Report confirms to submit this letter, at first issuance.
- (c) Along with the submission for a request for the first issuance: in this case, the ACCs will not be tagged as CORSIA (C+) compliant if this letter is not submitted.

6. GCC Project Types and clarifying various sub-types of A2 projects

29. The clarification provided below for various project types eligible under GCC Program and conditions of its eligibility are given in the tables 1, 2 and 3 below.

Table 1: Project Types Eligible for Registration under the GCC Program

Project Types							
	Type A1	Type A2				Type B1	Type B2
		Sub-Type 1	Sub-Type 2	Sub-Type 3	Sub-Type 4		
Description	This type includes new futuristic projects, not submitted to any Program, which shall start operations after	This type includes existing operational projects, not submitted to any Program, which have started operations after 1 January 2016. Such	This type includes those projects, which have been registered with CDM or any Program ⁸ before 1 Jan 2016 but did not start operations at all on the start date of	This type includes those projects, which have been registered with CDM or any Program with the start date of operation only after 1 Jan 2016.	This type of projects includes those CDM excluded CPAs, which have been included in CDM registered PoAs after 1 Jan 2016. Such types of projects shall	This type includes those CDM projects, which have been registered with CDM after 1 Jan 2016, have started operations after 1	This type of projects are similar to Type B1 projects but do not wish to apply for additional certification Labels (related to

⁸ This may include both compliance and voluntary programs, which can cover both GHG as well as non-GHG. For example: (a) compliance project-based GHG Programs can include German Emission Trading Authority (DEHSt); (b) voluntary GHG Programs can include Verra/VCS, Gold Standard, Chinese carbon reduction standard (CCER), etc.; and (c) voluntary non-GHG Programs can include I-REC, etc. If the GCC project activity has been previously submitted or registered with any other program/standard, the Project Owner shall describe in the PSF:

- (a) the information which demonstrates that the GCC project activity does not lead to double counting of the ACCs;
- (b) the historic information on the relationship of the GCC Project with other program/standard and such information shall be traceable and sourced from publicly available resources. In doing this, the Project Owner, prior to submission of request for issuance to GCC Program, shall confirm that the environmental attributes/units for the same vintage have never been requested or issued by any other program/standard;
- (c) The Project Owner shall consider revenues from the sale of the environmental attributes/units to any other program/scheme and include these revenues in the Investment analysis, if applicable, for demonstrating additionality. For example, the revenues from the REC (of India) shall also be included in the Investment analysis.
- (d) The common practice analysis for demonstrating additionality shall be based on CDM Tool for common practice required to shortlist projects based on the start date of Project, as per CDM terminology/definition (is different from the project start date under GCC Program) and shall consider all types of projects from all the programs and shall be considered at the same level/capacity as applied in the Investment analysis.

The GCC Verifier shall verify the information provided in the PSF, including the above required information by reviewing all the relevant standards/programs to confirm that the GCC project is not appearing in any other registries/websites of programs/standards not described. In doing this, the GCC Verifier shall be required to crosscheck the information regarding the consistency of the title of the projects, GPS coordinates, etc.

	submission of a complete GCC registration request.	project types shall make the initial submission to GCC Program prior to 5 July 2022	GSC with GCC program (i.e., CERs/units have not been issued). Such project types shall make the initial submission to GCC Program prior to 5 July 2022	Such project types shall make the initial submission to GCC Program prior to 5 July 2022	have started operations after 1 Jan 2016 (CERs may have been issued). Such project types shall make the initial submission to GCC Program prior to 5 July 2022	Jan 2016 and CERs have been issued.	contribution to SDGs, Do-No-Net-Harm to Environment and Society, Host Country Attestation on Double Counting) and are not eligible for CORSIA label (C+).
Crediting Period allowed under GCC Program	ACCs, with or without certification labels (E+, S+, SDG+, C+), can only be issued by GCC Program, for 10 years.		ACCs, with or without certification labels (E+, S+, SDG+, C+), can only be issued by GCC Program, for the remaining crediting period for which CERs/units have not been issued by CDM Executive Board of the UNFCCC or any authority, subject to a ceiling of 10 years under GCC Program.		ACCs, with or without certification labels (E+, S+, SDG+, C+), can only be issued by GCC Program, for the remaining crediting period for which CERs have not been issued, by CDM Executive Board of the UNFCCC, which shall not extend beyond end date of the 28 years life of the PoA and subject to a ceiling of 10 years under GCC Program.		ACCs, with or without certification labels (E+, S+, SDG+, C+), can only be issued by GCC Program, for the remaining crediting period for which CERs have not been issued by CDM Executive Board of the UNFCCC, subject to a ceiling of 10 years under GCC Program.
De-registration / Exclusion from CDM/GHG Program	NA	NA	While making the submission to GCC program for starting GSC or requesting registration of the project, the Project Owners shall describe in the PSF, whether the project has been deregistered from the CDM/ or under article 6.4 or any Program and provide the following information/ documents as additional Appendix to the PSF choosing either Option 1 or 2. Option 1: Provide, preferably, a proof of deregistration from CDM/ or under article 6.4 any Program; or Option 2:		Exclusion of CPA from the registered CDM-PoA is required prior to submission to the GCC Program		While making the submission to GCC program for starting GSC or requesting registration of the project, the Project Owners shall describe in the PSF, whether the project has been deregistered from the CDM or under article 6.4 and provide the following information/ documents as additional Appendix to the PSF choosing either Option 1 or 2. Option 1: Provide, preferably, a proof of deregistration from CDM or under article 6.4; or Option 2:

			<p>If deregistration from CDM/ or under article 6.4 or any Program is not feasible/possible, the Project Owner shall instead describe the reasons in the in PSF on why deregistration from CDM/ or under article 6.4 or any Program is not feasible/possible and provide the following information/ documents as Appendix to the PSF:</p> <ul style="list-style-type: none"> (i) submit a signed & stamped public undertaking, which states that the Project Owner will never submit any request for Issuance or request for renewal of crediting period to CDM-EB or under article 6.4 or any authority after submission to GCC Program; (ii) submit publicly available evidence which demonstrates that the Project Owner has formally informed, CDM-EB/ or authority under article 6.4 or any other authority of the Program, that the Project Owner will never submit any request for Issuance or request for renewal of crediting period to CDM-EB or any authority under article 6.4 or any authority after submission to GCC Program; <p>At any point in time after registration under GCC Program, if a project is found to have submitted a request for Issuance across multiple programs: (a) the project Owners account in the GCC/IHS Markit Registry will be suspended; (b) project's future issuance requests will immediately be suspended; and (c) the Project Owner shall return the ACCs issued by GCC Program.</p> <p>The GCC Verifier shall confirm the compliance regarding the above requirements and report this in the Project Verification Report.</p>	<p>If deregistration from CDM or under article 6.4 is not feasible/possible, the Project Owner shall instead describe the reasons in the in PSF on why deregistration from CDM or under article 6.4 is not feasible/possible and provide the following information/ documents as Appendix to the PSF:</p> <ul style="list-style-type: none"> (i) submit a signed & stamped public undertaking, which states that the Project Owner will never submit any request for Issuance or request for renewal of crediting period to CDM-EB or under article 6.4 (if and when applicable) after submission to GCC Program; (ii) submit publicly available evidence which demonstrates that the Project Owner has formally informed CDM-EB that the Project Owner will never submit any request for Issuance or request for renewal of crediting period to CDM-EB or under article 6.4 (if and when applicable) after submission to GCC Program; <p>At any point in time after registration under GCC Program, if a project is found to have submitted a request for Issuance across multiple programs: (a) the project Owners account in the GCC/IHS Markit Registry will be suspended; (b) project's future issuance requests will immediately be suspended; and (c) the Project Owner shall return the ACCs issued by GCC Program.</p> <p>The GCC Verifier shall confirm the compliance regarding the above requirements and report this in the Project Verification Report.</p>
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Start date of the Crediting Period of the GCC Project Activity	After registration with the GCC Program, but not more than one year after the Operations Start date	After 1 Jan 2016 but not more than one year after the Operations Start Date	After 1 Jan 2016 and same as that stipulated in the included CDM-CPA Project Design Document (as uploaded on the UNFCCC website) of the registered CDM-PoA.	After 1 Jan 2016 and same as that stipulated in the registered CDM Project Design Document (as uploaded on the UNFCCC website).	
Scope of Assessment	Full Assessment covering GHG and certification labels (E+, S+, SDG+, C+)			Limited Assessment covering certification labels (E+, S+, SDG+, C+) only.	Exemptions in Assessment covering GHG only and limited to basic checks to ensure consistency of information with CDM Registered project documents. Such projects qualify for Automatic registration, if complete documents (including PSF) are submitted as per the Program Process.
CORSIA Label (C+)	Eligible for CORSIA Label (C+)				Not Eligible

Table 2: Comparison of GCC Registration and Issuance Process for various Project Types

Registration Process				
Summary of the Registration Process (as per the Program Process)	Full Assessment Full process for Registration to be applied for GHG emission reductions and for additional certification labels (SDGs, Do-No-Net-Harm to Environment and Society, CORSIA	Full Assessment covering GHG and certification labels (E+, S+, SDG+, C+) as required for Type A projects	Limited Assessment Exemptions in the process to be applied for GHG (for GCC Project	Exemptions in Assessment Exemptions in the process to be applied for GHG (for GCC Project

	requirements), if opted. No exemptions allowed.			Registration only) but full process to be applied for additional certification labels (SDGs, Do-No-Net-Harm to Environment and Society, CORSIA requirements), if opted.	Registration only) as additional certification labels are not opted for such project types. Such projects qualify for Automatic registration, if complete documents (including PSF) are submitted as per the Program Process.
Prepare PSF	All sections in the PSF shall be filled completely with new information as per Instructions for completing PSF and Program Process.	All sections shall be filled completely in a similar manner as is required for a new project as in case of Type A1 project For sections related to GHG emission reductions in the PSF, CDM-PDD or related to GHG Programs/ related approved/registered publicly available documents of the program can be referred but may need to be updated. For sections related to GHG emission reductions in the PSF, the information related to non-GHG, the approved/registered publicly available documents of the program can be referred but may need to be updated/re-written. For additional labels in the PSF, all new information needs to be filled.	All sections shall be filled completely in a similar manner as is required for a new project as in case of Type A1 project For sections related to GHG emission reductions, CDM-POA-DD and CDM-CPA-DD can be referred but may need to be updated. For additional labels, all new information needs to be filled.	All sections to be filled completely as per Instructions for completing PSF and Program Process. For sections related to GHG emission reductions, CDM-PDD can be referred to. For additional labels, all new information needs to be filled.	All sections to be filled completely as per Instructions for completing PSF and Program Process. For sections related to GHG emission reductions, the CDM PDD can be referred to.
Conduct LSC	Shall be conducted prior to conducting GSC	LSC shall be conducted prior to conducting GSC. For CDM/GHG Programs, LSC shall be conducted only for the part within the scope of additional certification labels, if not covered in previously conducted LSC. For GHG emission reductions, it is not required to be re-done as is already conducted under the CDM/GHG Programs. For non-GHG Programs, LSC shall be conducted prior to conduction GSC covering scope which includes both GHG part as well as additional certification labels.			Not required to be re-done as is already conducted under the CDM to cover the part regarding GHG emission reductions.

<p>Conduct GSC</p>	<p>Shall be conducted prior to submitting desk-review Project Verification Report</p>	<p>Shall be conducted prior to submitting desk-review Project Verification Report</p>	<p>Shall be conducted prior to submitting desk-review Project Verification Report and only for the part within the scope of additional certification labels. For GHG emission reductions, it is not required to be re-done as is already conducted under the CDM.</p>	<p>Not required to be re-done as is already conducted under the CDM regarding GHG emission reductions.</p>
<p>Conduct Project Verification under GCC</p>	<p>Project Verification shall be conducted for the scope covering GHG and certification labels (E+, S+, SDG+, C+) as required by Program Process</p>	<p>A fresh Project Verification shall be conducted for the scope covering GHG and certification labels (E+, S+, SDG+, C+) as required by GCC Program Process. Note that CDM Validation Report is not valid and cannot be used for these project types.</p>	<p>Project Verification is only required for verifying the gaps and part of the additional information in the PSF regarding additional labels and any other information not covered by the CDM Validation Report. For sections related to GHG emission reductions, the CDM Validation Report can be referred to.</p>	<p>Project Verification is not required to be conducted as there is no additional information in the PSF regarding GHG emission reductions that is not covered by the CDM Validation Report. For these projects, the CDM Validation Report may be used instead of the PSF.</p>
<p>Submit Request for Registration to GCC</p>	<p>Shall be submitted as per GCC requirements in the Program Process</p>			<p>Shall be submitted as per GCC requirements in the Program Process. If complete documents are submitted as per the Program Process and all of the information</p>

			required in the PSF related to GHG emission reductions is covered by the CDM Validation Report, the Project will be automatically registered.
Issuance Process			
Implementation	Implement & Monitor Project as per GCC Registered documents		
Prepare Monitoring Report	A Project Monitoring Report (PMR) shall be prepared as per GCC requirements in the Program Process.		
Emission Reduction Verification	Emission Reduction Verification shall be conducted as required by Program Process. Emission Reduction Verification Report shall be finalized by the GCC Verifier for the scope covering GHG and/or certification labels (E+, S+, SDG+, C+) as per the level of achievement. The GCC Verifier shall certify the achieved GHG emission reductions with or without certification labels or may consider reduction of scope of the certification labels as per the situation and the level of achievement.		
ACCs Issued by GCC	No retroactive credits issued.	May issue retroactive credits ⁹	May issue retroactive credits. Crediting periods shall be after 1 January 2016
Request for Issuance	Full process for Issuance to be applied for GHG emission reductions and additional labels (if opted) as per the Program Process. No exemptions allowed for issuance process.		

⁹ Retroactive credits mean ACCs that have been generated for the period prior to the date of registration with the GCC Program.

7. Avoidance of Double Accounting in regional Emission Trading Schemes

30. Avoidance of Double Accounting in regional Emission Trading Schemes
- a. The Project Owners submitting A1 or A2 type projects to GCC from the jurisdiction where Emission Trading Schemes are in operation (e.g., European Union Emission Trading Scheme (EUETS), Chinese ETS) are requested to demonstrate that the project is not included (or covered) in the ETS and therefore emission reductions will not be subject to double accounting if ACCs are issued by GCC program. Such demonstration may be based on a letter from official authority¹⁰ of the ETS or authentic publicly available data source. The Project Owner shall describe in the PSF, the information which demonstrates that the GCC project activity does not lead to double counting of the ACCs; and
 - b. the information related to jurisdiction where Emission Trading Schemes are in operation and such information shall be traceable and sourced from publicly available resources.
31. The GCC Verifier shall verify the information provided in the PSF, including the above required information by reviewing all the relevant Emission Trading Schemes to confirm that the GCC project is not appearing in any other registries/websites of Emission Trading Schemes or why it is not possible to be included/covered by certain ETS. In doing this, the GCC Verifier shall be required to crosscheck the information regarding the consistency of the title of the projects, GPS coordinates, etc.

8. De-bundling of a large project activity into smaller components

32. The Project Owners shall demonstrate that the proposed GCC project activity, applying a small scale CDM methodology, is not a de-bundled component of a large-scale project activity in accordance with the applicable provisions in the “Methodological tool: Assessment of de-bundling for SSC project activities”.

9. Typo-error corrections

33. Paragraph 74 of the Project Standard stipulates threshold for limiting ACCs to 20% in case of design change. The document clarifies that the typo error in the GCC Program Manual in paragraph 68 shall be considered as corrected to 20%, instead of 10%.

10. Physical site-visit inspection for the project with multiple sites

34. Irrespective of whether or not a physical site visit inspection is required to be conducted, based on the requirements stipulated in sections 3.2.5 and 3.3.7 of the GCC Verification

¹⁰ A letter from the authority is not required, if the potential GCC project is not included or covered in the information provided on public ETS website. For example EU-ETS website:
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02003L0087-20180408&from=EN>

35. Standard (version 4), the GCC Verifier shall additionally conduct alternative means of verification and/or an online¹¹ remote assessment of all the sites to:
- a. Assess and verify the correctness of the project description or implementation, including
 - i. the corporate identity of the legal owners, Project Owners and the authorized focal point as defined in the Letter of Authorization, PSF and the information on the Project Portal; and
 - ii. technology/measure and the monitoring systems planned or implemented;
 - b. access and verify all the material data reported in the PSF and/or Monitoring report, including that required for determining emission reductions and investment analysis (if applicable), and cross-checked with plant records; and
 - c. evaluate the specific situation and the level of risk for each of the site to identify the high-risk sites or plants or specific elements within these sites, which require to be further evaluated and verified via physical inspection.
36. For any project, having single or multiple sites, requiring a physical site visit inspection, based on the requirements stipulated in section 3.2.5 and 3.3.7 of the GCC Verification Standard (version 4), the GCC Verifier shall develop an overall physical site visit verification plan and implement it accordingly. The overall physical site visit plan shall be developed based on the risk analysis to:
- a. determine the total number of sites required to be visited physically, out of the sites assessed via remote verification, and to be determined based on sampling approaches in accordance with the CDM Standard “Sampling and surveys for CDM project activities and programme of activities”;
 - b. determine any additional sites, considered high-risk based on the outcome of the online remote assessment and as identified in paragraph 32 above, required to be visited;
 - c. determine the sites that have been visited in previous monitoring periods and to be excluded, unless deemed necessary or high-risk by the GCC Verifier; and
 - d. identify any additional sites required to be visited based on the application of the standard auditing techniques as described in section 3.2.4 of the Verification Standard.
37. The GCC Verifier shall describe the alternative means of verification used and justify that they are sufficient for project verification purposes. In doing this the GCC Verifier shall collect the objective evidence, including but not limited to video evidence of the process and status of implementation and operations of the project, pictures of the key equipment showing unique equipment identification or serial numbers as well as the verification team and the key auditees/personnel and key stakeholders interviewed, and include these as part of Verification Report.

¹¹ Where online assessment is not possible, the GCC Verifier may apply other suitable alternative means of verification

DOCUMENT HISTORY

Version	Date	Comment
V 1.3	27/09/2022	<ul style="list-style-type: none"> ▪ Revision to clarify requirements for start date and application of small-scale thresholds and applicable methodological approaches for bundled projects.
V 1.2	29/03/2022	<ul style="list-style-type: none"> ▪ Revised version, containing editorial changes, released to: <ul style="list-style-type: none"> ○ Enhance clarity on subtype 3 under A2 type (refer to Table 1) ○ Enhance clarity on requirements to avoid double counting in the ETS (refer to paragraph 28) ○ Move the Non-binding example of bundling to separate information note: 'Non-binding example of bundling' (refer to paragraph 19)
V 1.1	02/01/2022	<ul style="list-style-type: none"> ▪ Revised version containing small editorial changes (Figure 1, paragraphs 4 and footnote 8d) released.
V 1.0	22/12/2021	<ul style="list-style-type: none"> ▪ Initial version released as approved by the Steering Committee as per the GCC Program Process.



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