

# **ENDORSEMENT OF VVBs AND CBs**

**Third party validation,  
verification or certification**



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# Endorsement Requirements of VVBs and CBs

Carbon Standards International (CSI) is a standard owner and guarantees a robust third-party validation, verification and certification.

This document describes the requirements for Certification Bodies (CBs) and Validation and Verification Bodies (VVBs) to become eligible and to maintain eligibility to conduct certifications based on Carbon Standard product standards and validations, verifications based on the Carbon Standard C-Sink methodologies and standards.

The endorsed VVB/CB will be published on the website of CSI. The VVB / CB shall offer services to operators only within the defined scope and only as long as their approval is valid.

## 1. Application and Endorsement Process

Application to CSI shall be submitted in English and all documents related to the validation/verification and inspection/certification process should be available in English as well as the language of CSI is English.

All CBs / VVBs must formally apply for approval to CSI using the designated application procedures (section 2&3). Each application undergoes a completeness review (section 4), followed by a desk review (section 5) by CSI experts, with decisions taken by CSI Quality Management (section 6). Upon approval, CSI issues a formal endorsement certificate and contract (section 6). CBs and VVBs must maintain this approval by successfully passing annual audits conducted by CSI to confirm ongoing compliance with standards and operational requirements (section 7). CSI ensures that the CBs and VVBs are independent and free from Conflicts of Interest (COI).

First Contact	<ul style="list-style-type: none"> <li>An interested CB / VVB gets in touch with Carbon Standards International through the contact possibilities on the website</li> <li>First call - The responsible person from the CB / VVB and the QM from CSI hold a first call where the QM Manager explains the requirements for approval /endorsement.</li> </ul>
Submission of application	<ul style="list-style-type: none"> <li>If the CB / VVB considers itself as ready for the approval process all necessary documentation, and certificates of accreditation will be sent to Carbon Standards International with a brief explanation why the CB / VVB would like to apply.</li> <li>CSI confirms the acceptance of the application as soon as all the necessary documents are available.</li> <li>Application Form = 4000010EN</li> </ul>
Completeness check and request for missing documentation	<ul style="list-style-type: none"> <li>QM of CSI together with the technical personnel proves whether all requirements of this document are met.</li> <li>The QM of CSI appoints open questions and requests missing documentation from the CB / VVB.</li> <li>Non-conformities are reported in written form to the CB / VVB</li> </ul>
Desk review /Audit	<ul style="list-style-type: none"> <li>As a last step of the approval process an audit at the organisations head office will take place in order to audit the processes documented.</li> <li>Non-conformities are reported in written form to the CB / VVB</li> </ul>
Decision on Approval / Contract	<ul style="list-style-type: none"> <li>Once all relevant non-conformities were cleared a letter of approval/endorsement will be sent to the CB / VVB</li> <li>A contract between CSI and the CB / VVB will be signed.</li> <li>The endorsed CB/VVB will be published on the CSI Website.</li> </ul>
Monitoring/Re-approval	<ul style="list-style-type: none"> <li>Audits: check the performance of the CBs/VVBs. There will be a feedback mechanism about the performance of the CBs to the Accreditation Bodies.</li> <li>Re-approval audits will take place on a regular basis (1-2 years)</li> </ul>
Modification, suspension or revocation	<ul style="list-style-type: none"> <li>CSI might review, modify, suspend or revoke the approval of the VVB/CB at any time if the full compliance with the requirements in this document is in question.</li> </ul>

## **2. First Contact**

An interested CB / VVB gets in touch with Carbon Standards International through the contact possibilities on the website. The person responsible at the CB / VVB and the QM Manager from CSI hold a first call where the QM Manager explains the process and requirements for approval /endorsement. As a follow-up of the first call the CSI QM Manager sends the requirements and checklists used for the approval process to the interested VVB/CB. The interested VVB/CB proposes a date of submission of the application.

## **3. Submission of Application**

If the CB / VVB considers itself as ready for the approval process all necessary documentation, and certificates of accreditation and further prove of fulfillment of the requirements will be sent to Carbon Standards International with a brief explanation why the CB / VVB would like to apply and accompanied by the official application form: 4000010EN

CSI confirms the receipt of the application and starts with the completeness check.

## **4. Completeness check and request for missing documents**

The QM Manager of CSI evaluates whether for all requirements stated in this document some kind of documentation that proofs the compliance was handed in. If some evidence is missing CSI will communicate this in a non-conformity report and ask for further submission.

### **4.1 Required documentation**

A detailed checklist for required documents is provided within the application form 4000010EN.

Additional evidence should be submitted regarding the following topics.

- A VVB/CB shall be an entity registered under applicable national or international law and comply with the legal requirements in the countries in which it operates.
- The VVB/CB shall in line with ISO 17065 4.2 and 17029 submit its process description on the management of impartiality to CSI. The VVB/CB shall in line with ISO 17065 4.6 and 17029 submit the price list related to CSI standard
- As part of the application, CBs / VVBs must declare any conflicts of interest as defined in more detail in the Application Template of CSI. This includes that the personnel of VVB /CB or any of their family members are dealing in, promoting, or otherwise have a fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated. This mechanism allows CSI to identify any conflicts of interest, and mitigate them if possible, or select another CB / VVB. The conflict of interest declaration should include:
  - Any organization which has been involved in the development of a particular project or has been paid to assist in protocol development may not act as a CB / VVB for that project.

- Upon signature of the statement of work for an individual project, the CB / VVB must confirm a declaration ensuring impartiality and no other conflicts of interest.
- The personnel has to maintain impartiality and has to be free from conflicts of interest.

## **4.2 Required accreditation**

If a VVB/CB loses one of the below mentioned accreditations, the approval for CSI standards will be discontinued immediately. It is the responsibility of the VVB/CB to inform CSI about changes in the accreditation status and the reasons for it.

### **4.2.1 Required accreditation for CBs**

CBs must be able to demonstrate accreditation from an International Accreditation Body according

- Audits must follow ISO 19011 auditing guidelines.
- Approval is immediately withdrawn if a CB loses any of the required accreditations.
- CSI can report poor CBs performance to the relevant accreditation body.

### **4.2.2 Required accreditation for VVBs**

VVBs must be able to demonstrate accreditation from an International Accreditation Body according

- ISO 14065 for greenhouse gas validation and verification or other relevant ISO standard, including but not limited to ISO 17029 accreditation for GHG activities and
- Projects must be verified to a reasonable level of assurance as defined in ISO 14064 and
- ISO 14066 for competence requirements of GHG validation/verification teams or
- UNFCCC accreditation under the Kyoto Protocol, Paris Agreement, or an equivalent scheme or
- a relevant governmental or intergovernmental regulatory body.

The VVBs may only perform validation and/or verification activities for the sectoral scope for which they have been accredited.

## **4.3 Required resources and personnel**

The VVB/CB shall employ or have access to a sufficient number of personnel to cover its operations related to CSI standards. VVBs must ensure all validators and verifiers meet ISO 17029/14066 and the personnel of CBs have to fulfil requirements of ISO 17065. The VVB/CB shall follow the requirements regarding topics such as impartiality, confidentiality, competence and performance management and record keeping of the personnel etc. described in these ISO Norms (see section 3.2).

The VVB must ensure the competence of its personnel and teams involved in the certification, validation or verification process. This includes:

- Having documented recruiting process for selecting competent team members.
- Files of all involved personnel have to be present, including, but not limited to a curriculum vitae, education, work experience, signed conflict of interest, trainings and evaluation/monitoring
- Demonstrating that personnel have the required education, training, skills, and experience.
- Maintaining records of qualifications and competence.
- Monitoring and measuring the performance of all persons involved
- Identifying special training needs

Verification/validation and inspection/certification personnel, irrespective of whether they are internal or external resources, shall be under the responsibility of the VVB/CB management.

If VVB/CB would like to outsource tasks to a third party, first CSI has to be informed about it and has to approve it. VVB/CB in this case has to ensure that the subcontracted entity does not further outsource this function.

#### **4.3.1 Required personnel skills / Team composition of VVBs**

- The VVB shall have a team leader with the following skills:
  - Proven competence in leading verification activities:
  - Strong understanding of the scope, processes, and reporting requirements.
  - Skills in communication, conflict resolution, and decision-making.
  - Assessing the adequacy of team resources and assignments, evaluating and forming a final verification opinion.
- The VVB shall have at least one approved auditor and one validator/ verifier with the relevant competence.
- The VVB must ensure that the verification team includes personnel with knowledge in:
  - Relevant experience in risk auditing, experience and competence in conducting greenhouse gas (GHG) accounting, GHG data verification, reporting, and corrective action follow-up.
  - GHG sources and sinks
  - GHG quantification methodologies according to CSI methodologies
  - GHG reporting frameworks and
  - Relevant sector-specific knowledge
  - Knowledge of regulatory and voluntary GHG schemes
  - Audit and assessment techniques
- In addition to the personnel requirements of ISO 17066 the personnel has to fulfill for CSI standards:
  - Demonstrable knowledge of CSI standards.
  - Knowledge in environmental and technical regulations.
  - Competence in auditing principles per ISO 19011.
  - No more than six consecutive audits of the same client by the same auditor
- The team must collectively have the necessary expertise, even if no single person possesses it.
- An audit team shall, at a minimum, include a team leader and a separate verifier.
  - The audit team must possess the requisite expertise, encompassing knowledge in all relevant CSI standards and requirements, as well as other associated documents as related to the pathways for which they are to conduct an audit and verification.

- The VVB shall demonstrate competence in the sectoral areas relevant to the project's carbon removal activities; in addition, Program-Specific Knowledge, audit and verification skills like evidence collection and analysis, drawing logical and evidence-based conclusions, sector and client understanding.
- Additional requirements for organizational-level audit and verification, familiarity with methodologies, procedures, and criteria of the applicable CSI standard.

#### **4.3.2 Required personnel skills / Team composition of CBs**

Certification Bodies must appoint audit teams according to EN ISO/IEC 19011, ensuring appropriate competence for each audit.

For all approved scopes the CB shall have at least one approved auditor and at least one approved certifier with the relevant competence. At least a four-eye principle shall be implemented for auditing and certification of CSI standards.

Auditors must:

- Be independent from the activity being audited.
- Have no conflicts of interest (e.g. consultancy services with the same client within the last three years).
- Possess at least two years' experience in the respective area of the standard.
- Hold additional technical qualifications relevant to the audit scope (e.g. agriculture, forestry, energy).
- Have group audit experience when applicable.
- Have knowledge and experience of the applicable CSI standard and related documents
- Have relevant language skills to communicate with the operator or use an independent translator.
- Have regional experience and knowledge about the applicable rules and laws (especially concerning environmental and socio-economic matters) of the country of the operator
- Have technical understanding and experience related to the relevant standard
- Have Experience in auditing techniques and the ability to apply appropriate inspection principles, procedures and techniques
- Have the ability to verify the accuracy of collected information and be aware of the significance and appropriateness of evidence.
- Have the ability to understand the content of the appropriate standard and apply this knowledge during the inspection.
- Have the ability to prepare inspection reports in high quality
- Auditors shall inspect the same client for a maximum of 6 consecutive years. The inspector must wait at least 1 inspection before he/she conducts the next inspection at the same client again.

Certifiers must have knowledge in:

- the evaluation of data and system auditing techniques and methodologies;
- risk assessment techniques and methodologies;
- in Data and information sampling techniques and methodologies;
- the application of the concepts of materiality and level of assurance;
- Collecting information through observing and reviewing documents, records and data;
- Verification of the accuracy of collected information, evaluation of the sufficiency and appropriateness of gathered evidence to support findings and conclusions.

- Preparation of certification reports.

### **4.3.3 Training**

All employees active in the certification, validation or verification process must participate in all mandatory trainings provided by CSI or its selected partner organizations before being approved. They must participate in the yearly further trainings provided by CSI. The VVB/CB will be notified whenever such trainings are available. In order to maintain the CSI approval status for the respective employees the proofs of the trainings and successful completion of the tests (at least 70% score) needs to be shown. If they score less than 70% the training needs to be repeated. There is a maximum of 3 attempts only. If a participant fails to pass the exam after 3 attempts, the VVB/CB shall contact CSI to agree on a training action plan for these individuals.

## **4.4 Required client relationships**

VVB/CB shall have a written legally binding agreement for provision of verification/validation and certification activities with its clients. Prior to entering into a contract, VVB/CB shall check on the Easy-Cert website that the applicant is not already certified/validated/verified based on the standards of CSI. If the operator is already certified/validated/verified by another VVB/CB a transfer of validation/verification or inspection/certification related documents shall be initiated by the operator at the new VVB/CB because an operator cannot be certified/verified/validated by two VVB/CB at the same time. Where subunits apply for a certificate/verification/validation, VVB/CB shall sign a separate contract with the legal entities.

Operators shall be treated equally, no matter which approved CB / VVB they choose. The rules of equality and impartiality apply also to certification and validation/verification as described in the ISO standards. All CBS / VVBs must use the IT-systems that are available by CSI.

Double issuance of credits is not allowed, hence it needs to be checked by the VVB / CB.

## **5. Desk review / audit**

Once the completeness check of the application is finished and the VVB/CB could proof to fulfil all requirements mentioned. A desk review and audit will be scheduled.

The desk review will focus on the following requirements:

- Review details in documents that were handed in with the application.
- All VVB/CB shall maintain a quality management system for ensuring consistent implementation and compliance with the requirements of CSI and its standards including the annexes of the standards. Double issuance of credits is not allowed, hence needs to be checked by VVB/CB.
- In case of changes in the standard or requirements of CSI the QM system shall be updated and an internal audit shall be performed to ensure the proper implementation of the changes.

As a last step of the approval process an audit at the organizations head office will take place in order to audit the processes documented.

A non-conformity report is sent to the applicant.

## **6. Decision on approval / contract**

Once all relevant non-conformities from desk review and audit were cleared a letter of approval/endorsement will be sent to the CB / VVB. All requirements have to be fulfilled. All approved VVB/CB comply with the requirements in this document. It is the sole decision of CSI to approve, suspend or cancel the approval status of any VVB/CB.

Additional steps:

- All VVB/CB shall sign a contract with CSI before starting to work as an approved body.
- The endorsed CB/VVB will be published on the CSI Website.
- Validity: The approval of CBs /VVBs has no fixed end date. CSI conducts annual audits to verify ongoing compliance.

## **7. Monitoring and Re-approval**

The VVB/CB shall perform at least once a year an internal audit on the processes related to CSI standards to make sure that those are followed. Additionally witness audits and certification evaluations shall be conducted on a regular basis.

CSI actively monitors the performance of the VVBs and CBs by conducting regular audits. Re-approval audits will take place on a regular basis (1-2 years). VVBs / CBs must grant CSI and its representatives full access to operator records and facilities. Performance is evaluated through internal audits, corrective actions, and direct observation of verification work. There will be a feedback mechanism from CSI about the performance of the VVBs/CBs, non-conformities and root cause analysis shall be documented and corrective actions followed up in due time by the VVBs/CBs. In addition CBs are supervised by other bodies (e.g. Member States, the European Commission). Certification schemes mandate full cooperation for audits, investigations, and information requests. In multi-national operations, Member States may appoint a lead supervisory body to coordinate oversight activities. There will be a feedback mechanism about the performance of the CBs and VVBs to the Accreditation Bodies.

CSI actively monitors the performance of the individual employees involved in the certification, validation or verification process by reviewing the performance on yearly audits of the VVB/CB including the possibility of witness audits of the auditors. The VVBs / CBs have to ensure continued competence through ongoing training and evaluation. Procedures at CSI are in place to ensure VVBs / CBs are regularly audited and reviewed, and a process for managing VVB / CB performance, including provisions for corrective actions when necessary. Serious or repeated problems with the VVB/CB might lead to the withdrawal of the approval of an individual employee or the entire VVB/CB.

CBs / VVBs must verify the proper use of CSI trademarks and labels. Any misuse of trademarks/labels or premature product claims must be reported to CSI. CSI checks the use of trademarks during re-approval audits.

## **8. Modification, suspension or revocation of VVB/CB approval**

CSI might review, modify, suspend or revoke the approval of the VVB/CB at any time if the full compliance with these requirements are in question. During suspension or

revocation, the VVB/CB may not continue to provide services to clients based on CSI standards or sign new contracts to conduct inspections or verifications. Within one month of suspension or revocation of the approval VVB/CB must inform the verified operations with a valid certificate that the VVB/CB has been suspended, their certification, validation or verification status will remain valid. The validity of certificates, validation statements and attestations issued prior to the date of suspension of the VVB/CB is not affected unless CSI will decide otherwise.

An approved VVB/CB may request to voluntarily withdraw its approval for certain scope or as a whole or cancel its contract with CSI in writing. In this case the certificates, validation statements and attestations of the operators will remain valid until further notice. It is the responsibility of the VVB/CB to inform the clients of the withdrawal and inform them how they can maintain their certification, validation and verification status.

## 9. Deadlines for certification and verification

The following table shows the deadlines in which the verification/certification work must be completed. The starting point is the moment when the validator/certifier receives the corrective actions submitted by the client. The deadline for validator/certification describes the period until the validation/certification must be done and closed. If the client should submit further documents or information, this period starts again after they have submitted the documents. Deadlines mentioned below must be kept at all times.

Type	Starting point	Deadline for verification/certification decision
Closing onsite audit	The client submitted the corrective actions and i.e. results of analysis or if no non-conformities (NCs) have been issued the date of signing the verification/audit report.	10 working days
Online certification/verification orders	If an online certification/verification (e.g. batch certification) is needed. The order is submitted by the client in IT-tools with all necessary and accurate information	within 2 working days

## 10. Handling

VVBs /CBs must operate fair, transparent, and independent complaint and appeal management systems aligned with ISO 17029/14065. This includes clear procedures for receiving, evaluating, and resolving disputes.

VVBs are required to create and document the appeals process to receive, handle, assess, and investigate complaints, and implement necessary corrections and corrective measures.

## **11. Use of IT tools and Reporting Requirements for CBs / VVBs**

VVBs /CBs are required to use CSI's proprietary software tools when available and ensure timely, accurate, and English-language reporting of validation and verification data. Both the statements and reports of validation and verification will, subject to commercial confidentiality constraints (e.g. redactions may be necessary on sensitive information), be published on the website.

VVBs /CBs must use the CSI IT tools and appropriate systems for reporting.