

Application of the Oeko-Institut/WWF-US/ EDF methodology for assessing the quality of carbon credits

This document presents results from the application of version 3.0 of a methodology, developed by Oeko-Institut, World Wildlife Fund (WWF-US) and Environmental Defense Fund (EDF), for assessing the quality of carbon credits. The methodology is applied by Oeko-Institut with support by Carbon Limits, Greenhouse Gas Management Institute (GHGMI), INFRAS, Stockholm Environment Institute, and individual carbon market experts. This document evaluates one specific criterion or sub-criterion with respect to a specific carbon crediting program, project type, quantification methodology and/or host country, as specified in the below table. Please note that the CCQI website <u>Site terms and Privacy Policy</u> apply with respect to any use of the information provided in this document. Further information on the project and the methodology can be found here: <u>www.carboncreditquality.org</u>

Criterion:	5.3 Robust third-party auditing	C ir
Carbon crediting program:	Climate Action Reserve (CAR)	W
Assessment based on carbon crediting program documents valid as of:	30 June 2021	Н Р 7
Date of final assessment:	20 May 2022	S N
Score:	4.23	7 P

Contact nfo@oeko.de www.oeko.de

Head Office Freiburg P. O. Box 17 71 79017 Freiburg

Street address Merzhauser Straße 173 79100 Freiburg Phone +49 761 45295-0

Office Berlin Borkumstraße 2 13189 Berlin Phone +49 30 405085-0

Office Darmstadt Rheinstraße 95 64295 Darmstadt Phone +49 6151 8191-0

Assessment

Indicator 5.3.1

Relevant scoring methodology provisions

"The program requires that accredited third-party validation and verification entities assess the adherence of a project against all program provisions, including whether the design of the activity and the determination of emission reductions or removals conforms with all program provisions. This auditing must take place prior to the issuance of carbon credits."

Information sources considered

- Reserve Offset Program Manual, 12 March 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> <u>content/uploads/2021/03/Reserve Offset Program Manual March 2021.pdf</u>.
- 2 Climate Action Reserve Verification Program Manual, 3 February 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> content/uploads/2021/02/Verification Program Manual February 2021.pdf.
- 3 Program website: Verification Body Requirements <u>https://www.climateactionreserve.org/how/verification/how-to-become-a-verifier/</u>, last accessed on 24 June 2021.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 3.4.1, page 30: "Validation involves determining the project methodology and a project's eligibility to generate GHG reductions or removals. Unlike some other offset programs, the Reserve does not require that validation be conducted. Eligibility criteria and methodologies for emission reduction calculations are built into the Reserve protocols. Because the Reserve's eligibility criteria are mostly standardized, determination of eligibility is usually straightforward and requires minimal interpretative judgment by verification bodies. The first time a project is verified, verification bodies are required to affirm the project's eligibility according to the rules defined in the relevant protocol. Project developers may choose to have a project verified without verifying CRTs for issuance in order to establish its eligibility for registration and provide more certainty to potential CRT buyers or sellers. However, when a project developer is seeking to register CRTs, a full verification must be conducted."
- Provision 2 Source 2, section 1, page 1: "The Reserve requires third-party verification of all GHG projects as specified in each protocol. CRTs are issued only after a Verification Report and a Verification Statement attesting to the accuracy of reported emission reductions have been submitted by the verification body and accepted by the Reserve. The Reserve relies upon these documents to attest to the legitimacy of the CRTs issued. The verification body is held accountable to the Reserve for the quality and independence of the report and statement submitted to the Reserve."

- Provision 3 Source 2, section 3.2, page 10: "Verification bodies and verifiers must follow all applicable Reserve program rules and adhere to the guidance laid out in the Reserve protocols and program manuals when performing verification activities. In addition, a verification body and its verifiers must always demonstrate ethical conduct and competence, exercise due professional care, and adhere to the remaining verification principles throughout the verification process."
- Provision 4 Source 3: "The Climate Action Reserve has partnered with the American National Standards Institute (ANSI) to accredit independent third party Verification Bodies under ISO14065:2007, ISO 14064-3:2006, and the International Accreditation Forum, Inc. (IAF) MD 6:2009 for specific project sector groupings in accordance with ANSI Scoping Policy <u>GHG-PR-706</u>. This coordinated effort streamlines the accreditation process for Verification Bodies in North America and creates consistency with international practice.

Only Verification Bodies currently accredited or enrolled in the ANSI accreditation program may provide verification services to Reserve project developers. The Reserve no longer accredits Verification Bodies. ANSI is currently accepting applications for the GHG accreditation program."

Assessment outcome

Yes (3 Points).

Justification of assessment

The above documentation indicates that the indicator is fulfilled. While a separate validation process is not required under the reserve, the first verification serves the same purpose by confirming the project's eligibility under CAR rules prior to credit issuance (Provision 1). Third party auditing is required prior to credit issuance for all projects (Provision 2), verification must follow all program rules and guidelines and ensure the project's compliance (Provision 3), and Third-party verifiers must be accredited (Provision 4).

Indicator 5.3.2

Relevant scoring methodology provisions

"Validation and verification entities are accredited by an International Accreditation Forum (IAF) member body or the CDM Executive Board (EB). The eligibility requirements of third-party validation and verification entities should be available on the program's website."

Information sources considered

- Program website: Verification Body Requirements (<u>https://www.climateactionreserve.org/how/verification/how-to-become-a-verifier/</u>), last accessed on 24 June 2021.
- 2 Program website: Connect with a Verification Body (<u>https://www.climateactionreserve.org/how/verification/connect-with-a-verification-body/</u>) last accessed 13 January 2022.

Relevant carbon crediting program provisions

Provision 1 Source 1: "The Climate Action Reserve has partnered with the American National Standards Institute (ANSI) to accredit independent third party Verification Bodies under ISO14065:2007, ISO 14064-3:2006, and the International Accreditation Forum, Inc. (IAF) MD 6:2009 for specific project sector groupings in accordance with ANSI Scoping Policy <u>GHG-PR-706</u>. This coordinated effort streamlines the accreditation process for Verification Bodies in North America and creates consistency with international practice.

Only Verification Bodies currently accredited or enrolled in the ANSI accreditation program may provide verification services to Reserve project developers. The Reserve no longer accredits Verification Bodies. ANSI is currently accepting applications for the GHG accreditation program."

Provision 2 Source 2: "The verification bodies listed below are accredited by the ANSI National Accreditation Board (ANAB) and qualified to provide verification services for voluntary and early action projects under the Reserve's program. Once a verification body has both completed the training requirements AND achieved its ISO 14065: 2007, ISO 14064-3: 2006, and IAF MD 6: 2009 accreditation, it may advertise that it is "recognized and qualified as a verification body for the Climate Action Reserve." The list of ANAB-accredited Verification Bodies is available on ANAB's website."

Assessment outcome

Yes (1 Point).

Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled. Third-party auditors are listed and the list is available on the program website.

Indicator 5.3.3

Relevant scoring methodology provisions

"The program has in place standards, procedures or guidance that validation and verification entities must comply with in performing their auditing functions (e.g., validation and verification standards and procedures, audit manuals) to ensure consistent auditing practices under the program."

Information sources considered

- 1 Reserve Offset Program Manual, 12 March 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> <u>content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf</u>.
- 2 Climate Action Reserve Verification Program Manual, February 3 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> <u>content/uploads/2021/02/Verification_Program_Manual_February_2021.pdf</u>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 3.2, page 22: "This manual contains details on the Reserve's program, policies, and requirements. Users of the Reserve program, including verification bodies, are subject to the requirements and guidance specified in the most recent version of the Reserve Offset Program Manual. The Reserve Offset Program Manual is considered effective as of the date it is posted on the Reserve website. All account holders and verification bodies are notified when an update to the Reserve Offset Program Manual is released, and the manual is available on the Reserve's Program Manuals and Policies webpage at http://www.climateactionreserve.org/how/program/program-manual/."
- Provision 2 Source 2, section 1, page 1: "The Climate Action Reserve (Reserve) created this Verification Program Manual to detail the requirements of its verification program and provide approved verification bodies with a standardized approach to the independent and rigorous verification of GHG emissions reductions and removals reported by project developers into its offset program. Project developers should also use this document to help prepare them for the reporting and verification process.

This standardized approach to verification promotes the relevance, completeness, consistency, accuracy, transparency, and conservativeness of emissions reductions data reported in the Reserve. This is an accompanying document to the Reserve Offset Program Manual, which presents the Reserve's policies, processes, and procedures for registering projects and generating offset credits with the Reserve."

Assessment outcome

Yes (1 Point).

Justification of assessment

Verification bodies are required to follow guidelines set forth in the Reserve Offset Program Manual and Verification Program Manual, as well as rules and procedures described in the specific verification guidance that is included in each protocol. The indicator is fulfilled.

Indicator 5.3.4

Relevant scoring methodology provisions

"The validation and verification entities' auditing functions extend to the review of stakeholder consultations by evaluating whether public comments have been duly considered by the project."

Information sources considered

1 Reserve Offset Program Manual, 12 March 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> <u>content/uploads/2021/03/Reserve_Offset_Program_Manual_March_2021.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.2.5, page 45: "4.2.5 Board Approval

The Reserve's Board of Directors must vote to adopt each protocol. Protocols are presented at quarterly board meetings, which are open to the public, and issues raised throughout the development process are reviewed, giving workgroup members and interested stakeholders a chance to raise any last concerns or questions. After the Board adopts the protocol, it becomes an official Reserve protocol and is immediately available for use."

Provision 2 Source 1, section 4.2.6, page 45: "4.2.6 Ongoing Public Feedback and Comments

After Board approval, the Reserve continues to solicit, document, and respond to public feedback and comments on the current version of the protocol. Comments and feedback on adopted protocols can be submitted to the Reserve at policy@climateactionreserve.org. The public is also welcome to contact Reserve staff directly to discuss their comments and concerns. Public feedback and comments are assessed on an ongoing basis and may initiate a revision to a protocol."

Assessment outcome

No (0 Points).

Justification of assessment

Given CARs standardized approach to crediting, issues with individual projects may be handled at the protocol level instead of the individual project level. As shown in Provisions 1 and 2, there are channels available for any issues or complaints to be raised and for those complaints to result in revisions to the protocols that would ostensibly resolve the issues. However, there is no requirement for auditors to review issues or complaints from public stakeholders' comments that may be relevant to the project for which they are conducting 3rd party review.

Indicator 5.3.5

Relevant scoring methodology provisions

"The program has in place provisions which restrict a project owner's use of the same validation and verification entity. These restrictions, sometimes referred to as "rotation" provisions, may limit the frequency of audits (e.g., if an auditor provided the initial verification, then that auditor may not provide the subsequent verification), the total number of audits (e.g., an auditor must perform verification for six consecutive years of the project, thereafter another auditor must perform verification), or the types of audits which may be performed by the same entity for the same project (e.g., if an auditor performed the validation, another auditor must perform verification). Programs may provide exceptions to such provisions as long as such exceptions are only granted in circumstances specified by the program. For example, geographic scarcity of auditors may necessitate the use of the same auditor for multiple verifications."

Information sources considered

1 Climate Action Reserve Verification Program Manual, 3 February 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> <u>content/uploads/2021/02/Verification_Program_Manual_February_2021.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3.7, page 23-24: "There is no limit on the number of projects that a verification body may work on for a project developer. However, if the verification body has performed verification activities for more than 10 projects over a 12-month period for a single project developer¹⁰ [Footnote: Cooperatives and aggregates will be viewed as a singular verification effort for the sake of this evaluation, rather than counting each cooperative or aggregate participant as a separate project], the Reserve may require further information to inform its COI determination.

A verification body may verify any number of reporting periods for a project for a maximum of six consecutive years. After the six-year period, the project developer must engage a different verification body to verify the project. The original verification body may continue to provide verification services for other projects developed by the same project developer, but it cannot provide verification services for the project in question for at least three years.

The cycling and rotation of verification bodies helps avoid COI situations that could arise from lengthy and ongoing business relationships. In addition, this process guarantees that another firm reviews previously verified reporting periods, thus providing another check on the consistency and appropriateness of protocol interpretation and professional judgment. The new verification body must re-check eligibility criteria per the protocol requirements, but it is not required to perform an additional verification of data that was verified in previous reporting periods"

Assessment outcome

Yes (1 Point).

Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled.

Indicator 5.3.6

Relevant scoring methodology provisions

"The program provisions as set out in the standards, procedures or guidance for validation and verification entities, or otherwise indicated in the normative program documents, require that audit reports from validation and verification entities include at least:

- · Details of audit dates
- Locations and scope of auditing

- · The team composition of the validation and verification body
- · Main findings
- · Corrective action requests."

Information sources considered

1 Climate Action Reserve Verification Program Manual, 3 February 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> <u>content/uploads/2021/02/Verification_Program_Manual_February_2021.pdf</u>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 5, page 45: "After a verification body has completed its review of a project developer's estimated GHG reductions or removals, it must take the following steps to document the verification process:
 - 1. Complete a detailed List of Findings containing both immaterial and material findings (if any) and deliver it to the project developer, allowing the opportunity for corrective actions (private document).
 - 2. Complete a detailed Verification Report and deliver it to the project developer (public document)."
- Provision 2 Source 1, section 5.1, page 45: "The List of Findings is a private document that details all material and immaterial findings identified by the verification team throughout the verification. These findings shall be distinguished by materiality and whether they were qualitative non-conformances or quantitative misstatements. The List of Findings shall be delivered first to the project developer in order to provide an opportunity to correct the issues that might impact CRT issuance. The List of Findings submitted to the Reserve should provide a summary of all findings and resolutions that arose during the verification process.

The List of Findings shall accompany the Verification Report and must include a record of all corrections or corrective actions made by the project developer to address the identified issues. A correction made by the project developer resolves an error and fixes the identified problem, while a corrective action fixes the cause of the problem in order to prevent its reoccurrence in future verifications. Each finding shall detail and list the identified issue and refer to the relevant section of the protocol but shall not provide any solutions or potential remedies for resolution. Resolutions constitute consulting advice and thus create a conflict of interest."

Provision 3 Source 1, section 5.2.1, page 47: "The Verification Report must clearly specify a detailed scope of the verification process and procedures undertaken. The scope includes the physical and temporal boundaries of the verification as well as the GHGs considered. The verification process must be fully documented, with particular focus on the risk-assessment and development of the verification plan. This documentation shall include a description of the verification activities based on the size and complexity of the project developer's operations. This section is expected to provide context for the remainder of the report.

In addition, the standard used to verify GHG emissions reductions or removals must be specified in the Verification Report. [...] The quantitative materiality threshold for verification must also be included. Verification bodies are required to adhere to all rules and guidelines relevant to the protocol version under which the project is being verified."

- Provision 4 Source 1, section 5.2.2, page 47-48: "For all project types, the Verification Report must include a description of the eligibility criteria, i.e., start date, location, the legal requirement test, the performance standard test, and regulatory compliance. The report must make an explicit and positive assertion as to whether each eligibility criterion has been met and explain the basis of this determination."
- Provision 5 Source 1, section 3.5.1, page 19: "Verification bodies must identify to the Reserve all staff members who are designated as verifiers and serve as key personnel in Exhibit A of the Verification Policies Acknowledgment and Agreement form, i.e., the Verification Staff Reporting form.7 This form must to be updated and electronically submitted to reserve@climateactionreserve.org whenever new staff members are designated as verifiers on a NOVA/COI form or once per year, whichever is more frequent.

A verification body may add or delete staff to its roster at any time. To add or delete designated staff, the verification body should resubmit the form with the names and contact information for any personnel changing from the roster and note if said personnel are to be removed, added, or their status updated. For each individual identified on the form, the firm shall describe his or her job classifications, relevant experience, education, academic degrees, professional licenses (for technical staff), and role for the Reserve's records. Failure to submit the Verification Staff Reporting form could result in suspension from the Reserve program."

Assessment outcome

Yes (1 Point).

Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled.

Indicator 5.3.7

Relevant scoring methodology provisions

"The program has procedures in place to perform oversight of the validation and verification entities that have been approved under the program. Oversight should include review of individual project validation or verification reports and systematic monitoring of the validation and verification entity's job performance."

Information sources considered

1 Verification Program Manual, 3 February 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> <u>content/uploads/2021/02/Verification_Program_Manual_February_2021.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 6.1, page 53-54: "Oversight is conducted by the Reserve to provide quality assurance and control on verification activities performed by accredited verification bodies. Oversight consists of a comprehensive examination and evaluation of project verification activities in order to assess verification body performance. It also serves as an opportunity for the Reserve to identify potential improvements to the program's processes and guidance. Oversight is not intended to hold a project or project developer to a different level of scrutiny or subject it to additional requirements. Oversight is an important element of the Reserve program and provides an extra level of assurance and transparency to bolster the validity of the credits issued.

[...]

A staff member, partner or consultant performing oversight for the Reserve will observe and evaluate:

- The overall performance of the verification body by reviewing its processes and procedures while conducting verification activities
- Whether the project activities meet the protocol requirements
- Whether the GHG reductions data reported to the Reserve can be verified to a reasonable level of assurance

The Reserve representative performing oversight or conducting an audit may discuss preliminary observations with the verification body and project developer before reporting the findings to the Reserve. Information requests should be addressed promptly. The oversight or audit process shall close with the issuance of a letter detailing the findings and overall evaluation to the verification body, usually upon conclusion of verification activities."

Assessment outcome

Yes (1 Point).

Justification of assessment

The above excerpts from the Verification Program Manual (Provision 1) meet the requirements of the indicator.

Indicator 5.3.8

Relevant scoring methodology provisions

"The program has procedures in place for reporting identified non-compliances to the validation and verification entity and its accreditation body(ies)."

Information sources considered

1 Verification Program Manual, 3 February 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> <u>content/uploads/2021/02/Verification Program Manual February 2021.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 6.1, page 53-54: "Oversight is conducted by the Reserve to provide quality assurance and control on verification activities performed by accredited verification bodies. Oversight consists of a comprehensive examination and evaluation of project verification activities in order to assess verification body performance. It also serves as an opportunity for the Reserve to identify potential improvements to the program's processes and guidance. Oversight is not intended to hold a project or project developer to a different level of scrutiny or subject it to additional requirements. Oversight is an important element of the Reserve program and provides an extra level of assurance and transparency to bolster the validity of the credits issued.

[...]

A staff member, partner or consultant performing oversight for the Reserve will observe and evaluate:

- The overall performance of the verification body by reviewing its processes and procedures while conducting verification activities
- Whether the project activities meet the protocol requirements
- Whether the GHG reductions data reported to the Reserve can be verified to a reasonable level of assurance

The Reserve representative performing oversight or conducting an audit may discuss preliminary observations with the verification body and project developer before reporting the findings to the Reserve. Information requests should be addressed promptly. The oversight or audit process shall close with the issuance of a letter detailing the findings and overall evaluation to the verification body, usually upon conclusion of verification activities."

Assessment outcome

No (0 Points).

Justification of assessment

The above excerpts from the Verification Program Manual (Provision 1) does not include any provisions requiring that non-compliances are reported to accreditation bodies. The indicator is therefore not fulfilled.

Indicator 5.3.9

Relevant scoring methodology provisions

"The accreditation bodies recognized by the carbon crediting program, or the carbon crediting program if it itself accredits validation and verification entities, have monitoring procedures in place to regularly assess the performance of validation and verification entities in providing auditing services to the relevant carbon crediting program (e.g. through regular accreditation surveillance, requirements for re-accreditation)."

Information sources considered

- 1 ANSI program website (<u>https://anab.ansi.org/greenhouse-gas-validation-verification/how-to-apply</u>), last accessed on 21 July 2021.
- 2 Accreditation Policy for ANAB Greenhouse Gas Validation / Verification Body Accreditation Program. PUBLIC POLICY GHG-PL-701. Revision 3. Document issued on 4 March 2021. Available: <u>https://anabpd.ansi.org/Accreditation/environmental/greenhouse-gas-validation-verification/DocumentDetail?DRId=119</u>.

Relevant carbon crediting program provisions

- Provision 1 Source 1: "Surveillance: Surveillance of accredited V/VBs provides confidence about the full implementation and effectiveness of the V/VBs system. The intent of regular surveillance is to assure stakeholders of the quality of the services provided. Surveillance occurs every year annually at the date of initial accreditation."
- Provision 2 Source 2, clause 10.1: "GHG Program operates based on a 5 year cycle. Therefore, reassessment activities shall be conducted during year 5 of the V/VB's accreditation in accordance with the GHG Program procedures. Reassessment shall proceed similar to initial assessment except that experience gained during previous assessments shall be taken into account."
- Provision 3 Source 2, clause 10.2: "Surveillance assessment on accredited V/VBs shall be conducted every year in accordance with the GHG Program procedures other than the years during which the V/VB undergoes reassessment per clause 10.1. The purpose of surveillance assessments is to monitor the continued conformance of accredited V/VBs with the international standards, appropriate guidance documents and ANAB policies and procedures."
- Provision 4 Source 2, clause 10.3: "Surveillance assessment shall be less comprehensive than initial assessments and reassessments but shall include document review, onsite assessment and at least one witness assessment. Specific number of witness assessments and sites to be visited shall be determined by ANAB staff in consultation

with technical assessor(s) if necessary. Surveillance onsite assessments shall be planned taking into account other surveillance activities."

Provision 5 Source 2, clause 10.4: "All V/VB premises from which one or more key activities are performed shall be assessed at least once within the accreditation cycle."

Assessment outcome

Yes (1 Point).

Justification of assessment

The Climate Action Reserve only accepts validation and verification entities accredited by the American National Standards Institute (ANSI) (see indicator 5.3.2). ANSI has appropriate procedures in place to periodically assess the performance of validation and verification bodies (Provision 1 to Provision 5). The indicator is therefore fulfilled.

Indicator 5.3.10

Relevant scoring methodology provisions

"The program has procedures in place for program personnel to perform their own quality control reviews of individual projects seeking registration and carbon credit issuance requests. Examples of quality control reviews of project compliance may include desk reviews of submitted project documentation, interviews with project owners, and/or in-person site visits."

Information sources considered

1 Climate Action Reserve Verification Program Manual, 3 February 2021. Available: <u>https://www.climateactionreserve.org/wp-</u> content/uploads/2021/02/Verification_Program_Manual_February_2021.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 61, page 53: "Audits are also conducted by the Reserve and may be initiated under similar circumstances. They are limited to a desktop review and are performed upon the completion of verification activities. While oversight covers the entirety of a verification body's processes and qualifications, an audit consists solely of an investigative review of the project data and documentation, as well as the verification body's analysis. The Reserve auditor must be granted the same degree of access that would be afforded to staff conducting an oversight, but participation in verification milestones will not occur."

Assessment outcome

Yes (1 Point).

Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled.

Indicator 5.3.11

Relevant scoring methodology provisions

"The program and/or the accreditation bodies recognized by the program have procedures in place to apply sanctions against validation and verification entities in cases of performance issues, including suspension or increased oversight (e.g. spot checks). Sanctions could be in response to accreditation lapses or other non-compliances identified by the program."

Information sources considered

- Climate Action Reserve Verification Program Manual, 3 February 2021. Available <u>https://www.climateactionreserve.org/wp-</u> content/uploads/2021/02/Verification_Program_Manual_February_2021.pdf.
- 2 Accreditation Policy for ANAB Greenhouse Gas Validation / Verification Body Accreditation Program. PUBLIC POLICY GHG-PL-701. Revision 3, 4 March 2021. Available: <u>https://anabpd.ansi.org/Accreditation/environmental/greenhouse-gas-validation-verification/DocumentDetail?DRId=119</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 6.4, page 55: "The Reserve maintains the right to rescind or suspend its recognition of an individual verifier or verification body for any period of time deemed appropriate. The Reserve will make every effort to accommodate the implementation of corrective actions prior to rescinding approval.

Suspensions could occur if the Reserve determines that a verification body or individual verifier intentionally violated the COI policies, committed willful misconduct, displayed negligence, proved unable to uphold obligations to the Reserve, or was responsible for any other significant non-conformance with Reserve rules, protocols, or procedures.

The Reserve will make public any suspensions of verification bodies on its website. However, suspensions of individual verifiers, including Lead Verifiers, will not be publicly noticed.

Verification bodies could also be subject to suspension of their ISO 14065 accreditation issued by the accrediting body and must adhere to the rules and procedures surrounding that process."

- Provision 2 Source 2, clause 11.1: "The V/VB may apply to request extension of the scope of ANAB accreditation. ANAB shall conduct due assessment based on the requirements of the new scope(s) which may include an onsite assessment."
- Provision 3 Source 2, clause 11.2: "Decision on extension of scope of accreditation shall be made by the GVAC in accordance with GHG Program procedures once the V/VB has

satisfactorily closed all the NCRs related to the new scopes and paid all the fees related to scope extension."

- Provision 4 Source 2, clause 11.3: "Based on GHG Program procedures, accreditation of the V/VB may be reduced, suspended, or withdrawn by the GVAC for a persistent failure of the accredited V/VB to abide by relevant standards and ANAB policies and procedures."
- Provision 5 Source 2, clause 11.4: "The V/VB may request ANAB to reduce or suspend its scope of accreditation or voluntarily withdraw from accreditation."

Assessment outcome

Yes (1 Point).

Justification of assessment

Section 6.4 of the Verification Program Manual specifies the Reserve's provisions for the rescission or suspension of verifier or verification body approval in the case of non-conformance with the Reserve rules, protocols, or procedures. In case the Reserve finds that a verification body has failed to meet the Reserve's standards, it may require the verification body to undertake specified corrective actions (Provision 1). The American National Standards Institute (ANSI) accreditation body also has appropriate procedures in place to apply sanctions against validation and verification entities in cases of performance issues (Provision 2 to Provision 5). The indicator is therefore fulfilled

Scoring results

According to the above assessment, the carbon crediting program receives 11 out of 13 achievable points. Applying the scoring approach of the methodology, this results in a score of 4.23.