

Validation/Verification Checklist
Guidance Document for Peer Validators and Verifiers

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# Guidance Document Description

This document provides guidance to perform the project validation (the initial project verification) of a project’s activities, as well as subsequent verification of a project's offset data. To help guide validation and verification reviews, this document draws on existing principles from carbon offset programs like the Climate Action Reserve (CAR), the American Carbon Registry (ACR), and the Verified Carbon Standard (VCS). However, this guidance document simplifies the validation process down to the minimum requirements for completing a robust assessment of the project in question.

This guidance document assists the user in filling out the Validation/Verification Report Template. When answering the questions within each section below, record your answers using a narrative format within the corresponding Validation/Verification Report Template section. (Example: To answer all questions within the ‘Eligibility Conditions’ section, review the Project Description Document (PDD) and perform interviews to fill in any information gaps, then report your findings in the corresponding section of the Validation/Verification Report Template). When completing a verification, you’ll also refer to the project’s monitoring report, submitted by the project developer.

# Qualifying Programs

At present, this validation/verification guidance document may be applied to projects listed on [offsetnetwork.org](https://offsetnetwork.org/). These projects follow the Second Nature guidance document on utilizing carbon offsets to fulfill the carbon commitment as peer reviewed offsets. Credits must be retired by the funding entity.

# Validation or Verification Report Building

The validation or verification report must address each of the questions outlined in this guidance document. To build the written report, follow the structure provided by the Validation/Verification Report Template, a companion document found on the Offset Network website.

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# Eligibility Conditions

This section details eligibility conditions the project must meet, including project location, project commencement, legal requirements, and minimum time commitment.

## Project Location:

* Is the project’s physical location identified in the PDD?
* Is there an electronic file available that identifies the project boundaries?
* Does the project’s location comply with protocol requirements?

## Project Commencement:

* When was the PDD submitted to a registry or program?
* To what registry or program was the project document submitted?
* If it was not submitted to a registry or program, what is identified as the moment of project commencement? What signifies that the project commenced?
* When was the initial emissions inventory for the project completed?
* Who completed the initial project emissions inventory evaluation?

## Legal Requirement:

* Does the project identify any legal requirements dictating activities related to the project? List these and describe if they are sufficiently accounted for through the project document.
* Has the project developer provided appropriate records to document compliance with pertinent laws or regulations (if required for this project type)?
* Does the project activity align with any pre-existing or subsequent state, or local laws, statutes, rules, regulations, or ordinances?

### *Minimum Time Commitment:*

* Does the project protocol establish a minimum project term?
* If so, have project developers established a monitoring plan that satisfies the requirements established in the project protocol?

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# Permanence, Additionality, Verifiability, Enforceability, Real (P.A.V.E.R.)

This section seeks to determine the legitimacy of offset credits by evaluating the fulfillment of the P.A.V.E.R. requirements, thereby revealing the quality of a carbon offset. Note that depending on the type of project there may be additional questions that the reviewer should consider assessing.

# Permanent

The reduction must last in perpetuity and the emission reductions cannot be reversed.

* (If the project is a sequestration project) Does the PDD identify for how long the emission will be sequestered?
* Does the PDD identify any threats to permanence?
* If so, does it identify how the project will reduce the risk of reversals?
* Does the project protocol require contributions to a buffer pool?
* If so, does the PDD acknowledge and quantify such contributions, designating them as separate from the available project credits?
* Is the project risk appropriately calculated?

# Additional

The reduction would not have occurred during a business-as-usual scenario. Additionality is very difficult to prove due to its subjective nature, and therefore it is recommended that project participants be interviewed in order to build certainty around the additionality of the project. Refer to Appendix A of this document for instructions to guide interviews with the project operators to gather the information required to answer the below questions that should be answered within the validation report.

* Are all emission reductions included in the calculation of the project’s impact beyond what is required by federal/state/local law, statute, rule, regulation, ordinance, court order, or other legally binding mandates?
* Does the PDD articulate how the project complies with the protocol’s additionality requirements?
* Did implementation barriers (e.g. budget, staffing, capacity, knowledge gaps, local resistance) exist that prevented these emission reductions from occurring in the business-as-usual scenario?
* If yes, is a detailed explanation of existing barriers available through the PDD?
* If yes, is written evidence for the legitimacy of these barriers present and available? If not, is an appropriate explanation provided?
* Based on your judgment, does the project represent an additional reduction in greenhouse gas emissions? (See Appendix A for additional information in determining the project’s additionality).

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# Verifiable

The reductions must be independently monitored and confirmed.

### Does the PDD articulate a monitoring plan that satisfies what is required by the protocol?

### Is the completed monitoring report available for review? If no, is there a template report?

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# Enforceable

The reduction must be counted only once by a single organization and then retired.

* Is offset credit ownership clearly defined through project contracts?
* Does the contract clearly establish unique and uncontested ownership of offset credits among the project parties?
* Has the project generated any credits to date?
* Are the credits stored in a carbon offset registry? If yes, which one?

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# Real

The reduction must be legitimate - not a product of flawed accounting.

* Is the estimate of the project’s impact conservative, legitimate, and reproducible?
* If deviating from the protocol, are the methodologies employed to calculate project impact publicly available and grounded in well-regarded research? (Apply professional judgment)
* Are the project details publicly available? Cite the location where these details are made available to the public (preferably a website’s URL).

# Co-Benefits

* Is the project generating co-benefits?
* If yes, what are the co-benefits of the project?
* Are the co-benefits reasonably assessed?

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# Interview Questions for Project Participants

Conducting interviews with project participants is a principal method to gather the information needed to build the validation report. It is advised that the validator gather as much information from the PDD and then supplement areas that require additional explanation, or areas that are not included within the PDD by interviewing key project participants. Based on the information deemed to be lacking or requiring additional clarification, compile a list of questions and send them to interviewees prior to speaking in person to allow them time to prepare their responses.

Below is a list of sample questions to consider including in interviews, sorted by their applicability to the interviewee’s role in the project:

## Project Owner

* What circumstances/barriers (e.g. lack of funding, lack of resources to coordinate, regulatory barriers) led to the current business-as-usual scenario?
* Which entity will the project offset credits be generated through?

## Project Operators

## Have there been project reversals identified?

## Has the project needed to utilize the carbon offsets buffer pool?

## If this buffer pool needs to be accessed, what steps will the organization take regarding the associated accounting changes?

## Project Maintainer

* Is there a maintenance plan?
* How often will a member of the project team assess the health of the project site?
* Is this data recorded? If yes, where is the data recorded?
* How are issues reported? If applicable, how might the public report an issue?

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# Site Visit

The site visit is the final way that the validator gathers information about a project. A site visit includes an in-person check of at least a statistically significant portion of the site to determine the below requirements. While preparing to visit the project site it is advised to coordinate with the project owner, operator, and maintainer to do a ride-along to assess the following: management practices as performed by the staff, data gathering, and assessment techniques. If no ride-along occurs, the validator must gather this information through interviews, which may be more difficult.

* Are there inconsistencies between the implemented project and the PDD?
* Are there appropriate explanations?

**Assessment of Management Practice**

As a validator, it is important to assess the project in question to ensure management and maintenance practices follow the protocol’s stated guidelines and relevant management plans for the project.

# Building the Validation or Verification Statement

The Validation or Verification Statement should be a concise one-page overview/summary of the validation or verification report. Identify key pieces of information from a high-level perspective and include any issues or items that require additional action relating to the validation/verification report findings. As a summary document, this statement will function to highlight the findings of the validation/verification report, and may refer to the report’s sections for additional detail and explanation. The Validation/Verification Statement should include:

* Determination of the project’s fulfillment of PAVER requirements
* Assessment of the legitimacy of the project impact estimate (for validation) and assessment of the project’s actual impact based on monitored data (for verification)
* Timing of project events (monitoring events, verifications, etc.)
* Determination of the project’s legitimacy and ability to generate carbon offsets

# Appendix A: Guidance to gather data for Additionality

*This section offers suggestions on additionality validation questions to ask during a phone call with someone involved in project development. This guidance was written and developed by UC-Berkeley Research Fellow, Barbara Haya, and adapted by Second Nature.*

Assessing additionality can be the trickiest part of the validation process. The challenge is that you must assess whether the offset program was necessary in enabling the project to go forward (ex: would the trees likely have been planted regardless of the offset program?) In most cases the answer will not be obvious, and we’ll rely on your judgment. In many cases, it can be clear that offsets helped the project move forward, but less clear if it was a make-or-break factor. The additionality section of this validation report presents your level of confidence in the project’s additionality, and the factors that influenced your assessment.

An offset program can influence project implementation in several ways.

If the income generated by the offset program is enough to pay for the full cost of project implementation and maintenance or most of those costs, then there is a good chance that the project is additional. The main assessment you’ll need to make in this case is whether project components implemented because of the offset program are beyond what would likely have been implemented without the offset program. In other words, is the project owner using university funds to fund a program they would have done themselves otherwise? What similar projects or programs are already in place, or were already being planned? Are any offset credits being generated from project implementation that would have been implemented by the existing/planned program? If not, were sufficient funds already available, or was the program financially constrained so that the new income would enable the plan to be achieved in full? If the offset program pays for an existing project that is sufficiently funded or pays for project components that would otherwise have been implemented, then the project is non-additional.

If the income generated by the offset program partially pays for the cost of implementation and maintenance, then most likely the offset program is responsible for the portion of the project it pays for. You will ask questions to assess if there is an existing project, or one that was planned. If so, either the offset program project components should be beyond existing plans, or you should find that the current program is resource-constrained so that new funds enable the existing plan to be achieved.

Some project owners might claim that the entire project is caused by the offset program, even if the offset program only pays for a portion of the project costs. In this case, the burden is on the project owner or developer to clearly demonstrate this. They would need to show that the project was not an existing or planned policy (including the plan for funding/implementation), and that the offset program was a catalyst in making the project happen. You could request a letter from the project owner describing this influence, or the project developer could show you email exchanges, or Board minutes that describe the deliberations and the clear influence of the offset program in creating the project and inspiring the investment of funds from others. If enabling a new project, there should be a definitive time commitment identified over which offset funding will assist in establishing the project. At the end of this time commitment, which is not to extend beyond 5 years, the project is considered to be established (and non-additional), and offset funding must shift to the above definition of additionality: additional project components are those funded by the credit purchaser, calculated by determining the offset budget’s proportion of the total project budget. The percentage contributed towards the overall project budget is applied to the number of project components implemented that year to identify the number of additional project components.

Example (for a tree planting project):

Y budget contribution / Total Budget = X%

X% \* Total number of Trees Planted = number of Additional Trees

The additionality of the project is subjective and tricky. For most situations, there is not a clear set of indicators. Each project is different. The below sets of queries are minimum topics you should cover and report on. In the course of your interview you will likely need to ask more questions that are specific to the particular project you are validating. You will report your verdict about the project, along with the reasons for that verdict, which will help the Offset Network assess whether the offset project meets the Peer Verification guidelines.

**Questions to ask:**

It is advised to start off by asking any of your own questions you have about the project. In addition to gathering initial information, this also helps you develop some comfort in talking with the interviewee.

**Specific Project in Question:**

Ask about the history of the project and the decision to execute the project. Encourage the interviewee to tell you the story of the project.

Go over the project budget to figure out how much of the project costs are covered by the offset project. What are the project (both implementation and maintenance) costs? What was the offset sales arrangement (Upfront payment? Or sales each year? Or a combination?) How much are the offset revenues expected to be and how much of the overall project costs do they cover?

Here you are trying to assess the importance of the offset income in making the project financially viable.

**Implementation Program:**

What was the project owner’s implementation program for any similar projects in the past five years (or five years prior to the start of the offset project)? Was there any difference between the targets set during project planning and the targets met by implementation of the offset project? If so, why? (This second question assesses whether the plan is resource constrained – did they implement all the project components in the plan, or were they unable to meet the goals of the plan, and why?)3

Do they have plans to change that program going forward (expand or shrink)? And if so, how are they planning to fund the program? (Again, this second question attempts to determine if the plans are resource- constrained.)

Ask about the interviewee’s understanding of the additionality of the project. Ask this directly: Would the project have happened without the offset program? What was the influence of the offset program on the implementation of the project? Are you confident about this? Why?

These questions could lead to many different follow-up questions. You should probe the story you’re being told. See notes above on the types of questions you might want to ask for different situations, and the types of evidence they can show (e.g. project budgets, board minutes, email exchanges).

**Final verdict (check all that apply and include these answers within the verification report)**

**Additionality Determination:**

* I am certain (completely sure) that the project is additional. State why.
* I am confident (it is highly likely) that the project is additional. State why.
* It is clear that the offset program helped make the project happen, but I am not confident that the offset generation activities claimed under the offset program would not have been implemented without the offset program. State why.
* The additionality of the project is questionable. Describe why.
* The additionality of the project is unlikely. Describe why.

**Project Determination:**

* I cannot think of a scenario in which the project would have happened without the offset project.
* I can think of one or several scenarios in which the project is non-additional, but none seem likely. Describe.
* I can easily think of one or several scenarios in which the project is non-additional.
* It seems that the project would most likely have occurred without the assistance of the offset project.