

# Feedback and response

## Proba Standard version 1.0 and all supporting documents

August 2024

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## Intro

In December 2023 Proba published the 1.0 version of the Proba Standard. After this publication we have received feedback from multiple stakeholders. The Proba Standard Advisory Board (PSAB) has also performed an extensive review of the Proba Standard. Proba has also included feedback on supporting documents to the Proba Standard.

This document summarizes this feedback and describes how Proba responds to this.

During public consultation of the updated 1.1 version, we will make this feedback document available on our website. The document can be used by stakeholders to better understand the background of the changes the Proba Technical Committee (PTC) has made to the 1.1 version of the Proba Standard.

## Feedback and response

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	1.2 Organization, roles and responsibilities
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Who is in the Proba Technical Committee
<b>Response</b>	Proba has added a reference to the Proba website where Proba Technical Committee members are listed.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	1.6 Proba Technical Committee
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Explain the specific process for the public consultation of the Proba Standard
<b>Response</b>	Proba has introduced a new document, the Proba Standard Quality & Governance document. In Section 2 the quality assurance of the

	Proba Standard review cycles is further specified, and more specifically the process and assessment of the public consultation phase is described.
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<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	1.9 Standard Development and Review
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Maintain a list of changes for the PSAB
<b>Response</b>	Proba has added a change log including a change reason and a change type to the Proba Standard. Next to the change log, Proba has introduced this feedback and response document prior to public consultation feedback

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	3.1: Project design
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Unclear statement about projects from third party carbon credit programs
<b>Response</b>	Proba has updated and rewritten the Project design section in section 3.4 of the new version of the Proba Standard.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	4.2 Avoid Double Counting
<b>Source of</b>	PSAB review

<b>feedback</b>	
<b>Feedback</b>	Explain how Proba deals with emission reductions or removals that are also reported under a national, jurisdictional, or sub-national programs
<b>Response</b>	Proba has updated and rewritten the Avoid Double Counting section which is now in section 5.7 of the new version of the Proba Standard. “Emission reductions or removals that are reported under any regulatory or mandatory program are not eligible for Carbon Credits.”

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	4.4 Permanence of the Carbon Yield
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	How does Proba encourage longer permanence?
<b>Response</b>	Proba has updated and rewritten (replaced encourage with recommend) the Permanence section which is now in section 3.8 of the new version of the Proba Standard. The Storage Duration for each GHG Project and issued Carbon Credits are clearly communicated, which should incentivize projects to aim for longer permanence.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	4.5 Additionality requirements
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	GHG projects that seek compliance with the Proba Standard must adhere to <u>all</u> Additionality definitions, not to one of three
<b>Response</b>	Proba has updated the additionality requirements which is now in section 3.6 of the new version of the Proba Standard. Interventions

	from GHG projects that seek compliance with the Proba Standard must adhere to all three of the Additionality definitions
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<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	5.4 Proba Project lifecycle
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	How can PMB validate the POD and judge these complex projects in so different industries?
<b>Response</b>	Proba has moved the Project lifecycle to chapter 2 and has made quite some changes to this section. The Proba Eligibility Check has been added as a separate section as part of section 2.2 Project Design. This section explains the steps in the eligibility check process. The PTC will prepare an Eligibility Decision memo which is used for the Eligibility Check. The Decision Memo contains a brief description of the project, the points of attention, and a substantiated recommendation. As the Proba Standard Quality & Governance document indicates, the Eligibility Decision Memo template, which supports this check, is reviewed once every three years by the PTC.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	5.4 Proba Project lifecycle
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	What qualifies a VVB? Should the validation not include many more issues than only risks?
<b>Response</b>	In section 4.8 Proba has described the VVB requirements and added more specific qualifications. These qualifications are now also requested via the VVB application form. In section 2.4 Project Validation, the 1.1 version of the Standard

	explains that the VVB validates the POD against the Proba Standard and the selected methodology. The VVB can use the methodology-specific guidelines for project validation and verification to perform the Validation. As the Proba Standard Quality & Governance indicates Proba recommends VVBs to use the Proba Validation template which can be found on our website in the document library.
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<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	5.4 Proba Project lifecycle
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Regarding small scale projects, how do potential project developers know if their project is eligible for this exception? Who takes the final decision on this? And what are the motivations to allow for this?
<b>Response</b>	The decision to allow a request from a small-scale project to use a simplified validation and verification process will be part of the Eligibility Check. The Proba Management Board will be responsible for this decision. This usually consists of Validation and Verification by a knowledgeable expert, without the necessary accreditations of a VVB. The exception will be extensively documented and explained.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	5.6 Verification Procedure
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Regarding the frequency of the verification, is this approved up-front with the approval of the POD?
<b>Response</b>	Guidelines for the frequency of the verification should be provided

	by the methodology (based on activities, sector practices, project total duration, risks etc). The POD and applied methodology will be part of the Validation of the project.
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<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	6.2 VVB Oversight / 6.3 VVB Accreditation and Qualifications
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	<p>Usually, the scheme owner (=Proba) also has the task to 'train' VVBs on their specific standard. However, how does the project developer ensure this? Are there rules for a maximum of e.g. 3 consecutive audits by the same auditor?</p> <p>How is managing VVBs performance, ensured by Proba? Is there a check done after a certain # of verifications for ex.?</p>
<b>Response</b>	<p>Proba has updated the VVB Oversight section 4.10. The VVB oversight section in the Proba Standard Quality and Governance describes the procedures that Proba has in place to maintain oversight over VVBs. Proba has introduced standardized VVB templates for training and capacity building of new VVBs.</p> <p>Proba has defined a VVB rotation period of 5 years as part of section 4.5 Verification Procedure.</p>

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	6.3 VVB Accreditation and Qualifications
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	On independent verification, who has the burden of proof and who checks this?

<b>Response</b>	Proba has a Code of Conduct for VVBs. Each VVB is required to adhere to our Code of Conduct for VVBs. This has been added to the Proba Standard in section 4.8
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<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	7.6 Credit Cancellation
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Who is responsible for credit cancellation? We would rather think of the PMB instead of PSAB?
<b>Response</b>	Proba has updated the procedure of credit cancellation and the responsibility lies with the PMB.



## 1.1 feedback [remove this]

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	Change log
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	It should be clear on the basis of what these changes have been done: external feedback, internal review, and indicate the nature of changes e.g. correction/clarification or also content-related.
<b>Response</b>	New structure of change log introduced.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	Overall, multiple sections
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	When can a project use insetting, when offsetting? What are the exact rules for claiming in insetting scenarios throughout a supply chain?
<b>Response</b>	We acknowledge that insetting requires further (supply chain specific) detailing on rules for claiming. And that the Standard may differentiate more between the rules applying to insetting and offsetting. Proba, our customers and the voluntary carbon market in general are working on this. We expect that the next major update on the Proba Standard will address these developments.

<b>Document</b>	Proba Standard
<b>Document</b>	1.1 Internal review

<b>Version</b>	
<b>Section</b>	Definitions & Abbreviations
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Consider moving the list of definitions and abbreviations to the end of the document, into the appendix or into a separate document that can be referred to by multiple Proba documents.
<b>Response</b>	We believe moving this into a separate document is a good suggestion and we have placed this on our backlog for a next revision.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	Definitions & Abbreviations: Carbon Credit
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Is AR-6 not yet endorsed?
<b>Response</b>	Based on our current understanding, UNFCCC still endorses AR-5 values. We have included a re-evaluation on our backlog and aim to adopt AR-6 as soon as possible.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	2. Eligibility Criteria
<b>Source of feedback</b>	Project developer
<b>Feedback</b>	The Proba Standard is not clear enough on the rules for retroactively onboarding existing projects (projects that have already started before validation or project design).
<b>Response</b>	TODO

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	2.3 Public Consultation
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Clarify that the English version should always be leading.
<b>Response</b>	We have included this requirement for translated versions of the POD.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	2.3 Public Consultation
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Include as a requirement that the consultation should be effectively announced to relevant stakeholders.
<b>Response</b>	We have included this requirement.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	2.3 Public Consultation
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Proba should have the option to review the project again, based on changes in the POD and feedback/responses from the public

	consultation.
<b>Response</b>	Clarified and added the option for a new eligibility check.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	3.4 Project Design
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	It should be clarified that it is not about double issuance of carbon credits only, but also about preventing double counting.
<b>Response</b>	We have the prevention of double counting more explicit.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	3.6 Additionality Requirements
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Clarify that Regulatory/Political Additionality is evaluated for the crediting period.
<b>Response</b>	We have clarified this in the text.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 Internal review
<b>Section</b>	x

<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Allowing the existence of (ineffective) agreements between states and specific sectors to exist in the context of Regulatory/Political Additionality leaves a lot of room for interpretation.
<b>Response</b>	We are well aware of the often case-by-case evaluation of additionality. We have made adjustments to the text to leave less room for interpretation. Note that the methodology provides additional rules and guidelines on assessing additionality. We have clarified that in the text.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	3.6 Additionality Requirements
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Shouldn't Proba exclude subsidies that may become applicable during the project period or crediting period? We should avoid double financing.
<b>Response</b>	Often both subsidy and carbon financing are needed to make emission reduction initiatives viable. Therefore we do not exclude GHG Projects that may also receive subsidy. We did clarify that the Project Developer is required to be transparent on receiving subsidies.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	3.9 Quantify GHG Yield: Leakage risk mitigation
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	It is not clear what happens when the Project Developer cannot submit an ISO 14001 certificate.
<b>Response</b>	We clarified this in the text: the Project Developer is expected to maintain a risk management plan in which the leakage risk mitigations are sufficiently addressed.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.1 Segregation of duties
<b>Source of</b>	PSAB review

<b>feedback</b>	
<b>Feedback</b>	Preferably two different VVBs perform the Validation of the POD and the Verification of the Yield.
<b>Response</b>	We agree and have included this in the text.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.3 Project Boundary Change/Extension between Verification rounds
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	It is unclear what the consequences are of extending the scope.
<b>Response</b>	We clarified that Proba may require re-validation of the GHG Project by the VVB or include a site visit (at minimum) on the next verification event.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.4 Validation Procedure / 4.5 Verification Procedure
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Improve the explanation of the usage of VVB validation and verification templates
<b>Response</b>	We clarified that VVBs may deviate and use their own templates as long as the elements from our guidelines are covered.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.4 Validation Procedure / 4.5 Verification Procedure
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Replace generic description of a VVB in both sections with approved VVB by Proba
<b>Response</b>	We replaced a VVB or equivalent service provider that is working according to this set of rules, with an approved VVB by Proba

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.5 Verification Procedure
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Base the VVB rotation period more on market practice
<b>Response</b>	We updated the VVB rotation period to three years

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.5 Verification Procedure
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Clarify reasonable level of assurance
<b>Response</b>	We clarified this by adding a reference to ISO-14064-3



<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.6 Small-scale GHG Projects
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Clarify simplified VVB process
<b>Response</b>	We have made some small adjustments to clarify this process better.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.7 Audit requirements
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Overlap between Verification Procedure and Audit Requirements is confusing
<b>Response</b>	We have removed the duplicate section in the Audit Requirements section.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.7 Audit requirements
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Specify trusted datasource
<b>Response</b>	We have improved the definition of a trusted datasource in this section.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	4.9 VVB approval procedure
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Explain if rejected VVBs can re-apply again
<b>Response</b>	We have updated the process for rejected VVBs. VVBs can re-apply when they are confident they have resolved the reasons behind rejection.

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	5.5 Carbon Credit Lifecycle / 5.7 Uniqueness / 5.9 Carbon Credit Validity Period
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Recommendation to revisit organization of contents: avoid repetition
<b>Response</b>	Reorganized sections 5.5, 5.7 and 5.9 to remove repetition

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.1 internal review
<b>Section</b>	5.12 Proba Support
<b>Source of feedback</b>	PSAB review
<b>Feedback</b>	Add a starting point of the 7 years of support
<b>Response</b>	Support starting from the creation of Entitlements

<b>Document</b>	Proba Standard
<b>Document Version</b>	1.0
<b>Section</b>	3.2 Crediting Period
<b>Source of feedback</b>	Stakeholder feedback: VVB
<b>Feedback</b>	During the expert review of our Short rotation Paulownia tree cultivation methodology, we received feedback that the crediting period section in the Proba Standard was too vague.
<b>Response</b>	We have rewritten the crediting period section and added more guidelines to clarify the determination of the length of the crediting period.