

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

Criterion:	5.1 Overall program governance
Carbon crediting program:	Climate Action Reserve
Assessment based on carbon crediting program documents valid as of:	30 June 2021
Date of final assessment:	20 May 2022
Score:	2.50

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Assessment

Indicator 5.1.1

Relevant scoring methodology provisions

“The program has a Secretariat comprised of paid and fully employed staff that is responsible for the administration of the program.”

Information sources considered

- 1 Program website: Staff (<https://www.climateactionreserve.org/about-us/staff/>), last accessed on 28 June 2021.
- 2 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 2, section 4, page 43: “The Reserve is committed to producing high quality GHG project accounting protocols, and to this end uses an intensive multi-stakeholder process to develop its protocols. This approach integrates extensive data collection and analysis with review and input from a diverse range of experts and stakeholders. Reserve staff guides this process to ensure that final protocols adhere to the principles outlined in Section 1.2.”

Assessment outcome

Yes (2 Points)

Justification of assessment

There is no officially designated secretariat or governance documents related to the program’s function. The “Staff” section on the program website clearly defines staff and functions related to the administration of the program such as standard development, stakeholder communications, quality assurance, and other matters.

Indicator 5.1.2

Relevant scoring methodology provisions

“The program provides contact details for the Secretariat on the program’s website.”

Information sources considered

- 1 Program website: Staff (<https://www.climateactionreserve.org/about-us/staff/>), last accessed on 28 June 2021.

- 2 Program website: Contact us (<https://www.climateactionreserve.org/contact-us/>), last accessed on 9 November 2021.

Relevant carbon crediting program provisions

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Assessment outcome

Yes (1 Point).

Justification of assessment

The reserve provides contact details on the website therefore fulfilling the indicator.

Indicator 5.1.3

Relevant scoring methodology provisions

“The program defines who is responsible for the administration of the program and has established formally defined procedures for the decision making process on key programmatic functions, such as the approval of the normative program documents, the registration of projects, and the issuance, transfer and cancellation of carbon credits.”

Information sources considered

1. Program website: Staff (<https://www.climateactionreserve.org/about-us/staff/>), last accessed on 28 June 2021.
2. Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.
3. Climate Action Reserve User Guide. Document issued on August 3, 2016. Online available at: <https://www.climateactionreserve.org/wp-content/uploads/2016/08/2016-Reserve-User-Guide-1.pdf>.

Relevant carbon crediting program provisions

- Provision 1 Source 2, section 3.1, page 22: “This manual contains details on the Reserve’s program, policies, and requirements. Users of the Reserve program, including verification bodies, are subject to the requirements and guidance specified in the most recent version of the Reserve Offset Program Manual.”
- Provision 2 Source 2, section 3.3, page 23: “3.3 Project Registration. This section summarizes the administrative steps a project developer must follow to register a project with the Climate Action Reserve. The timing of project registration may be independent of its start date. In other words, projects may be submitted after they begin operation (subject to the eligibility restrictions on the project start date described above) or

before they begin operation. However, the steps outlined in this section must be followed in order for the Reserve to issue CRTs to a project.”

- Provisions 3 Source 2, section 3.6.1, page 36: “CRTs are issued by the Reserve for actual GHG reductions or removals achieved by a project, as determined in approved Verification Reports. Once a project is registered and the project’s account holder pays the appropriate CRT Issuance Fee, CRTs for verified GHG reductions or removals are released into the account holder’s primary CRT account. CRTs will not be issued until the CRT Issuance Fee is received by the Reserve.”
- Provision 4 Source 2, section 3.6.3, page 37 “Transfer of CRTs. In order to transfer CRTs to another party, that party must have an approved account with the Reserve. There is a transfer fee to transfer CRTs from one account holder to another (\$0.03 per CRT charged to the transferor). The transfer is conducted via the software between the two account holders; the Reserve does not play a role in the transfer.”
- Provision 5 Source 3, section 1.2, page 1: “The Reserve Administrator is responsible for monitoring all project activity and administering certain aspects of user accounts and system data. You may contact the Reserve Administrator at [...].”

Assessment outcome

Yes (1 Point).

Justification of assessment

The program website (Source 1) lists all Reserve staff, and their related functions for the administration of the program. Provision 4 describes the role of the Reserve Administrator. The steps for project registration are described in Section 3.3 in Source 2 (for example Provision 2). Section 3.6 in Source 2 describes how carbon credits are issued, transfer and cancelled under the program (for example Provision 3 and 4).

Indicator 5.1.4

Relevant scoring methodology provisions

“The program is overseen by a Board of Directors or Trustees.”

Information sources considered

- 1 Program website: Board of Directors 8 <https://www.climateactionreserve.org/about-us/board-of-directors/>), last accessed on 26 June 2021.
- 2 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 2, section 2.3.1, page 6: “The Reserve only registers GHG projects that follow protocols that have been developed by the Reserve. In other words, only projects meeting the requirements of protocols that have been approved and adopted by the Reserve’s Board are eligible for registration on the Reserve. The Reserve may establish linkages with additional programs in the future to allow other projects to be registered.”
- Provision 2 Source 2, section 4.2.5, page 45: “The Reserve’s Board of Directors must vote to adopt each protocol. Protocols are presented at quarterly board meetings, which are open to the public, and issues raised throughout the development process are reviewed, giving workgroup members and interested stakeholders a chance to raise any last concerns or questions. After the Board adopts the protocol, it becomes an official Reserve protocol and is immediately available for use.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The program website (Source 1) lists the members of the Climate Action Reserve Board of Directors. More information about the Board's functions and responsibilities, including what is listed in Provisions 1 and 2, can be found in Source 2.

Indicator 5.1.5

Relevant scoring methodology provisions

“All non-staff individuals serving in a professional capacity to support the administration of the program (e.g., members of the Board, advisory groups or expert committees) are subject to conflict of interest provisions to address any financial or other conflicts that may arise in their role supporting the administration of the program (e.g., in providing expert opinions or reviewing quantification methodologies).”

Information sources considered

- 1 Reserve Bylaws (non-public)

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

This assessment methodology is based on publicly available information and documents. There were no conflict of interest provisions for board members and technical committees found in documents publicly available on the website or provided by the program. Conflict of interest evaluations are only in place for the selection of verification bodies.

Indicator 5.1.6

Relevant scoring methodology provisions

“The program has established a code of conduct (or similar document) that identifies the provisions by which program staff and registry administrators must conduct themselves, including conflict of interest provisions to address any conflicts that may arise in the administration of the program (e.g., in registering projects or issuing carbon credits).”

Information sources considered

- 1 Reserve Employee Handbook (non-public)

Relevant carbon crediting program provisions

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Assessment outcome

Yes (1 Point).

Justification of assessment

The program provided a non-public document (Source 1) which describes the code of conduct, including conflict of interest provisions. Employees of the program are required to sign a statement annually that they have read, understood and are in compliance with the policy. It should however be considered that the program publicly states on its website that conflict of interest provisions exist or are signed by the program staff or the document could be published on the website.

Indicator 5.1.7

Relevant scoring methodology provisions

“The program's normative program documents are developed and updated in accordance with formally defined procedures.”

Information sources considered

- 1 Program website: Future Protocol Development (<https://www.climateactionreserve.org/how/future-protocol-development/>), last accessed on 28 June 2021.

- 2 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 2, section 3, page 22: “Reserve Offset Program Manual. This manual contains details on the Reserve’s program, policies, and requirements. Users of the Reserve program, including verification bodies, are subject to the requirements and guidance specified in the most recent version of the Reserve Offset Program Manual. The Reserve Offset Program Manual is considered effective as of the date it is posted on the Reserve website. All account holders and verification bodies are notified when an update to the Reserve Offset Program Manual is released, and the manual is available on the Reserve’s Program Manuals and Policies webpage at <http://www.climateactionreserve.org/how/program/program-manual/>.”
- Provision 2 Source 2, section 3.1.1, page 22: “3.1.1 Revisions to the Reserve Offset Program Manual Between updates, the Reserve may release policy memos that update or replace guidance in the Reserve Offset Program Manual or protocols. These memos are considered effective on the date they are posted on the Reserve website; users of the Reserve program and verification bodies must follow the guidance specified in the memo from that date forward. All account holders and verification bodies are notified when a policy memo is released, and memos are posted on the Reserve’s Program Manuals and Policies webpage at <http://www.climateactionreserve.org/how/program/program-manual/>. In most cases, the contents of the memos are incorporated into the next update of the Reserve Offset Program Manual.”
- Provision 3 Source 2, section 4.3, page 45-46: “After Board approval, the protocols are periodically revised in light of public comments, on-the ground experience, and technological, scientific, and regulatory developments. In addition, the Reserve may review and update performance standards and standardized baselines to ensure they continue to effectively screen projects for additionality and accurately represent “business as usual” emissions. There are two types of revisions to protocols: policy revisions and program revisions.”
- Provision 4 Source 2, section 4.3.1, page 46: “Policy Revisions. Policy revisions are those that affect project definition or eligibility, or that involve significant changes or adjustments to baseline estimation and/or the quantification of emission reductions or removals. A policy revision is generally focused on specific elements of the protocol and is not necessarily an opportunity to revisit all decisions made in the initial protocol development process. Depending on the extent of the revision, the Reserve may convene an expert stakeholder group or reach out to stakeholders involved in the initial protocol development process. This group may be asked to comment on a revised draft protocol or be convened to discuss key issues prior to changes being circulated for comment. All policy revisions require a 30-day public comment period and adoption by the Reserve’s Board. Policy revisions are brought for adoption at the quarterly board meetings or are brought to the executive committee of the Board for adoption if expedited action is required. When adopted, a policy revision creates a

new version of the protocol (e.g., Version 1.0 undergoes a policy revision to become Version 2.0).”

Provision 5 Source 2, section 4, page 43: “The Reserve is committed to producing high quality GHG project accounting protocols, and to this end uses an intensive multi-stakeholder process to develop its protocols. This approach integrates extensive data collection and analysis with review and input from a diverse range of experts and stakeholders. Reserve staff guides this process to ensure that final protocols adhere to the principles outlined in Section 1.2.”

Provision 6 Source 2, section 4.3.2, page 46: “Program Revisions. Program revisions are editorial or technical in nature and do not require a public comment period, nor do they require adoption by the Reserve’s Board. These revisions do not significantly change the policies or eligibility in the protocol, but can change or revise quantification methodologies or monitoring requirements. Program revisions create a new subversion of the protocol (e.g., Version 1.0 undergoes a program revision to become Version 1.1). Program revisions are considered adopted on the date they are posted on the Reserve website. A protocol revision notification is sent to the Reserve’s listserv and to Reserve account holders at that time.”

Assessment outcome

No (0 Points).

Justification of assessment

Provisions 3, 4, 5, and 6 outline the process to update or revise protocols. There were no provisions found describing the process of updating the main normative document – the Reserve Offset Program Manual (Source 2), only the process identifying how the updated versions are released (Provision 2) is provided. The indicator is therefore not fulfilled.

Indicator 5.1.8

Relevant scoring methodology provisions

“Material program updates (e.g., new or updated normative program documents) are subject to public consultation and the process for doing so is clearly defined in the program’s provisions.”

Information sources considered

- 1 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.2.4, page 45: “The revised draft protocol is posted on the Reserve’s website for a 30-day public comment period. The public is notified via the Reserve’s listserv database and other venues, and reviewers are asked to submit

written comments. During the 30-day public review period, the Reserve also hosts a public workshop to solicit feedback and address concerns regarding the draft protocol in an open forum. After receiving written feedback, all comments are recorded and addressed. A final protocol is produced, taking into account public comments and any further workgroup feedback.”

Provision 2 Source 1, section 4.3.1, page 46: “Policy revisions are those that affect project definition or eligibility, or that involve significant changes or adjustments to baseline estimation and/or the quantification of emission reductions or removals. A policy revision is generally focused on specific elements of the protocol and is not necessarily an opportunity to revisit all decisions made in the initial protocol development process. Depending on the extent of the revision, the Reserve may convene an expert stakeholder group or reach out to stakeholders involved in the initial protocol development process. This group may be asked to comment on a revised draft protocol or be convened to discuss key issues prior to changes being circulated for comment. All policy revisions require a 30-day public comment period and adoption by the Reserve’s Board. Policy revisions are brought for adoption at the quarterly board meetings or are brought to the executive committee of the Board for adoption if expedited action is required. When adopted, a policy revision creates a new version of the protocol (e.g., Version 1.0 undergoes a policy revision to become Version 2.0).”

Assessment outcome

No (0 Points).

Justification of assessment

Source 1 contains provisions on public comment periods for protocol revisions (Provision 1 and 2). The Reserve differentiates between two types of protocol revisions: policy revisions and protocol revisions. Policy revisions include significant changes to baseline estimation and/or quantification methodologies. They require a public comment period. Program revisions include mainly editorial or technical changes to the protocol and do not require a public comment period. There are, however, no relevant provisions on general new or updated provisions of programmatic documents that are not protocols. Also, there are no publicly available provisions for public comment periods for the revision of the main normative document (Source 1) itself. The indicator is therefore not fully met.

Indicator 5.1.9

Relevant scoring methodology provisions

“The program actively performs outreach to gather public input when conducting public consultations on material program updates (e.g., through messages on their websites or messages to email listservs).”

Information sources considered

- 1 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 4.2.4, page 45: “The revised draft protocol is posted on the Reserve’s website for a 30-day public comment period. The public is notified via the Reserve’s listserv database and other venues, and reviewers are asked to submit written comments. During the 30-day public review period, the Reserve also hosts a public workshop to solicit feedback and address concerns regarding the draft protocol in an open forum. After receiving written feedback, all comments are recorded and addressed. A final protocol is produced, taking into account public comments and any further workgroup feedback.”
- Provision 2 Source 1, section 4.3.1, page 46: “Policy revisions are those that affect project definition or eligibility, or that involve significant changes or adjustments to baseline estimation and/or the quantification of emission reductions or removals. A policy revision is generally focused on specific elements of the protocol and is not necessarily an opportunity to revisit all decisions made in the initial protocol development process. Depending on the extent of the revision, the Reserve may convene an expert stakeholder group or reach out to stakeholders involved in the initial protocol development process. This group may be asked to comment on a revised draft protocol or be convened to discuss key issues prior to changes being circulated for comment. All policy revisions require a 30-day public comment period and adoption by the Reserve’s Board. Policy revisions are brought for adoption at the quarterly board meetings or are brought to the executive committee of the Board for adoption if expedited action is required. When adopted, a policy revision creates a new version of the protocol (e.g., Version 1.0 undergoes a policy revision to become Version 2.0).”

Assessment outcome

No (0 Points).

Justification of assessment

As for indicator 5.1.8, only provisions for public comment periods, including active outreach for gathering inputs, on protocol updates were found (Provision 1 to 2) – not on the Reserve’s Program Manual itself (Source 1). The indicator is therefore not fulfilled-

Indicator 5.1.10

Relevant scoring methodology provisions

“Material program updates (e.g., new or updated normative program documents) are developed with the participation of experts (e.g., through advisory groups or expert committees).”

Information sources considered

- 1 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 4.2.1, page 44: “To initiate the protocol development process, the Reserve assembles a balanced multi-stakeholder voluntary workgroup, drawing from industry experts, state and federal agencies, environmental organizations, and other various stakeholders. Workgroups are assembled by invitation, but all parties are encouraged to express their interest in participating in the workgroup process. Throughout the protocol development process, the workgroup provides expert review and direct input into the development of the protocol.”
- Provision 2 Source 1, section 4.3.1, page 46 “Policy revisions are those that affect project definition or eligibility, or that involve significant changes or adjustments to baseline estimation and/or the quantification of emission reductions or removals. A policy revision is generally focused on specific elements of the protocol and is not necessarily an opportunity to revisit all decisions made in the initial protocol development process. Depending on the extent of the revision, the Reserve may convene an expert stakeholder group or reach out to stakeholders involved in the initial protocol development process. This group may be asked to comment on a revised draft protocol or be convened to discuss key issues prior to changes being circulated for comment. All policy revisions require a 30-day public comment period and adoption by the Reserve’s Board. Policy revisions are brought for adoption at the quarterly board meetings or are brought to the executive committee of the Board for adoption if expedited action is required. When adopted, a policy revision creates a new version of the protocol (e.g., Version 1.0 undergoes a policy revision to become Version 2.0).”

Assessment outcome

No (0 Points).

Justification of assessment

Provision 1 and 2 show that experts are involved in updating the program’s protocols. However, we could not find provisions on the mandatory involvement of experts on programmatic updates in the Reserves Offset Program Manual itself (Source 1). The indicator is therefore not met.

Indicator 5.1.11

Relevant scoring methodology provisions

“The program has established procedures for receiving complaints and resolving disputes from any carbon crediting program stakeholders. This includes the possibility for project owners to appeal decisions by the carbon crediting program relating to their projects.”

Information sources considered

- 1 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3.5.2, page 36: “3.5.2 Feedback and Grievance Process. For any project type, it is possible that a stakeholder may want to contact the Reserve to provide feedback, either positive or negative. For general feedback or inquiries, stakeholders may contact the Reserve at reserve@climateactionreserve.org, or call the Reserve office at (213) 891-1444. For questions or comments related to a specific protocol, current points of contact are listed on our website at <http://www.climateactionreserve.org/contact-us/>. The Reserve strives to avoid adopting protocols for activities that present a risk of negative environmental or social impacts. However, if a stakeholder has a grievance about a specific project, the initial point of contact would be the same as described above. The staff member receiving this initial contact will collect as much information as possible from the stakeholder about the specific project and grievance. This will then be communicated to the senior management at the Reserve, including the President. The specific action taken will depend on the nature of the grievance.”

Assessment outcome

No (0 Points).

Justification of assessment

The program has a feed and grievance process in place (Provision 1), but no explicit appeal process. The indicator is therefore not fulfilled.

Indicator 5.1.12

Relevant scoring methodology provisions

“Potential issues with the program’s provisions as identified through public consultation or complaints by any carbon crediting program stakeholders, are addressed and the process for doing so is clearly defined in the normative program documents.”

Information sources considered

- 1 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.2.6, page 45: “After Board approval, the Reserve continues to solicit, document, and respond to public feedback and comments on the current version of the protocol. Comments and feedback on adopted protocols can be submitted to the Reserve at policy@climateactionreserve.org. The public is also welcome to contact Reserve staff directly to discuss their comments and concerns. Public feedback and comments are assessed on an ongoing basis and may initiate a revision to a protocol.”

Assessment outcome

No (0 Points).

Justification of assessment

The above documentation applies only to protocols (Provision 1). Provisions defining a process to respond to issues raised by program stakeholders is not included within the normative program documents. The indicator is therefore not fulfilled.

Indicator 5.1.13

Relevant scoring methodology provisions

“The procedure for handling stakeholder disputes and complaints has defined time-bound requirements for the program to respond to disputes or complaints.”

Information sources considered

- 1 Reserve Offset Program Manual. Document issued on 12 March 2021. Online available at: https://www.climateactionreserve.org/wp-content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf. -

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3.5.2, page 36: “3.5.2 Feedback and Grievance Process. For any project type, it is possible that a stakeholder may want to contact the Reserve to provide feedback, either positive or negative. For general feedback or inquiries, stakeholders may contact the Reserve at reserve@climateactionreserve.org, or call the Reserve office at (213) 891-1444. For questions or comments related to a specific protocol, current points of contact are listed on our website at <http://www.climateactionreserve.org/contact-us/>. The Reserve strives to avoid adopting protocols for activities that present a risk of negative environmental or social impacts. However, if a stakeholder has a grievance about a specific project, the initial point of contact would be the same as described above. The staff member receiving this initial contact will collect as much information as possible from the stakeholder about the specific project and grievance. This will then be communicated to the senior management at the Reserve, including the President. The specific action taken will depend on the nature of the grievance.”

Assessment outcome

No (0 Points).

Justification of assessment

There are no clear time-bound requirements concerning the procedure for handling stakeholder disputes and complaints in relation to material program updates.

Indicator 5.1.14

Relevant scoring methodology provisions

“There is no evidence that the current program staff have ever engaged in fraud on behalf of the program or that key personnel have been convicted of fraud. Web searches or other publicly accessible information may inform this indicator.”

Information sources considered

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Relevant carbon crediting program provisions

No relevant findings were identified.

Assessment outcome

Yes (1 Point).

Justification of assessment

Web searches or other publicly accessible information have not revealed any cases of program staff being involved in fraud.

Indicator 5.1.15

Relevant scoring methodology provisions

“The program has never been sanctioned by a regulator or other relevant authority for noncompliance with relevant laws and regulations, or for not complying with its own provisions. Web searches or other publicly accessible information may inform this indicator.”

Information sources considered

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Relevant carbon crediting program provisions

No relevant findings were identified.

Assessment outcome

Yes (1 Point).

Justification of assessment

Web searches or other publicly accessible information have not revealed any cases of noncompliance with laws and regulations or sanctions levied against the program.

Scoring results

According to the above assessment, the carbon crediting program receives 8 out of 16 achievable points. Applying the scoring approach of the methodology, this results in a score of 2.50.