

Application of the Oeko-Institut/WWF-US/ EDF methodology for assessing the quality of carbon credits

This document presents results from the application of version 3.0 of a methodology, developed by Oeko-Institut, World Wildlife Fund (WWF-US) and Environmental Defense Fund (EDF), for assessing the quality of carbon credits. The methodology is applied by Oeko-Institut with support by Carbon Limits, Greenhouse Gas Management Institute (GHGMI), INFRAS, Stockholm Environment Institute, and individual carbon market experts. This document evaluates one specific criterion or sub-criterion with respect to a specific carbon crediting program, project type, quantification methodology and/or host country, as specified in the below table. Please note that the CCQI website [Site terms and Privacy Policy](#) apply with respect to any use of the information provided in this document. Further information on the project and the methodology can be found here: www.carboncreditquality.org

Sub-criterion:	2.1.1: Avoiding double issuance due to double registration
Carbon crediting program:	ACR
Assessment based on carbon crediting program documents valid as of:	15 May 2022
Date of final assessment:	08 November 2022
Score:	5

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Assessment

Indicator 2.1.1.1

Relevant scoring methodology provisions

“The program has basic provisions in place which manages the transition of projects from one to another program and either avoids registration of the same project under two programs or, if double registration is permitted, has basic provisions in place to ensure that carbon credits for the same emission reductions or removals cannot be issued under the same program or must be cancelled under one program before they can be issued under another.”

Information sources considered

- 1 The American Carbon Registry Standard. Requirements and specifications for the quantification, monitoring, reporting, verification, and registration of project-based GHG emissions reductions and removals. Version 7.0, December 2020, available at https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard/acr-standard-v7-0_final_dec2020.pdf
- 2 ACR Terms of Use, July 2020, available at <https://americancarbonregistry.org/how-it-works/membership/acr-terms-of-use/acr-terms-of-use-july-2020-clean.pdf>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 10.A.1: “ACR allows for offset project registration simultaneously on ACR and other voluntary or compliance GHG programs or registries in only two circumstances: 1) the **simultaneous registration is disclosed and approved** by both programs/registries, including explicitly through regulation, and 2) **offsets issued for the same unique emissions reductions (project boundary and vintage) do not reside concurrently on more than one registry.**

To prevent double issuance and double use of offsets for projects registered simultaneously on ACR and another GHG program, 1) offsets representing the same emissions reduction must be **publicly canceled from one registry before they can be converted and re-issued on another registry** or 2) offsets can be issued to a project by both programs as long as the **registration of the project under more than one program is disclosed** in writing to the GHG program and the verifier, and the **offset represents unique emissions reductions in terms of location (project boundary) and vintage.**”

Provision 2 Source 1, section 10.A.2.: “For projects transferring from another GHG program to ACR, the project must be validated and verified by an ACR-approved VVB to comply with the ACR Standard and relevant methodology. To avoid double issuance and double use of the same GHG reduction or removal, **any offsets that had been issued that were not transferred, sold, or retired must be canceled from the other program’s registry before conversion and re-issuance by ACR.**

For projects transferring from ACR to another GHG program, Project Proponents must cancel from ACR all offsets that have not been transferred, sold, or retired to allow for conversion and re-issuance of offsets by the other GHG program on its registry.”

Provision 3 Source 2, section 7.d)-f): “Account Holder will only use the Registry for creating, transferring, retiring and/or canceling ERTs or ROCs that are attributable to the GHG reduction or removal projects included in the Registry and specifically acknowledges that it **shall not use any other database for the same purpose** at the same time as such GHG reduction or removal projects are registered in the Registry;

(e) Account Holder **has not registered and will not register any GHG reduction or removal simultaneously both in the Registry and in any other system** that tracks the emissions, emission reductions or removals, emission offsets, or other environmental attributes related to emission reduction and removal projects nor will any transaction of the same emissions, emission reductions and/or removals, emission offsets, or other environmental attributes related to emission reduction and removal projects be conducted outside of the Registry, other than in another ACR approved registry or upon cancelation of ERTs or ROCs for issuance of ARBOCs by ARB;

(f) Account Holder **commits not to claim ERTs or ROCs which have already been or are expected to be registered with another compliance or voluntary emissions reduction and removal program** except as allowed for Early Action offset credits and Registry Offset Credits to be converted to ARBOCs by ARB”:

Assessment outcome

Yes (2 Points).

Justification of assessment

The above documentation specifies that the program allows for registration of the same project under two programs (provision 1), but only under the condition that the simultaneous registration is disclosed and approved and that credits issued for the same emission reductions must be cancelled from one registry before they can be issued under another program (provisions 1-3).

Indicator 2.1.1.2

Relevant scoring methodology provisions

“The program also requires legal attestations from project owners which confirm that they have not and will not request issuance of carbon credits for emission reductions or removals from more than one program.”

Information sources considered

- 1 The American Carbon Registry Standard. Requirements and specifications for the quantification, monitoring, reporting, verification, and registration of project-based GHG emissions reductions and removals. Version 7.0, December 2020, available at

https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard/acr-standard-v7-0_final_dec2020.pdf

- 2 ACR Terms of Use, July 2020, available at <https://americancarbonregistry.org/how-it-works/membership/acr-terms-of-use/acr-terms-of-use-july-2020-clean.pdf>
- 3 American Carbon Registry Monitoring Report Template, version 4, available at https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/acr-monitoring-report-template_version-4.docx

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 10.A.: “To prevent double use, **ACR requires execution of ACR’s legal Terms of Use (ToU) Agreement** by authorized account representatives, clear proof of ownership upon registration, tracking of ownership of credits within the registry by serial number and account, and an **attestation prior to each issuance** of unique, uncontested ownership and legal rights to the emissions reductions as well as **that no emissions reductions issued by and registered on ACR have been serialized, registered, retired or otherwise transacted on another registry and/or by another standard nor have they been transferred, retired or otherwise used or disposed of other than as duly recorded on the ACR registry.**”
- Provision 2 Source 2, section 1: Your use of the Registry and the Registry Site is subject to the following Terms of Use, which constitute a binding contract between you (also referred to herein as “Account Holder”) as user of the Registry and Administrator as administrator and owner of the Registry (Account Holder and Administrator, are individually referred to herein as a “Party”, and collectively referred to herein as the “Parties”). BY USING OR ACCESSING THE REGISTRY, YOU ACCEPT AND AGREE TO BE BOUND BY THESE TERMS OF USE AS MODIFIED FROM TIME-TO-TIME IN ACCORDANCE WITH THE TERMS HEREOF, AND YOU AGREE TO TAKE AFFIRMATIVE RESPONSIBILITY FOR THE COMPLIANCE OF YOUR USERS WITH THESE TERMS OF USE.”
- Provision 3 Source 2, section 7.d)-f): “Account Holder will only use the Registry for creating, transferring, retiring and/or canceling ERTs or ROCs that are attributable to the GHG reduction or removal projects included in the Registry and specifically acknowledges that it **shall not use any other database for the same purpose** at the same time as such GHG reduction or removal projects are registered in the Registry;
- (e) Account Holder **has not registered and will not register any GHG reduction or removal simultaneously both in the Registry and in any other system** that tracks the emissions, emission reductions or removals, emission offsets, or other environmental attributes related to emission reduction and removal projects nor will any transaction of the same emissions, emission reductions and/or removals, emission offsets, or other environmental attributes related to emission reduction and removal projects be conducted outside of the Registry, other than in another ACR approved registry or upon cancelation of ERTs or ROCs for issuance of ARBOCs by ARB;
- (f) Account Holder **commits not to claim ERTs or ROCs which have already been or are expected to be registered with another compliance or voluntary**

emissions reduction and removal program except as allowed for Early Action offset credits and Registry Offset Credits to be converted to ARBOCs by ARB”.

Provision 4 Source 3, section IX, 5. and 6.: “Neither such VERs nor any underlying emissions reductions/removals and/or greenhouse gas attributes to be registered on the ACR have been serialized, registered or retired or otherwise transacted on another registry and/or under another standard or program.

Neither such VERs nor any underlying emissions reductions/removals and/or greenhouse gas attributes to be registered on the ACR have been transferred, retired or otherwise used or disposed of prior to the date hereof, other than as duly recorded in the ACR.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Project developers are required to sign the program’s Terms of Use which constitute a binding contract between them and the program (provisions 1 and 2) and requires credits issued for the same emission reductions to be cancelled from one registry before they can be issued under another program. Additionally, they need to sign an attestation prior to each issuance confirming that no credits issued and registered under the program are simultaneously registered under another carbon crediting program (provisions 1 and 4).

Indicator 2.1.1.3

Relevant scoring methodology provisions

“The program also conducts checks, or requires validation and verification entities to verify, that already registered projects have not, and will not, be issued carbon credits in any other programs for emission reductions or removals for which the program is also issuing carbon credits (unless the credits have been cancelled under other programs prior to reissuance under the current program).”

Information sources considered

- 1 The American Carbon Registry Standard. Requirements and specifications for the quantification, monitoring, reporting, verification, and registration of project-based GHG emissions reductions and removals. Version 7.0, December 2020, available at https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard/acr-standard-v7-0_final_dec2020.pdf
- 2 ACR Validation and Verification Standard, Version 1.1, May 2018, available at https://americancarbonregistry.org/carbon-accounting/standards-methodologies/acr-validation-and-verification-standard-1/acr-vv-standard_v1-1_may-31-2018.pdf
- 3 American Carbon Registry Monitoring Report Template, version 4, available at https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/acr-monitoring-report-template_version-4.docx

Relevant carbon crediting program provisions

- Provision 1 Source 2, section 6.H.: “The VVB shall confirm that projects undergoing validation are not claiming emission reductions for the same project and reporting period on any other GHG registry or platform. This shall be confirmed during every reporting period throughout the project’s Crediting Period.”
- Provision 2 Source 3, section IX, 5. and 6.: “Neither such VERs nor any underlying emissions reductions/removals and/or greenhouse gas attributes to be registered on the ACR have been serialized, registered or retired or otherwise transacted on another registry and/or under another standard or program.
- Neither such VERs nor any underlying emissions reductions/removals and/or greenhouse gas attributes to be registered on the ACR have been transferred, retired or otherwise used or disposed of prior to the date hereof, other than as duly recorded in the ACR.”
- Provision 3 Source 1, section 6.E.: “The monitoring report shall be submitted to the approved VVB during verification and submitted to ACR upon completion of the verification, including any corrections/revisions identified by the VVB.”
- Provision 4 Source 1, section 10.A.2: “For projects transferring from another GHG program to ACR, the project must be validated and verified by an ACR-approved VVB to comply with the ACR Standard and relevant methodology. To avoid double issuance and double use of the same GHG reduction or removal, any offsets that had been issued that were not transferred, sold, or retired must be canceled from the other program’s registry before conversion and re-issuance by ACR.”

Assessment outcome

Yes (1 Point).

Justification of assessment

As part of the validation and verification process, the verification body must confirm that a project is not claiming emission reductions for the same project and reporting period under another crediting program during every reporting period (provision 1). Project developers need to sign an attestation prior to each issuance when submitting their monitoring report, confirming that no credits issued and registered under the program are simultaneously registered under another carbon crediting program (provision 2). This monitoring report is verified by a validation and verification body (VVB) (provision 3). Also, for projects transferring from other crediting programs to the ACR a validation and verification must take place. Given that credits transferred to the ACR must have been cancelled before re-issuance (provision 4), it can be expected that this must also be checked by the VVB.

Scoring results

According to the above assessment, the carbon crediting program fulfills all indicators and thus receives 4 out of 4 achievable points. Applying the scoring approach in the methodology, this results in a score of 5.