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Methodology Approval and Development Process

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Version 1.2

Status: Final

Change log

Changes from version 1.1 to version 1.2:

Change reason	Change type	Relevant section(s)
External review	Improved the approval process of third party methodologies	4. Approval of third-party methodologies by Proba
External review	Added process for specific knowledge that lies beyond the expertise of the PTC	4. Approval of third-party methodologies by Proba
External review	Updated methodology development process to allow for scientific review instead of expert review.	5.1 Methodology development process
External review	Updated methodology development process to allow decision by PTC on sequential order of external feedback.	5.1 Methodology development process
External review	Addressed potential COI between Proba and methodology sponsor	5.1 Methodology development process
External review	Updated the annual review process of approved methodologies	6. Review of methodologies

1. Introduction

Methodologies, in the context of a GHG Project, refer to the systematic set of procedures and criteria used to quantify, monitor, and verify greenhouse gas emissions reductions or removals.

Proba has set up this process to provide guidelines on which methodology to choose and, where necessary, develop a new methodology. In section 3 of this document a set of quality criteria to assess methodologies is described.

Within the Proba Standard it is possible to use open and publicly available methodologies which are approved by other GHG programs. Proba has a procedure in place to approve these methodologies, as explained in section 4.

Additionally, Proba aligns with the “development and review requirements” of methodologies as described in ICVCM’s Core Carbon Principles.

In case a GHG project wants to use a new methodology, Proba will first evaluate if there is an existing methodology that can be used. In case there is no (suitable) existing methodology, then the project developer and Proba will work together to find an appropriate way to develop a new one. This is explained in section 5.

Proba will conduct a periodic review of each previously accepted or developed methodology. Details of this review process are described in section 6. Methodologies that are not reviewed timely or without positive outcome, will be deprecated.

2. Public availability

All approved methodologies are published on the Proba website: https://proba.earth/methodologies. Each methodology listed contains the official name of the methodology, the name of the GHG program (in case it is a methodology by a third-party, otherwise this will be Proba), version of the methodology, and a link to the document or the download section of the methodology. Methodologies that are not approved yet, can be found in the pending section on the webpage.

The inactive section on the webpage contains methodologies that need revision, are revoked or are deprecated.

3. Methodology criteria

Proba has developed the following set of quality criteria to assess methodologies. Proba will use these criteria to approve external methodologies and develop its own methodologies.

3.1 Permission to use

The project developer should be permitted to use the proposed methodology. This implies that the methodology is copyright free or the project developer is licensed to use a copyrighted methodology. In case permittance to use the methodology is unclear, Proba will contact the approved GHG program to make sure the proposed methodology can be used.

3.2 Business and mitigation potential

The potential GHG emission reductions and/or removals of Proba projects under the proposed methodology is expected to be significant. Proba expects to have multiple GHG projects that will use the methodology.

3.3 Alignment with regulations and other voluntary frameworks

Methodology should align with recognized standards and guidelines (e.g. ICVCM, ICROA, ISO, CDM) to ensure credibility. Formal assessment or approval by these bodies is not required.

3.4 Solid scientific foundation

The proposed methodology should be developed on sound scientific principles and peer-reviewed research.

3.5 Key methodological components

The proposed methodology should contain key methodological components that enable the GHG project developer to comply with the Proba Standard.

- **Baseline determination:** The methodology should provide clear guidelines for the determination of the baseline scenario of the GHG project.

- **Additionality:** The methodology must ensure that the GHG mitigations would not have occurred without the project and are additional to any that would occur in the absence of the project.
- **Robust evidence and quantification:** The methodology should make use of reliable data sources and if possible make use of actual field measurements and empirical evidence.
- **Conservativeness**: The methodology should use estimates of GHG mitigations that are made conservatively to avoid over-crediting
- **GHG Calculation formula**: The methodology should include a clear definition of all data points and metrics needed.
- **Permanence:** The methodology should propose measures to determine the level of certainty that the GHG emissions will not be re-released into the atmosphere. The Proba Standard requires a minimum of 40 years for Storage Duration.
- **Monitoring, validation and verifiability:** The methodology should produce estimates that can be validated and results that can be verified by independent validation and verification bodies.

3.6 Easily understandable

The proposed methodology should be written in a clear simple way that is easily understandable for every stakeholder. The methodology should at least cover the following items:

- Overview of the GHG mitigation methods used
- Eligibility criteria
- Cover the key methodological components mentioned above
- Clear explanation of the calculation methodology

3.7 Clear and thorough development process

The proposed methodologies must have been through a thorough development process. This implies that the methodology has been developed by an expert working group, follows an iterative process and the methodology has sought external feedback through a public consultation process and has processed comments received. Incorporating feedback from public consultation can enhance the robustness and acceptance of the methodology, ensuring it is well-rounded and considers a wide array of concerns and suggestions. It also promotes stakeholder buy-in and the legitimacy of the GHG project in the public eye.

3.8 Review and update mechanism

Proposed methodologies should have a process to be periodically reviewed and need to be updated where needed. The methodology should stay in line with the latest scientific consensus and regulatory requirements.

3.9 Risks and uncertainties

The proposed methodology should indicate which potential risks are involved and how they can be mitigated. Methodologies will not be approved if they are associated with unmitigable social, environmental, legal, or regulatory risks.

The methodology should transparently disclose how the factor of uncertainty is addressed. Methodologies can use qualitative measures by discussing the sources of uncertainty and the confidence in the data and methods used. Or the methodology can provide quantitative estimates, such as confidence levels (e.g., a 95% confidence interval) or uncertainty ranges, to express the precision of the GHG benefit calculations.

4. Approval of third-party methodologies

Methodologies can be proposed by Proba or GHG project developers. Both follow the same process.

1. Methodology is proposed for approval
2. Methodology will be moved to the pending methodologies section on the Proba website
3. The Proba Technical Committee (see https://proba.earth/proba-standard for details) evaluates the methodology using the criteria described in section 3 and makes a proposal for the Proba Management Board. The Proba Technical Committee can also take into account external reviews and ratings on externally developed methodologies.
4. The Proba Management Team reviews the proposal and determines if the methodology can be approved. Proba Management Board can decide that a proposed methodology is approved without all criteria being met.
5. When the methodology is approved, it will be added to the Approved Methodologies section on the Proba website.

All third-party methodologies submitted for approval by Proba will be assessed against the methodology criteria outlined in Section 3 of this document. This assessment ensures that each methodology meets the required quality criteria, including scientific robustness, transparency, and regulatory alignment. Proba will systematically evaluate compliance with these principles before approval, and this will be documented in the methodology review process.

If a proposed third-party methodology lies beyond the expertise of the Proba Technical Committee (PTC), the PTC will identify and involve external experts with relevant domain knowledge to assess the methodology. This process will ensure that methodologies undergo thorough scrutiny and align with Proba's quality principles before approval. The selection of external experts will be based on their academic and professional experience, and their participation will be disclosed in the methodology approval documentation.

5. Proba methodology development

5.1 Methodology development process

Proba will determine if and how the proposed methodology can be developed.

1) **Methodology idea:** Methodologies can be proposed by Proba or GHG project developers. Both follow the same process. The methodology idea will result in a short description of the proposed methodology, which includes the context and boundaries in which it will be used.
2) **Decision on methodology development:** Proba will take the following points into consideration when deciding on the development of a new methodology.
    a) Proba determines the CO_2 mitigation and business potential (high or low) of the proposed methodology. Based on the potential of the proposed methodology, Proba will decide if the methodology will be developed.
    b) For methodologies with high potential, Proba will determine which funding is needed, and who will pay for the development of the methodology. To address potential conflicts of interest (particularly when sponsors are also potential users of the methodology), Proba will establish clear governance, a public consultation round, and an independent, external review to safeguard integrity.
    c) Proba will decide if the methodology will be developed internally or will be developed externally by a third-party methodology developer.
3) **Create draft methodology:** Methodology developer (either internal or external) starts developing draft methodology. As soon as the creation of the draft methodology has started, Proba will publish the methodology under the "pending" section on the webpage: https://proba.earth/methodologies
4) **Decision on sequential order of external feedback:** The Proba Technical Committee (PTC) decides on the sequencing of external feedback. The default sequence is to publish the methodology for public consultation first, followed by expert feedback via an expert or scientific review. However, the PTC can decide to perform the expert review first. This sequence is chosen when:
    - The methodology is technically complex and novel, requiring strong scientific grounding.
    - The methodology introduces new quantification approaches, baselines, or monitoring frameworks.
    - There is a high reputational risk if flawed assumptions or errors are exposed publicly.
    - Public feedback is expected to be primarily non-technical (e.g., focused on usability, clarity, fairness).

5) **Publish methodology for public consultation:** Proba will publish the methodology on the public consultation page for public comment (see https://proba.earth/public-consultation) for a period of 30 days. Proba can decide to extend this period for methodologies of higher complexity or due to insufficient feedback received. Proba will make a diligent effort to collect feedback on the methodology from a balanced set of stakeholders. All stakeholders that have been identified and actively approached will be listed by Proba in a feedback document. In this document, all used channels will also be summarized.
6) **Process feedback from public consultation:** The Proba Technical Committee will summarize all feedback received and explain in a feedback and response document how the feedback has been processed. An updated version of the methodology will be shared with a VVB or scientific committee for an expert review.
7) **Expert review or scientific review:** The review can be conducted by either a VVB or by a scientific expert or scientific committee. The nature of the methodology will determine which option is preferred. It is up to the Proba Technical Committee to decide which option is most relevant.
    a) VVB performs an expert review of the new methodology. Proba requires VVBs to apply using the VVB application form[1] and follow the VVB approval procedure as defined in the Proba Standard[2]. VVB is encouraged to use the Proba Expert Review Guidelines template[3] to perform the expert review. Based on the expert review feedback Proba will make appropriate changes to the methodology and discuss these changes with the contracted VVB. Feedback and response will be combined in a separate feedback document and published on the methodology website.
    b) The scientific expert or scientific committee performs a scientific review on the methodology.
        i) The scientific review can be executed by one person or a group of knowledgeable experts (scientific committee).
        ii) The scientific experts need to comply with the same integrity and independence requirements for the VVB as described in section 4.8 of the Proba Standard.
        iii) To demonstrate their expertise, the scientific expert should provide professional qualifications related to the context of the methodology. This includes at minimum:

[1] https://proba.earth/hubfs/Downloads/Proba_VVB_Application_Form.pdf
[2] https://proba.earth/hubfs/Product/The_Proba_standard.pdf
[3] https://proba.earth/hubfs/Downloads/Expert_Review_Guidelines_template.pdf

(1) Relevant scientific degree: A degree in a relevant scientific field (e.g. environmental science, chemical engineering, agronomy);
(2) Relevant professional experience: Documented practical experience in areas directly related to GHG emissions and the (sectoral) scope of the methodology. This can include memberships in relevant associations.

iv) The proof of expertise will be documented by Proba, but will not be published on the Proba website.
v) The proof of expertise needs to be approved by the Proba Management Board before the scientific expert can begin with the expert review of the methodology.
vi) The approval of the scientific experts is valid only for the specific methodology and needs to be repeated for future methodologies.
vii) The scientific expert is encouraged to make use of the Proba Expert Review Guidelines template to perform the expert review.

8) **Final approval of methodology by Proba Management Board:** After the expert review, the Proba Technical Committee will inform and advise the Proba Management Board on the findings from the public consultation, the expert review and the latest improvements made to the methodology. The Proba Management Board can request additional changes if needed or approve the methodology.
9) **Assessment of the development process by Proba Standard Advisory Board:** After the approval of the Proba Management Board, the Proba Technical Committee will inform and advise the Proba Standard Advisory Board on the findings from the public consultation, the expert review and the latest improvements made to the methodology. The Proba Standard Advisory Board may either approve the methodology development process or request further changes if necessary.
10) **Publish active methodology:** After all feedback has been processed and the methodology has been approved, the new methodology will be published on the website in the methodologies section under “Approved methodologies” including the feedback and response documents from public consultation and expert review (see: https://proba.earth/methodologies).

5.2 Methodology development guidelines

Each methodology developed by Proba is different, which reflects the complexity and maturity levels of various GHG reduction and removal methods. However for each developed methodology the following should apply:

- The new methodology must be in line with the general principles described in the Proba Standard.
- The new methodology must be in line with the criteria described in section 3 of this document.

Each methodology will be drafted using the internal Proba methodology development template.

6. Review of methodologies

Methodologies developed by Proba will be reviewed every five years. A review will also be made when significant changes have occurred, such as regulation, technologies, scientific progress or other relevant market developments.

For methodologies from third parties that are approved by Proba, Proba will screen the methodology and the methodology developer once a year.During this annual check, Proba will review the following steps:

- Proba will screen the methodology and the methodology developer on any bad news and bad publicity;
- Proba will re-assess the approved third party methodology against the methodology criteria of section 3;
- Proba will check if there is a new version of the methodology available.

Reviews will be executed by Proba, who can decide to use input from external stakeholders like project developers, validation and verification bodies, or qualified experts.

- For approved methodologies, Proba will address any issues found with the external owner or GHG program.
- For developed methodologies, Proba may decide to temporarily inactivate the methodology at any time during the review process. Inactivated methodologies will be moved on the website to the under review section. The issuance of credits using this methodology will be suspended until a new version of the methodology is active.

For minor revisions, Proba will update the methodology and publish it directly.

For major revisions, Proba will publish the changes for public consultation.

For minor and major revisions that can be perceived as improvements and are not related to any flaws in the methodology, there are no consequences for running projects. However, should a project request a renewal of the crediting period, the latest

version of the used methodology(ies) must be applied during monitoring, validation and verification.

However in case a revision identifies a flaw in the methodology, or should a methodology be deprecated or revoked, Proba may decide to suspend or even cancel the issuance of new Proba certificates.

For issues that can’t be resolved in the methodology, Proba will inactivate the methodology and move it to the “inactive” section on the methodologies website.