

CR-I TOOL FOR DETERMINATION OF GHG REVERSAL RISK AND BUFFER CONTRIBUTION Ver 1.0

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Abbreviations

AFOLU: Agriculture, Forestry and Other Land Use

CS: Carbon Standard

CR-I: Carbon Registry-India

DE: Delegate Entity

DPD: Detailed Project Document

EP: External Project

GC: Governing Council

GHG: Greenhouse Gases

GTPS: Grand Total Possible Score

GTRR: Grand Total Risk Ranking

GTRS: Grand Total Risk Score

IFM: Improved Forest Management

IPP: Independent Project Proponent

MAP: Methodology Approval Procedure

MCU: Marketable Carbon Unit

MR: Monitoring Report

NCCF: Network for Certification and Conservation of Forests

RCS: Risk Category Score

RCR: Risk Category Ranking

RIP: Registration and Issuance Procedure

SCR: Stakeholder Consultation Report

TPS: Total Possible Score

VVB: Validation and Verification Body

VVS: Validation and Verification Standard

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Carbon Registry - India, Carving real impacts

1. Introduction

A critical requirement of the Carbon Registry-India (CR-I) (hereafter referred to as the registry) is that the net GHG removal enhancement and/or net avoided emissions generated by a project be permanent in nature. Permanence (as it is termed) of net GHG removal enhancement and/or avoided emissions is an essential aspect of environmental integrity and carbon mitigation projects. The issue of permanence is particularly relevant to AFOLU projects. As far as AFOLU projects are concerned, Permanence refers to the longevity of the net GHG removal enhancement and/or avoided emissions, and the long-term stability of the aggregate carbon stock. The net GHG removals enhancement and/or avoided emissions corresponding to AFOLU project might not be permanent and may result in release of GHG back into the atmosphere (GHG reversal) upon materialization of potential risk(s) (like extreme weather events, fires, insect infestation, political instability, etc.). Based on their source, the GHG reversals can be classified into two distinct classes, i.e., anthropogenic (or man-made) and natural, also known as intentional and unintentional GHG reversals respectively. Thus, it is essential for IPP(s) to determine the risk of non-permanence, both from anthropogenic and natural causes and adopt an appropriate approach to abate GHG reversals.

IPP(s) intending to register AFOLU projects on GHG removal enhancement and/or avoided emissions shall perform an evaluation of the aggregate risk (based on accumulation of all types of identified risks, relevant to the proposed project activity) of non-permanence for the proposed AFOLU project by using this tool, *i.e.*, the CR-I tool for Determination of GHG Reversal Risks and Buffer Pool Contribution (hereinafter referred to as the tool). Based on the tool, the IPP(s) shall quantify the risk percentage of the proposed project, termed as the Minimum Buffer Percentage (MBP), which shall be the amount of certified carbon units (MCUs) that must be deposited in the CR-I Buffer Pool Account to offset the risk of GHG reversals. NCCF shall be responsible for managing and executing the operational control over the CR-I Buffer Pool.

This tool shall be used in its entirety for projects belonging to sectoral scopes other than AFOLU, if considered necessary by the VVB and/or the NCCF GC.

2. Scope and Applicability

2.1 General Scope

2.1.1 The tool provides rules, requirements and procedures to the IPP(s) to calculate the risk associated with the GHG reversals and to subsequently determine the percentage of buffer pool contribution, known as MBP to the common buffer pool account, termed as CR-I Buffer Pool.

- 2.1.2 The tool provides rules, requirements and procedures to the VVB to evaluate the GHG reversal risks and MBP calculated by the IPP(s).
- 2.1.3 Rules, requirements and procedures established in this tool are additional to the rules and requirements established in Carbon Standard (CS), Validation and Verification Standard (VVS) and any other regulatory document, as applicable.

2.2 Sectoral Scope

- 2.2.1 The tool is applicable to AFOLU projects, *i.e.*, projects leading to net GHG removals enhancement or emissions reduction through activities such as conservation, reduction in annual cut, afforestation, agroforestry, soil management, IFM, land rejuvenation, land degradation management, *etc.*, falling under the sectoral scopes 14 (Afforestation and Reforestation) and 15 (Agriculture) as adopted by the registry from Clean Development Mechanism (CDM) of UNFCCC.
- 2.2.2 The tool shall be used in its entirety for any other projects if deemed necessary by VVB and/or NCCF GC.

2.3 Greenhouse Gases

2.3.1 The tool shall encompass six types of Greenhouse Gases (GHGs) namely, Carbon Dioxide (CO₂), Methane (CH₄), Nitrous Oxide (N₂O), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs) and Sulphur Hexa-Fluoride (SF₆) as mentioned in Subsection 4.3 of Carbon Standard.

2.4 Project Scale

2.4.1 The tool shall be applicable to projects of all the scales as defined in Section 9.5 of CS.

2.5 Geographical Scope and Delineation

- 2.5.1 The tool is applicable to projects proposed and registered located within the Indian Territory, or anywhere across the Globe.
- 2.5.2 Projects comprising patches of land, risk shall be assessed separately for each of the patches and then averaged to determine the overall GHG reversal risk.

2.6 Applicability

- 2.6.1 The tool is applicable for usage in the following stages:
 - i) Assessment of GHG reversal risk and buffer pool contribution by the IPP(s) during the design and development of the proposed project.
 - ii) Assessment of GHG reversal risk and buffer pool contribution by the IPP(s) during each monitoring period of the registered project.
 - iii) Validation of Assessment of GHG reversal risk and buffer pool contribution by the VVB during Validation of the proposed project.
 - iv) Verification of Assessment of GHG reversal risk and buffer pool contribution by the VVB during each Verification of the registered project.
 - v) Reporting of Actual GHG reversals by IPP(s) and Verification of actual GHG reversals by VVB.

3. Risk Assessment

3.1 General

- 3.1.1 IPP(s) shall identify non-permanence risk associated with the project based on the risk categories and risk types for the period of 100 years, with period commencing from the start date of the project, termed as Minimum Project Term and shall be based on information available for past, present and future scenarios and, supported by reports, scholarly articles, or any other reputable source of information. IPP(s) shall provide justification of the assessment of risk along with appropriate and adequate evidence, besides the description of actions taken to mitigate the identified risks.
- 3.1.2 In cases where a project comprises activities from different sectoral scopes, the risk and quantum of buffer pool contribution, *i.e.*, MBP shall be identified and determined only for the activities pertaining to sectoral scopes 14 and 15.
- 3.1.3 The risk percentage and subsequently MBP shall be determined based on the risk probability and impact of risk on the project and the mitigation measure proposed and/or taken by IPP(s), if any.
- 3.1.4 The risk shall be identified and evaluated based on the risk categories and risk types indicated in Table 1 (reference Subsection 3.2). If required, IPP(s) shall propose new risk type(s) relevant to the project and classified appropriately under risk category (ies).

3.2 Risk Identification and Categorization

- 3.2.1 IPP(s) shall identify and assess risk types as mentioned in each of the 5 risk categories in Table 1. Table 1 provides risk categories further broken into probable risk types along with suitable mitigation measures.
- 3.2.2 IPP(s) shall justify the risk assessed and the mitigation measures selected to mitigate the risks using appropriate evidence, citations and other reputable sources of information. IPP(s) shall also describe the mitigation measures adopted and their impact on identified and assessed risk types.

Table 1: Risk Categories and Risk Types

S. N.	Risk Category	Risk Type	Suitable Mitigation Measure
1.	Financial Risk: The financial risk refers to the risk associated with financial needs of project implementation and monitoring, which can arise due to various predicaments. Therefore, the project may not be able to generate requisite GHG removals enhancement and the IPP(s) is unable to continue monitoring and reporting. The IPP(s) is(are) required to provide documents related to the financial plan for the project.	a) Lack of funds, funding options or timely availability of funds b) Bankruptcy risks to IPP(s) c) Inability to secure buyers for MCUs d) Uncertainty in price of MCUs/lack of trading experience e) Long breakeven period	 Provide proof of sufficient funding for implementation of the proposed project Hedge investment, if required, by securing funding from external sources Ensure future contracts for sale of generated or to be generated MCUs Ensure alternate revenue generation streams
2.	Management Risk: The management risk refers to uncertainty in	a) Lack of internal expertise	External outsourcing of consultants/experts

inac or r tecl con exp	ject execution, dequate management reporting due to lack of hnical expertise, npetence and rerience in project nagement of the IPP(s).	c)	Insufficient number of expert and experienced team members Lack of proper tools and QA/QC measures Inadequate availability of quality planting material	•	Training of in-house team Hiring of new personnel Developing and following project execution plan In-house QA/QC team
The asp the that jeon impulti	e social risk refers to the ects of communities in vicinity of the project t might lead to pardizing of the project olementation and mately failure of GHG novals enhancement.	b)	Right of land Insufficient support of local and tribal communitie s associated with the area Change in land usage pattern		 Resource management, creating alternative sourcing of resources Extensive Local stakeholder consultations Capacity building exercises Demonstration of net positive impacts on community and resources on which
		d)	Improper harvesting, overgrazing, overdepend ence on resources, encroachme nt, etc		community is dependent
poli cha land imp GH enh be s	litical Risk: The itical risk refers to the inge in political dscape which might pact the project and G removals announcement. There could some risk under the egory, which might be		Change in land type Policy changes (external)-Change in resource allocation or		 Ensure legally binding rights to land Support of government as an IPP and/or Stakeholder

out of control of IPP(s) with no mitigation measures	managemen t. Examples: mining, deforestatio n notification, developmen t of roads/high ways on the project land, etc. c) Act of war	and/or buyer of generated MCUs.
5 Natural Risk: The risk associated with the natural events or natural forces on which there is no control of humans, would be considered as natural risk. This might lead to destruction of biomass and elimination of GHG removals. Extent of Natural Risk impact on the project shall be described and evaluated separately as well.	a) Drought b) Flood c) Infestation of pests, diseases and/or invasive species d) Natural forest fires e) Extreme weather events such as hurricanes, heat stress, etc	Implement project specific risk measure and/or intervention

3.3 Risk Analysis

Risk Scoring

3.3.1 For each risk type, IPP(s) shall give scoring for risk probability and risk impact based on the Risk Scoring Scale, with 5 being the highest possible score and 1 being the lowest possible score. Where, risk probability is the

chance of occurrence of the identified risk type and risk impact being scale and intensity of impact on GHG removals due to identified risk. IPP(s) shall provide justification for each score given, using appropriate citation such as reports, scholarly articles and other reputed sources of information. Risk scores should represent the maximum risk associated with the risk categories and types. Scores shall be determined for risk types before and after measures are put in place to mitigate the risk.

- 3.3.2 Risk Score of a risk type shall be calculated by multiplication of scores given to Risk Probability and Risk Impact, thus maximum possible score shall be 25 (5*5) for a risk type. IPP(s) shall provide risk scoring before and after risk mitigation measures that are being proposed (if any) for risk types. Score for a particular risk type shall not be 'o' (zero), before or after application of mitigation measures. However, in case a risk type is not applicable for the proposed project, in such a scenario IPP(s) shall mention 'N/A' for the risk type in relevant sections and provide appropriate and adequate justification for non-applicability of the risk type. IPP(s) shall also exclude such risk type from all further calculations.
- 3.3.3 Further IPP(s) shall calculate the Risk Category Score (RCS) by adding all the scores of the risk types (considering the mitigation measures) within the risk category as per the table provided in Annexure 1.

	5 (HIGH)	5	10	15	20	25
	4	4	8	12	16	20
X	3	3	6	9	12	15
ABIIT	2	2	4	6	8	10
RISK PROBABIITY	(LOW)	1	2	3	4	5
RISK	Score	1 (LOW)	2	3	4	5 (HIGH)
	RISK IMPACT					

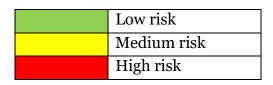


Figure 1: Risk Scoring Scale

Risk Ranking

- 3.3.4 After, all the relevant risk types have been scored; the IPP(s) shall provide a cumulative score of the risk category by adding the risk scores of all the applicable risk types. This score shall be known as Risk Category Score (RCS). Total Possible Score (TPS) for a category shall be 25 multiplied by the number of risk types. For Example, TPS for a category with 3 risk types shall be 25 X 3, *i.e.*, 75.
- 3.3.5 Risk Category Ranking (RCR) is determined by calculating the percentage of Risk Category Score (RCS) w.r.t. to Total Possible Score (TPS) i.e. $\frac{RCS}{TPS} \times 100$
- 3.3.6 The RCRs are classified as follows in Table 2 based on the percentage of Risk Category Score (RCS) to Total Possible Score (TPS)

Table 2: Risk Category Ranking

S.N.	Risk Category Ranking (RCR)	Percentage RCS Range
1.	Low Risk	<= 12%
2.	Medium Risk	>12%, <=40%
3.	High Risk	>40%

Note: the percentage shall not be rounded off.

3.3.7 The proposed project shall be deemed ineligible for registration with the registry if RCR of one or more risk category is ascertained as High Risk.

4. Determination of Contribution to Buffer Pool

4.1 Introduction

- 4.1.1 The buffer calculations would determine the percentage of MCUs for the common buffer pool account known as CR-I Buffer Pool. CR-I buffer pool shall hold MCUs contributed by IPP(s) in lieu of risk(s) associated with GHG reversals and/or avoided emissions in case of AFOLU Projects.
- 4.1.2 NCCF GC shall hold complete authority over control, function, operation and maintenance of CR-I buffer pool. MCUs contributed shall be deemed non-transferable and non-tradable under any circumstance and IPP(s) shall also not make any pre-purchase agreement for buffer MCUs.
- 4.1.3 The buffer MCUs shall be utilised to compensate the reversals of GHG removals due to risk associated with the project.

4.2 Calculating Buffer Contribution

4.2.1 Contribution to CR-I buffer pool depends upon the Grand Total Risk Ranking (GTRR) which itself depends upon the percentage of Grand Total Risk Score (GTRS) Percentage calculated using the following formula:

Grand Total Risk Score (GTRS) Percentage =
$$\frac{GTRS}{GTPS}$$
 x 100

- 4.2.2 GTRS shall be the sum of all RCS. Therefore, GTRS = RCS1 + RCS2 + RCS3 + RCS4 + RCS5 as also mentioned in Annexure 1.
- 4.2.3 Grand Total Possible Score (GTPS) is sum of TPS of all risk categories. It also represents the maximum risk score possible for the project seeking registration and issuance of MCUs with the registry.
- 4.2.4 GTRR corresponds to the ranking of risks associated with the project, *i.e.*, GHG Reversal risk for the project is Low (L), Medium (M) or High (H).
- 4.2.5 Table 3 represents the Grand Total Risk Ranking corresponding to percentage of Grand Total Risk Score and corresponding Minimum Buffer Percentage of MCUs which needs to be deposited in the CR-I Buffer Pool as a risk mitigation measure.

4.2.6 If Grand Total Risk Ranking is High (H), *i.e.*, the Minimum Buffer Percentage is more than 40% project shall be ineligible for registration with the registry.

Table 3: Ranking for Grand Total Risk Score and Minimum Buffer Percentage

Grand Total Risk Score (GTRS) Percentage	Grand Total Risk Ranking (GTRR) (L/M/H)	Minimum Buffer Percentage (MBP)
$\frac{GTRS}{GTPS} \times 100 \text{ is } \le 12\%$	L	12%
$\frac{GTRS}{GTPS}$ x 100 is >12% & =<15%	M	15%
$\frac{GTRS}{GTPS}$ x 100 is > 15% & =<20%	M	20%
$\frac{GTRS}{GTPS}$ x 100 is >20% & =<25%	M	25%
$\frac{GTRS}{GTPS}$ x 100 is >25% & =<30%	M	30%
$\frac{GTRS}{GTPS}$ x 100 is >30% & =<35%	M	35%
$\frac{GTRS}{GTPS}$ x 100 is >35% & =<40%	M	40%
$\frac{GTRS}{GTPS} \times 100 \text{ is } > 40\%$	Н	Project ineligible for Registration

4.3 Contribution to CR-I Buffer Pool

- 4.3.1 IPP(s) shall contribute, at every stage of issuance, MCUs corresponding to at least determined MBP. However, IPP(s) may choose to contribute more at any issuance stage of the project.
- 4.3.2 IPP(s) shall mention the choice of contribution of MCUs in any of the following or a combination thereof, with absolute value of MCUs defined in tCO₂e as per the MBP:
 - i) Buffer MCUs are contributed from generated and issued MCUs from the project

- ii) Buffer MCUs are contributed from MCUs from other projects; MCUs can be of any sectoral scope and vintage.
- IPP(s) shall explicitly mention in the MR, the option or combination chosen, and subsequently the part (both percentage and absolute number of buffer MCUs for the option chosen.
- 4.3.3 IPP(s) shall adhere to procedure as prescribed in Registration and Issuance Procedure (RIP) for contribution of MCUs from other projects.
- 4.3.4 IPP(s) may also choose to get the project insured and in an event of GHG reversals, MCUs could be bought from the compensation received from the insurance. In such a scenario, only MCUs exceeding the already contributed units to CR-I buffer pool shall be allowed.
- 4.3.5 In case of intentional/anthropogenic reversals, complete amount of GHG reversals can be compensated from MCUs bought from settlement received in lieu of the insurance.
- 4.3.6 Insurance shall not replace the CR-I buffer pool, instead only act as complementary risk mitigation measure.

5. Monitoring and Reporting of Reversals

5.1 Monitoring

- 5.1.1 IPP(s) shall describe the monitoring approach and strategy to monitor risk associated with the GHG reversals in the appropriate section of the DPD using the DPD template available on the registry website.
- 5.1.2 IPP(s) shall describe the approach and strategy to monitor the GHG reversals in the appropriate section of the DPD and MR using the DPD template and MR template respectively, available on the registry website.
- 5.1.3 In case where monitoring approach and strategy requires sampling, IPP(s) shall use and adhere to rules and requirements prescribed in the "Standard: Sampling and Surveys for CDM Project Activities and Programmes of Activities" and methodology or set of methodologies applied, as appropriate.

5.2 Reporting of Actual GHG Reversals

- 5.2.1 IPP(s) shall notify NCCF of GHG reversals within 15 days of becoming aware/informed of GHG reversals through an email on cri.project@nccf.in, along with a brief about the following:
 - i) Event(s) both natural and/or anthropogenic that have led to GHG reversal
 - ii) Actions taken (if any) to reduce the amount of GHG reversals (*e.g.*, actions in case of forest fires, disease and pest infestation, overgrazing, etc)
 - iii) Estimated amount of GHG reversals
 - IPP(s) shall also include the complete title of the registered project, including the unique reference number.
- 5.2.2 IPP(s) shall submit a report on GHG reversal prepared using GHG reversal template through the online interface using the GHG Reversal form within 45 days of notification to NCCF or report reversals along with the MR becoming due as per the defined monitoring period, whichever is earlier. The GHG reversal reported shall be independently verified by an empanelled VVB on the expenses of the IPP(s).
- 5.2.3 IPP(s) shall use the GHG Reversal template available *on* the registry website to report the reversals of GHG removal enhancement and/or avoided GHG emissions and shall adhere to the procedure for the purpose as provided in the RIP.
- 5.2.4 IPP(s) shall mention amount of GHG reversal in the GHG Reversal report. For a project that comprises multiple patches of land, and GHG Reversal occurs in more than one patch of land, IPP(s) shall mention GHG Reversal distinctly for each patch of land and project as a whole.
- 5.2.5 In case where sampling is required to calculate the amount of GHG reversal, IPP(s) shall use and adhere to rules and requirements prescribed in the "Standard: Sampling and Surveys for CDM Project Activities and Programmes of Activities" and methodology or set of methodologies applied, as appropriate.
- 5.2.6 In a monitoring period, where GHG reversal (in tCO2e) is 5% more than that estimated, the IPP(s) shall provide justification for the increased GHG reversals for that monitoring period.

6. Compensation of GHG Reversals

- 6.1 The registry shall compensate the loss of GHG removals through the MCUs being deposited by the IPP(s) in the CR-I Buffer Pool account.
- 6.2 The registry shall compensate up to 5% more MCUs than the MCUs deposited in lieu of buffer for risks associated with GHG reversals.
- 6.3 In a scenario where GHG reversals are more than 5% of the estimated quantity following a proper risk analysis, IPP(s) shall deposit the MCUs in excess of the buffer contribution, in the CR-I buffer pool within 45 days of approval of compensation of GHG reversals. MCUs deposited may be of any sectoral scope and vintage.
- 6.4 If the IPP(s) fails to deposit the MCUs in excess of the IPP(s) contribution for the GHG reversals in the stipulated time, its account with the registry may be suspended or terminated, as decided on case to case basis.
- 6.5 In a scenario where no cases of GHG Reversals occur, CR-I shall hold the buffers in the buffer pool account for 100 years *i.e.* from the start date of the project to remainder of the Minimum Project Term of the registered project following which the registry shall cancel the MCUs equal to the MBP deposited by the IPP(s). If the IPP(s) has(ve) contributed more MCUs into the CR-I Buffer Pool than the Minimum Buffer Percentage required for the project during one or more stages of issuance, the registry shall credit the excess MCUs to the IPP's account.

7. Validation and Verification

7.1 General

- 7.1.1 VVB shall adhere to rules, requirements and procedures established in the tool for validation and verification activities associated with the application of the tool.
- 7.1.2 Rules, requirements and procedures of validation and verification established in the tool are additional to rules and requirements established in the Carbon Standard and the Validation and Verification Standard and any other document as applicable.

- 7.1.3 VVB shall use Standard Auditing Techniques at its disposal as described in Section 11 of VVS for impartial evaluation of activities as per the tool.
- 7.1.4 Whenever deemed necessary, VVB may engage with subject matter expert(s) for independent and impartial evaluation of application of the tool at relevant stages.
- 7.2 In case where sampling is required to be used to calculate the amount of GHG reversal, VVB shall use and adhere to rules and requirements prescribed in "Standard: Sampling and surveys for CDM project activities and programmes of activities".

7.3 Validation

- 7.3.1 VVB shall evaluate the risk probability and risk impact calculated by the IPP(s) for Minimum Project Term based on the rules, requirement and procedures established in Section 3 of the tool.
- 7.3.2 VVB shall validate the monitoring approach and strategy for monitoring of risk and GHG reversals in accordance with the rules, requirements and guidelines established in the registry.
- 7.3.3 VVB using its sectoral expertise and standard auditing techniques shall provide its assessment and conclusion of GHG reversal risk and MBP in the validation report.

7.4 Permanent Design Changes

7.4.1 In a scenario wherein Permanent Design Changes (PDC) are being proposed, VVB shall, as appropriate, evaluate the GHG reversal risk ensuing as a result of the proposed PDCs.

7.5 Verification of GHG Reversal Risks and Buffer Contribution

7.5.1 Risk analysis and buffer contribution shall be evaluated by an empaneled VVB at each verification, based on the rules, requirements and procedures established in the tool, CS, VVS and any other regulatory document, as applicable.

7.5.2 VVB using its sectoral expertise and standard auditing techniques shall provide its assessment and conclusion of GHG reversal risk and MBP in the verification report.

7.6 Verification of Actual GHG Reversals

- 7.6.1 In case of GHG reversals, VVB shall evaluate occurrence and extent of GHG reversals within 120 days of submission of GHG reversal report by the IPP, or along verification of monitoring of project, whichever is earlier.
- 7.6.2 VVB shall completely adhere to the rules, requirements and procedures established in the tool, CS, VVS and any other regulatory document applicable.
- 7.6.3 VVB shall prepare a GHG Reversal VeR using the GHG Reversal VeR template available on the registry website and shall completely adhere to document preparation instructions provided therein. VVB shall provide its assessment and conclusion in the GHG Reversal VeR
- 7.6.4 If deemed necessary by VVB and/or NCCF GC, reporting of GHG reversals shall be re-verified along with the monitoring report and other relevant documents by the VVB during the subsequent verification in that monitoring period.

Annexure 1: Calculation of GTRS

S. No.	Risk Category	Risk Type	Risk Probability Score (A) {before Mitigation Measures}	Risk Impact (B) {Before Mitigation Measures}	Total Risk Type Score (A*B)	Mitigation Measures, if any	Risk Probability Score – After Mitigation Measure (Ai)	Risk Impact Score – After Mitigatio n Measure (Bi)	Total Risk Type Score – After Mitigatio n Measure (Ai*Bi)	Risk Category Score (sum of all risk types) {RCS}	Risk Cate- gory Ranking (Low, Medium or High)
1.	Financial Risk	Type 1									
		Type 2									
		Type 3									
2.	Management Risk	Type 1									
		Type 2									
3.	Social Risk	Type 1									
		Type 2									
4.	Political Risk	Type 1									
		Type 2									
5.	Natural Risk	Type 1									
		Type 2									
		Type 3									
		GRAN	D TOTAL RISK				S4 + RCS5				
				GRAND T	TOTAL RISK F	RANKING					

Document History

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